

IV. Environmental Impact Analysis

J. Transportation

1. Introduction

This section of the Draft EIR analyzes the Project's potential transportation/traffic impacts. This section is based on the *CEQA Analysis of Transportation Impacts chapter of the Transportation Assessment for the Angels Landing Project* (Transportation Assessment) prepared by Gibson Transportation Consulting, Inc., dated May 2020 and included in Appendix J.1 of this Draft EIR. The Transportation Assessment follows the Los Angeles Department of Transportation's (LADOT) July 2019¹ *Transportation Analysis Guidelines* (TAG), which are described in more detail below, and was prepared in accordance with the analysis methodology and base assumptions set forth in the *LADOT Memorandum of Understanding* (MOU) approved on January 8, 2020, included as Appendix A of the Transportation Assessment. The Transportation Assessment was approved by LADOT on August 5, 2020.

2. Environmental Setting

a. Regulatory Framework²

(1) California Senate Bill 743

On September 27, 2013, Governor Edmund G. "Jerry" Brown signed Senate Bill (SB) 743, which went into effect in January 2014 and directed the Governor's Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (LOS). This started a process that has changed the requirements for transportation impact analyses under CEQA. These changes include elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as a basis for determining

¹ *The July 2019 version of the TAG is the version that applies to this Project as it was the version in effect when the Notice of Preparation (NOP) was circulated, was the version evaluated in the Transportation Assessment, and is the version cited in LADOT's August 5, 2020, letter approving the Transportation Assessment. As such, the July 2019 version of the TAG is applied in this analysis.*

² *This section of the Draft EIR does not address the Los Angeles County Congestion Management Program (CMP) as all jurisdictions in Los Angeles County are now exempt from the CMP as of July 2019.*

significant transportation impacts resulting from land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are no longer considered significant impacts on the environment. As set forth in SB 743, these changes were necessary to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.”

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which had been released on August 6, 2014. Of particular relevance was the updated text of State CEQA Guidelines Section 15064.3, which as discussed further below establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts.

Lastly, SB 743 adds Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”³

(2) State CEQA Guidelines Section 15064.3

As discussed above, State CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor may be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions also may be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express any resulting change in absolute terms, on a per capita or per household basis, or by any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed the City of Los Angeles VMT Calculator Version 1.2 (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City

³ PRC Section 21099(d)(1).

limits.⁴ The methodology in determining VMT based on the VMT Calculator is consistent with State CEQA Guidelines Section 15064.3 and the City's TAG.

(3) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region and balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations (MPOs) throughout the State to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing, and environmental planning.⁵ Within the 2016–2040 RTP/SCS, the overarching strategy includes High-Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.⁶ Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.⁷ The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS.⁸ Refer to Section IV.F, Land Use, of this Draft EIR, for a detailed discussion and consistency analysis of the relevant provisions of the 2016–2040 RTP/SCS that apply to the Project.

On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.⁹ As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible

⁴ Los Angeles Department of Transportation, *City of Los Angeles VMT Calculator Version 1.2*, November 2019.

⁵ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 166, adopted April 7, 2016.

⁶ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.

⁷ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 76.

⁸ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 77, Exhibit 5.1: *High Quality Transit Areas in the SCAG Region for 2040 Plan*.

⁹ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal*, September 3, 2020.

ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.¹⁰ On October 30, 2020, CARB accepted SCAG's determination that the SCS met the applicable state greenhouse gas emissions targets. The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS as discussed later in this section, the Project would also be consistent with the 2020–2045 RTP/SCS.¹¹ Because the 2020–2045 RTP/SCS was adopted by SCAG subsequent to both circulation of the Notice of Preparation (NOP) for the Project on March 29, 2019 and approval by LADOT of the Transportation Assessment for the Project on August 8, 2020, this section and the balance of this Draft EIR provided detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

(4) General Plan Framework Element and Mobility Plan 2035

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

- In August 2015, the City Council initially adopted the Mobility Plan 2035 (Mobility Plan), which is an update to the Transportation Element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.¹² The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City's residents interact with their streets.

The *Mobility Plan 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. The Plan serves to meet the goals in SCAG's RTP to decrease the

¹⁰ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020*.

¹¹ *For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within a High-Quality Transit Area (HQT) immediately adjacent to a Metro light rail station and in close proximity to more than a dozen bus routes, would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.*

¹² *Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, adopted September 7, 2016.*

VMT per capita by 5 percent every five years, to 20 percent by 2035, and to meet a 9-percent per capita greenhouse gas reduction by 2020 and a 16-percent per capita reduction by 2035.

Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan. Refer to Section IV.F, Land Use, of this Draft EIR for a discussion of the Project's consistency with the Transportation Chapter of the Framework Element and Mobility Plan 2035.

Street classifications/standards are designated in the General Plan Transportation Element. The Mobility Plan has modified those street standards to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access.

The Mobility Plan also identifies the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network. The Transit Enhanced Network is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within 1 mile of the network by 2035. The Mobility Plan proposes to design and implement by 2035 Pedestrian Enhanced Districts (PEDs) within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and areas with the highest concentration of pedestrian fatalities and severe injuries. PEDs include pedestrian improvements on arterial streets that are intended to provide better walking connections to and from the major destinations within communities. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

(5) Central City Community Plan

The General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles. The Project Site is located within the Bunker Hill area of the Central City Community Plan (Adopted Community Plan).¹³ The Adopted Community Plan includes transportation-related objectives, policies, and programs that address issues such as aging infrastructure, traffic congestion, inadequate transportation connections, parking, and enhancing the

¹³ *Los Angeles Department of City Planning, Central City Community Plan, adopted January 8, 2003.*

pedestrian environment. Refer to Section IV.F, Land Use, of this Draft EIR, for a detailed discussion and consistency analysis of the relevant provisions of the Adopted Community Plan that apply to the Project.

The City of Los Angeles Department of City Planning (DCP) is currently updating the Central City Community Plan in conjunction with an update to the Central City North Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined plan called the Draft Downtown Community Plan, discussed further below.

(6) Draft Downtown Los Angeles Community Plan

The draft Downtown Los Angeles Community Plan is currently undergoing refinement and has not yet been adopted. Thus, the information provided herein is for informational purposes.

The purpose of the Draft Downtown Community Plan is to create and implement a vision of the future for Downtown Los Angeles.¹⁴ According to regional projections, by the year 2040, Downtown Los Angeles will experience growth of approximately 125,000 people, 70,000 housing units, and 55,000 jobs. Among the core principles of the Draft Downtown Community Plan are to promote a transit-, bicycle-, and pedestrian-friendly environment; to create linkages between districts, and to create a world-class public realm and streets.

(7) Bunker Hill Specific Plan

The Bunker Hill Specific Plan's (Specific Plan) overarching purposes that are relevant to transportation issues include encouraging infill development that enlivens streets and public spaces; expanding, integrating, and activating a linked network of public open spaces and pedestrian pathways; expanding the regional transit network through an urban form and mix of land uses that support high levels of transit use; creating a transit-friendly environment through the application of pedestrian-oriented design guidelines; and implementing special street standards developed for the area.

Refer to Section IV.F, Land Use, of this Draft EIR, for a detailed discussion and consistency analysis of the relevant provisions of the Specific Plan that apply to the Project.

¹⁴ Los Angeles Department of City Planning, *draft Downtown Los Angeles Community Plan*, June 2019.

(8) Plan for a Healthy Los Angeles

The *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan* (Plan for a Healthy Los Angeles) introduces 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.¹⁵ Examples include, but are not limited to: (1) providing mixed-use transit-oriented development that reduces traffic and associated vehicle miles travelled (VMT) and air emissions; (2) improving pedestrian passages and connectivity to transit encourage healthy living by promoting bicycling and walking; (3) providing affordable housing that increases the equitable access to housing; and (4) providing cultural/civic space in new development to, among other things, provide a forum for community awareness.

(9) Los Angeles Municipal Code

The LAMC includes numerous provisions regarding transportation that apply to the Project, including: Section 12.21 A.16 regarding bicycle parking requirements for new development; Section 12.26 J regarding trip reduction requirements (e.g., transportation demand measures) for projects with new non-residential floor area; and Section 12.37 regarding Highway and Collector Street dedications and improvements to the public right-of-way. In addition, with regard to construction traffic, LAMC Section 41.40 limits construction activities to the hours between 7:00 A.M. and 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and national holidays. No construction is permitted on Sundays.

(10) Vision Zero

As described in *Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025*, Vision Zero is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death.¹⁶ Vision Zero has identified the High Injury Network, a network of streets based on collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. The Project Site is not adjacent to any streets identified in the City's High Injury Network, and no Vision Zero Safety Improvements are planned in the vicinity. As indicated in Figure IV.J-1 on page IV.J-8, the closest streets to the Project Site on the High Injury Network are Broadway and 5th Street, located one block to the east and south, respectively.

¹⁵ Los Angeles Department of City Planning, *The Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*, March 2015.

¹⁶ City of Los Angeles, *Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025*, August 2015.

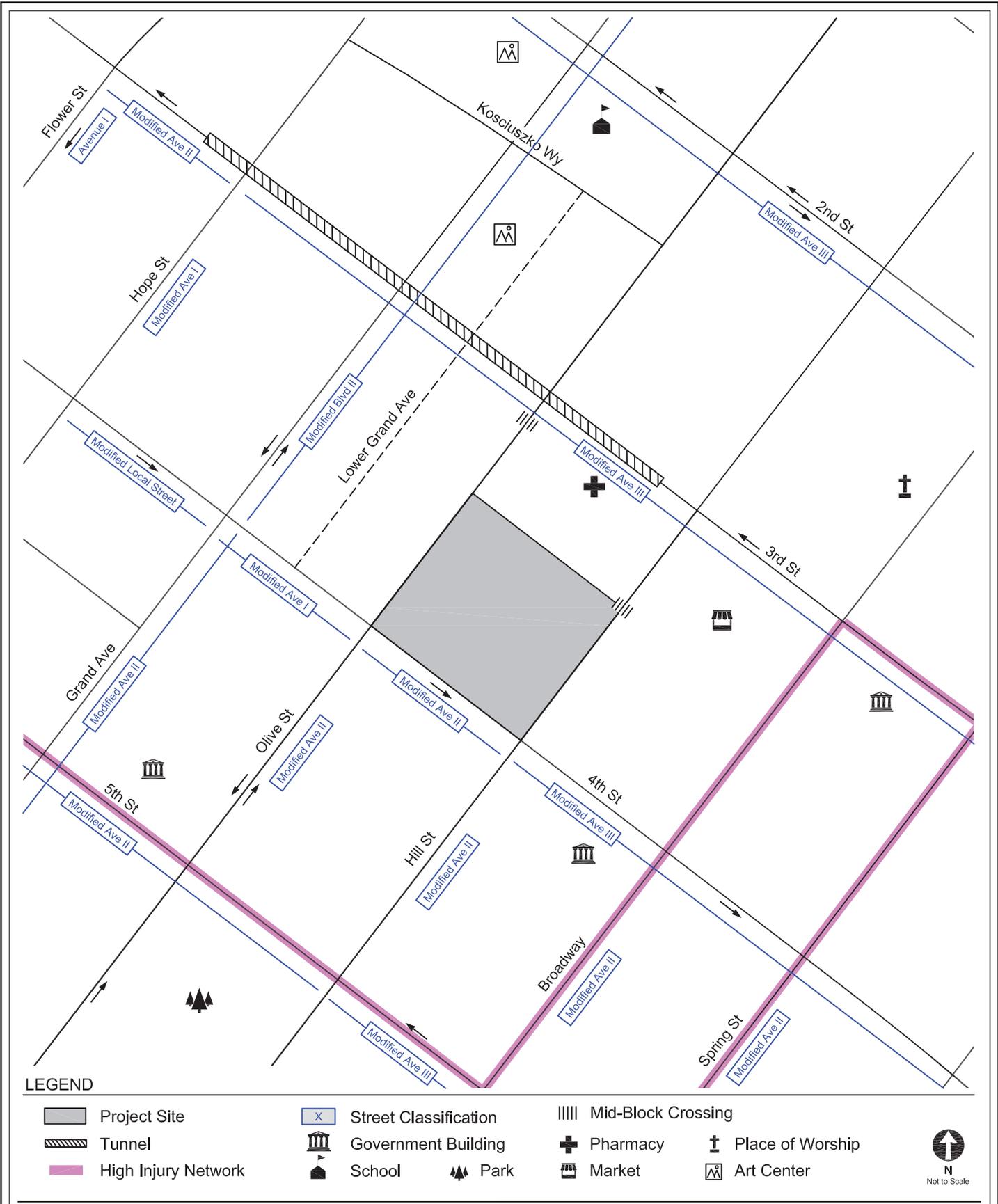


Fig. IV.J-1
Study Area and Existing Transportation Facilities

(11) Citywide Design Guidelines¹⁷

The *Citywide 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.¹⁸ The design guidelines most relevant to transportation issues include the following:

- Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

Refer to Section IV.F, Land Use, of this Draft EIR, for a broader discussion of applicable guidelines.

(12) Walkability Checklist

Walkability Checklist—Guidance for Entitlement Review (LADCP, November 2008) (Walkability Checklist) serves as a guide for enhancing pedestrian movement, access, comfort, and safety to contribute to the overall walkability of the City. Transportation-applicable topics include:

- Sidewalks
- Crosswalks/Street Crossings
- On-Street Parking
- Building Orientation
- Off-Street Parking and Driveways

¹⁷ *Project consistency with applicable transportation guidelines of the Citywide Design Guidelines, rather than with the applicable transportation guidelines of the Downtown Design Guide, is evaluated in this section because the Citywide Design Guidelines are listed in Table 2.1.1 of the July 2019 TAG and the Downtown Design Guide is not. For an analysis of Project consistency with broad applicable guidelines of the Downtown Design Guide, see Section IV.F, Land Use, of this Draft EIR.*

¹⁸ *City of Los Angeles Department of City Planning, Urban Design Studio, Citywide Design Guidelines, October 2019.*

(13) Mobility Hub Reader's Guide

Mobility Hubs: A Reader's Guide (LADCP, 2016) provides guidance for enhancing transportation connections and multi-modal improvements in proximity to new or existing transit stations. It specifically focuses on enhancing bicycle connections, providing vehicle sharing services, improving bus infrastructure, providing real-time transit and wayfinding information, and enhancing walkability and pedestrian connections.

(14) LADOT Manual of Policies and Procedures (Design Standards)

LADOT's *Manual of Policies and Procedures* provides plans and requirements for traffic infrastructure features in the City, such as roadway striping and other markings, signage, on-street parking, crosswalks, and turn lanes. In particular, Section 321 provides the basic criteria for review of driveway designs. As discussed therein, the basic principle of driveway location planning is to minimize possible conflicts between users of a parking facility and users of the abutting street system, as well as considering the safety of pedestrians.

(15) LADOT Interim Guidance for Freeway Safety Analysis

LADOT's *Interim Guidance for Freeway Safety Analysis* (City Freeway Guidance) identifies City requirements for a CEQA safety analysis of California Department of Transportation (Caltrans) facilities as part of a transportation assessment. The City Freeway Guidance relates to the identification of potential safety impacts related to vehicle queuing at freeway off-ramps due to increased traffic from development projects. It provides interim guidance regarding a methodology and significance criteria for assessing whether additional vehicle queuing 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.

b. Existing Conditions

The Project Site is located at 332, 350, and 358 South Olive Street; 351 and 361 South Hill Street; and 417 and 425 West 4th Street within the Central City Community Plan area of the City. The Project Site comprises approximately 2.24 acres that are mostly landscaped and vacant, with the exception of Metro's Pershing Square Station portal located at the southeast corner of the Project Site and the publicly accessible stairway adjacent to the historic Angels Flight funicular railway on the northern boundary of the Project Site.¹⁹ As shown in Figures II-1 and II-2 in Section II, Project Description, of this

¹⁹ *Angels Flight is an historic funicular railway originally constructed in 1901 with tracks connecting Hill Street and Olive Street. The tracks are along the northern edge of the Project Site and connect Hill Street and California Plaza.*

Draft EIR, the Project Site is generally bounded by Angels Flight to the north, Hill Street to the east, 4th Street to the south, and Olive Street and the California Plaza to the west.

Primary regional access to the Project Site is provided by the Harbor Freeway (I-110/SR 110), located 0.45 mile to the west, and the Santa Ana Freeway (US-101), located 0.56 mile to the north. Local access is provided by arterial streets such as Olive Street, Hill Street, and 4th Street. As the Project Site sits atop the Metro portal, direct access is available from the Project Site to the City's Metro light rail system. The Project Site is also served by numerous transit lines primarily along Olive Street, Hill Street, Broadway, and 5th Street. In addition, the Project Site is located adjacent to the Angels Flight funicular railway which provides a pedestrian connection between Hill Street and Olive Street as well as California Plaza, a heavily utilized pedestrian area offering views, food, and outdoor venues.

The following discussion describes key streets, transit routes, and pedestrian and bicycle facilities serving the Project Site within the Study Area (i.e., the geographic area analyzed in the Transportation Assessment included as Appendix J.1 of this Draft EIR).

(1) Study Area

Depicted in Figure IV.J-1 on page IV.J-8, the Study Area was established in consultation with LADOT as part of the MOU process and is based on the following factors identified in the TAG:

- Primary driveway(s);
- Intersections at either end of the block on which the Project is located or up to 600 feet from the primary Project driveway(s);
- Unsignalized intersections adjacent to the Project Site that are integral to the Project's site access and circulation plan; and
- Signalized intersections in proximity to the Project Site where 100 or more Project trips would be added.

(2) Existing Street System

The existing street system, identified in Figure IV.J-1 and described below, consists of freeways that provide regional access and roadways, including arterials and local streets, that provide sub-regional and local access to the Project Site. The street classifications described below are from Mobility Plan 2035.

(a) Freeways

- SR 110—SR 110 generally runs in a north-south direction in the area of the Project Site. In the Project Site area, SR 110 provides three travel lanes in each direction. Access to and from SR 110 is available via interchanges at 3rd Street, 4th Street, and 5th Street within the Study Area.
- US-101—US-101 generally runs in an east-west direction in the area of the Project Site. In the Project Site area, US-101 provides four travel lanes in each direction with various auxiliary lanes. Access to and from US-101 is available via interchanges at N. Figueroa Street/S. Hope Street, N. Broadway, N. Spring Street, and Los Angeles Street.

(b) Roadways

- Olive Street—Olive Street is a designated Modified Avenue II that runs in the north-south direction and is located adjacent to the western boundary of the Project Site. South of 5th Street, it generally provides three to four northbound travel lanes (one-way operation). North of 5th Street, it provides one to two southbound lanes and two to three northbound lanes within the Study Area. North of 5th Street, daytime 2-hour metered parking is available on the east side of the street with afternoon peak-hour restrictions within the Study Area. Between 5th Street and 6th Street, daytime metered parking is generally available on the west side of the street. South of 6th Street, daytime 2-hour metered parking with afternoon peak-hour restrictions is generally available on the west side of the street within the Study Area.
- Hill Street—Hill Street is a designated Modified Avenue II that runs in the north-south direction and is located adjacent to the eastern boundary of the Project Site. It generally provides four travel lanes, two lanes in each direction, with left-turn lanes at major intersections. Daytime 2- and 4-hour metered parking is generally available with morning peak-hour restrictions on the west side of the street and afternoon peak-hour restrictions on the east side of the street south of 2nd Street within the Study Area. Parking is generally not allowed north of 2nd Street within the Study Area.
- Broadway—Broadway is a designated Modified Avenue II that runs in the north-south direction and is located east of the Project Site. It generally provides three travel lanes, two northbound and one southbound, with left-turn lanes at intersections. Daytime 2-hour metered parking is generally available on the east side of the street north of 3rd Street within the Study Area. Daytime 2-hour metered parking is generally available on both sides of the street south of 3rd Street within the Study Area. Bicycle sharrows are provided on Broadway south of 3rd Street.
- 2nd Street—2nd Street is a designated Modified Avenue III that runs in the east-west direction and is located north of the Project Site. It generally provides two

travel lanes, one lane in each direction, within the Study Area. Daytime 2-hour metered parking with is generally available on the south side of the street east of Hill Street within the Study Area.

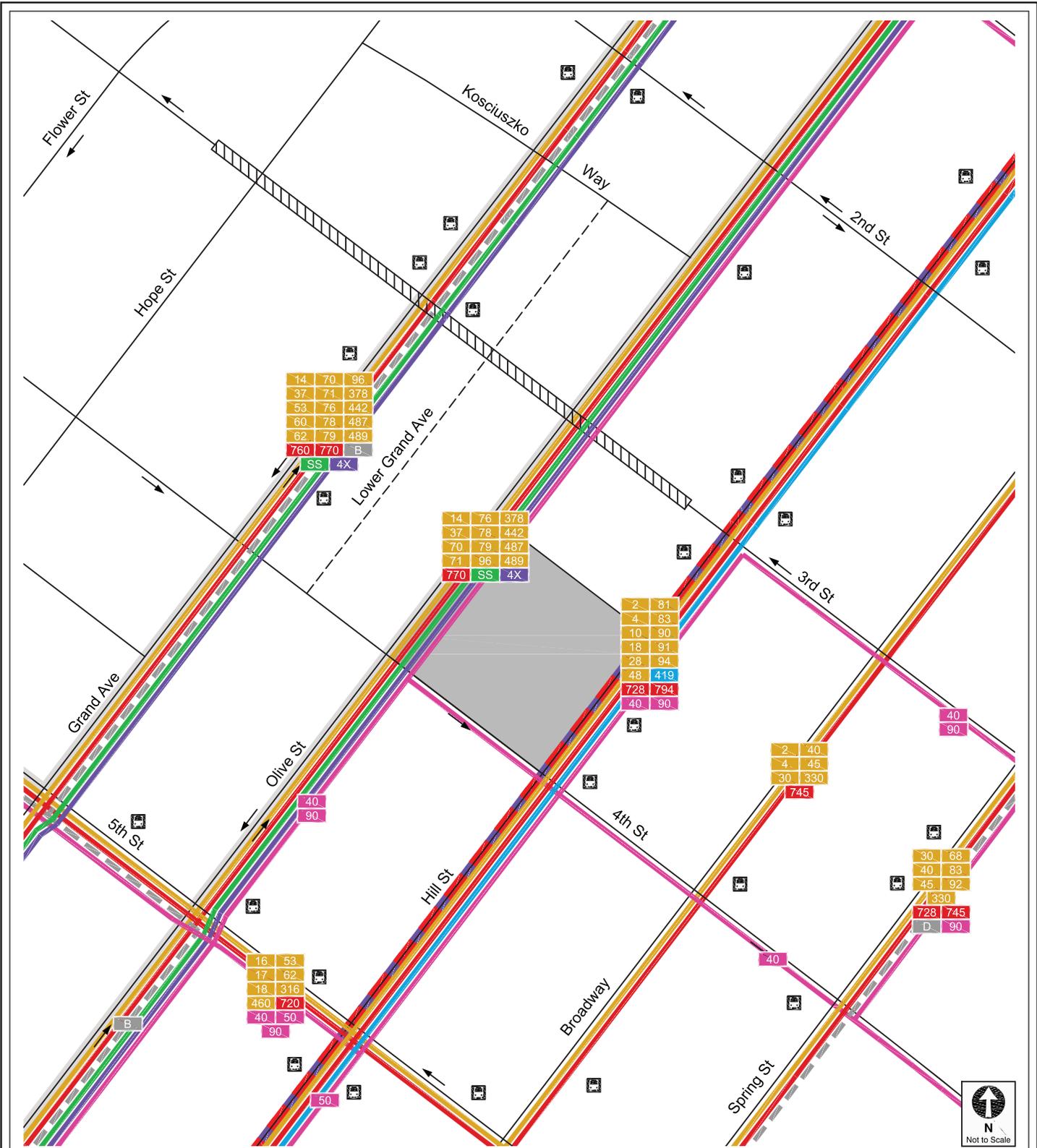
- 3rd Street—3rd Street is a designated Modified Avenue III that generally travels one-way in the westbound direction and is located north of the Project Site. It generally provides two westbound travel lanes within the Study Area. Daytime 2-hour metered parking with morning and afternoon peak-hour restrictions is generally available on both sides of the street east of Hill Street within the Study Area. Daytime 2-hour metered parking is generally available on both sides of the street between Hope Street and Grand Avenue within the Study Area.
- 4th Street—4th Street is a designated Modified Avenue I between Grand Avenue and Olive Street, a Modified Avenue II between Olive Street and Hill Street, and a Modified Avenue III east of Hill Street. It generally travels one-way in the eastbound direction and is located along the southern boundary of the Project Site. It generally provides two to four eastbound travel lanes within the Study Area. Daytime 2-hour metered parking is generally available on both sides of the street east of Hill Street within the Study Area. Daytime 2-hour metered parking is generally available on the north side of the street between Grand Avenue and Hill Street. Parking is generally not available west of Grand Avenue.
- 5th Street—5th Street is a designated Modified Avenue II west of Hill Street and a Modified Avenue III east of Hill Street. It generally travels one-way in the westbound direction and is located south of the Project Site. It generally provides four westbound travel lanes within the Study Area. Daytime 2-hour metered is generally available on the north side of the street west of Main Street, and on both sides of the street west of Broadway. Within the Study Area, parking is not available on either side of the street west of Hill Street.

(3) Existing Transit System

As indicated in Figure IV.J-2 on page IV.J-14, the Project Site and greater Study Area are served by the Metro light rail system and bus lines operated by Metro, LADOT Downtown Area Shuttle (DASH), LADOT Commuter Express (CE), Foothill Transit, Santa Monica Big Blue Bus, Torrance Transit, and Montebello Bus lines. The following provides a brief description of the transit lines within the Study Area and their total ridership capacity.

(a) Metro Light Rail Lines

The Metro B and D Lines are accessible from the on-site Metro portal. The Metro B Line runs between North Hollywood and Downtown, while the Metro D Line runs between Koreatown and Downtown.



LEGEND

- Project Site
- Bus Stop
- Metro Rail (B & D Line)
- Metro Local/Limited
- Metro Rapid
- Metro Transitway (Silver Line)
- LADOT DASH
- LADOT Commuter Express
- Foothill Transit
- Montebello Bus Lines
- Torrance Transit

Fig. IV.J-2
Existing Transit Service

(b) Bus Lines

As indicated in Table 2 of the Transportation Assessment, included as Appendix J.1 of this Draft EIR, the Project Site and greater Study Area are served by a total of 48 Metro, DASH, CE, Foothill Transit, Santa Monica Big Blue Bus, Torrance Transit, and Montebello Bus lines. The majority of these lines extend from one point to another within Downtown Los Angeles or between Downtown and both adjacent areas of the City and adjacent cities, with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Of these lines, 29 run along the segments of Olive Street, Hill Street and 4th Street bordering the Project Site, as illustrated in Figure IV.J-2 on page IV.J-14. As further indicated in Figure IV.J-2, there are a total of 10 bus stops within a 1.5-block radius of the Project Site, including two on Hill Street across from the Project Site. For a complete list of the bus lines serving the Project Site and Study Area, including the start and end point of each line, service type, hours of operation, and average headway (in minutes), see Table 2 in the Transportation Assessment included as Appendix J.1 of this Draft EIR.

(c) Ridership Capacity

Tables 3A and 3B in the Transportation Assessment included as Appendix J.1 of this Draft EIR, summarize the total capacity of the Metro transit system and LADOT bus lines during the morning and afternoon peak hours based on the frequency of service of each line and the maximum seated and standing capacity of each bus or train. As indicated therein, the Metro and LADOT bus lines within 0.25 mile walking distance of the Project Site currently provide additional capacity for 15,607 transit riders during the morning peak hour and 13,844 transit riders during the afternoon peak hour. Additionally, the Metro B and D Lines provide additional capacity for approximately 5,454 transit riders during the morning peak hour and 4,821 transit riders during the afternoon peak hour. In total, the public transit system in the Study Area has available capacity for approximately 21,061 additional riders during the morning peak hour and 18,665 additional riders during the afternoon peak hour. Ridership data information was not available for Foothill Transit, Torrance Transit, and Montebello Bus Lines services, so any additional capacity from those services could not be calculated into the above values but are expected to provide additional capacity. For conservative purposes, bus lines with stop locations located more than a walking distance of 0.25 mile from the Project Site were not included.

(4) Existing Site Access and Parking

There is one existing driveway into the Project Site—a gated driveway off of Olive Street beneath the California Plaza overbuild (e.g., the portion of California Plaza that extends over Olive Street). There is no existing parking on the Project Site. Existing street parking is available along all of the portion of 4th Street abutting the Project Site and along portions of the Olive Street and Hill Street segments abutting the Project Site.

(5) Existing Pedestrian and Bicycle Facilities

(i) Pedestrian Facilities

The walkability of an area is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile.

The sidewalks that serve as routes to the Project Site provide proper connectivity, adequate widths, and accessible intersection crossings for a comfortable and safe pedestrian environment. The following signalized intersections provide pedestrian access in the vicinity of the Project Site and have marked pedestrian crossings on all approaches:

- Olive Street & 4th Street
- Hill Street & 4th Street

As indicated in Figure IV.J-1 on page IV.J-8, signalized midblock crosswalks are also available along Olive Street and Hill Street (including at the Project Site's northeast corner on Hill Street at the bottom of Angels Flight). The signalized intersections and signalized midblock crosswalks provide pedestrian access to the Project Site, as well as pedestrian phasing, crosswalk striping, and Americans with Disabilities Act (ADA) curb ramps. Additional pedestrian facilities within the Study Area are detailed in Figures 4 and 5 of the Transportation Assessment included as Appendix J.1 of this Draft EIR.

(ii) Bicycle Facilities

Based on 2010 Bicycle Plan: A Component of the City of Los Angeles Transportation Element (2010 Bicycle Plan), the existing bicycle system consists of a limited network of bicycle lanes (Class II) and bicycle routes (Class III). Class II bicycle lanes are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. Class III bicycle routes and bicycle-friendly streets are those where motorists and cyclists share the roadway and there is no separated striping for bicycle travel. Bicycle routes and bicycle-friendly streets are preferably placed on collector and low volume arterial streets. Bicycle routes with shared lane markings or "sharrows" remind bicyclists to ride farther from parked cars to prevent collisions, increase awareness of motorists that bicycles may be in the travel lane, and show bicyclists the correct direction of travel.

There are no bicycle lanes designated in the 2010 Bicycle Plan along the portions 4th Street, Olive Street, and Hill Street fronting the Project Site. The closest 2010 Bicycle Plan-designated bicycle lanes are:²⁰

- Hill Street—Along Hill Street south of 4th Street, across the 4th Street/Hill Street intersection from the Project Site;
- Spring Street—Along Spring Street, two blocks east of the Project Site; and
- 2nd Street—Along 2nd Street, 1.5 blocks north of the Project Site.

(6) High Injury Network

As previously discussed, Vision Zero is a traffic safety policy that promotes strategies to eliminate transportation-related collisions that result in severe injury or death. Vision Zero has identified a High Injury Network, a network of streets included based on collision data from the last five years, where strategic investments would have the biggest impact in reducing death and severe injury. The Project Site is not located adjacent to any streets identified in the High Injury Network. As indicated in Figure IV.J-1 on page IV.J-8, the closest streets to the Project Site on the High Injury Network are 5th Street from Broadway westward and Broadway between 3rd and 5th Streets.

c. Future Without Project Conditions

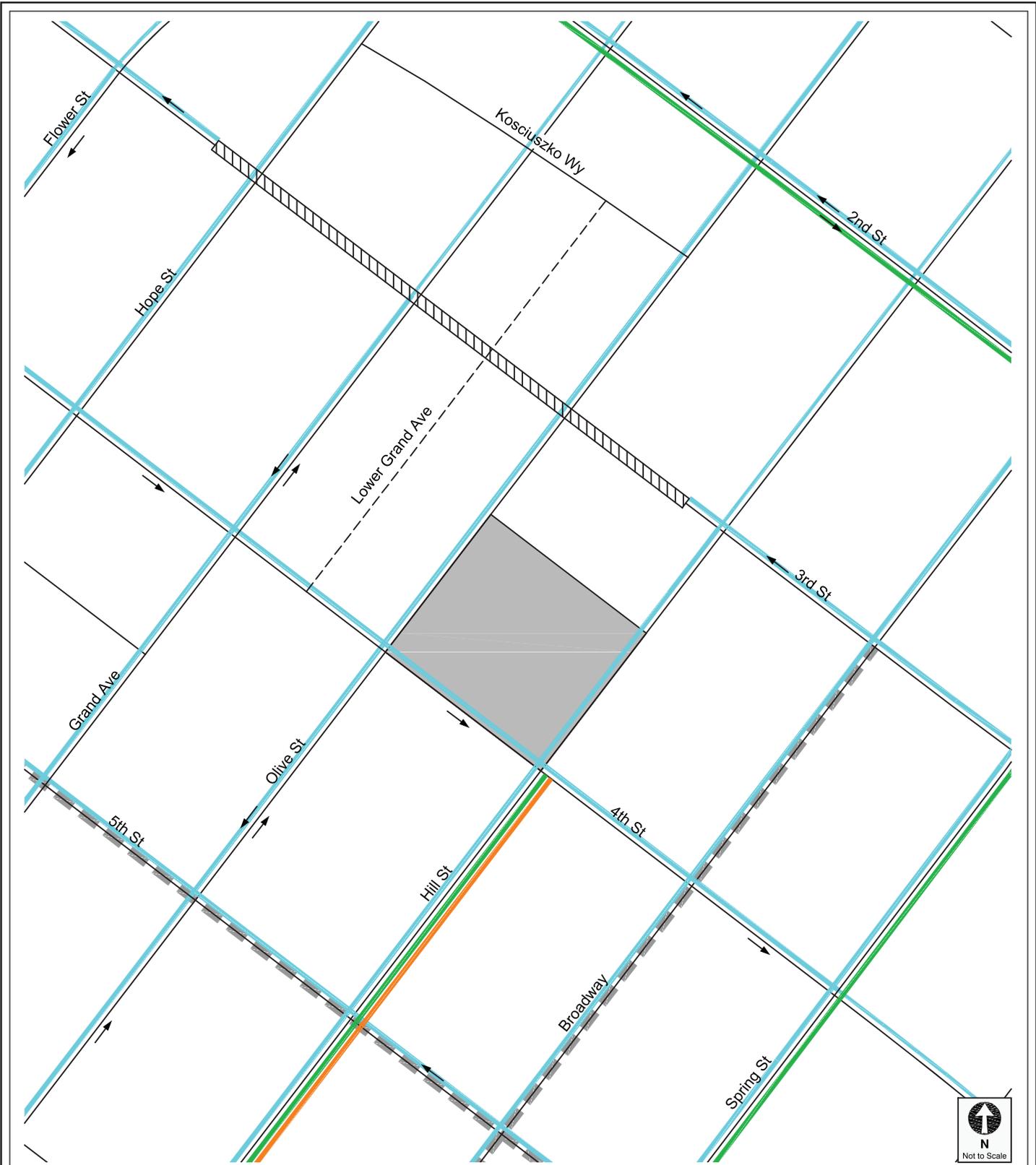
Project construction is anticipated to be completed in 2026, with full occupancy anticipated in 2028. The Transportation Assessment incorporates a list of 50 related projects that was generated based on information provided by DCP and LADOT, as well as recent studies of projects in the area. The related projects are identified in Table III-1 and Figure III-1 in Section III, Environmental Setting, of this EIR, and are also identified in Table 4 of the Transportation Assessment along with their associated vehicular trip generation.

The transportation network within the Study Area could be affected by regional improvement plans, local specific plans, and programmed improvements implemented prior to full occupancy of the Project. Therefore, the analysis of Future (2028) Conditions accounts for roadway improvements that have been funded and are expected to be implemented prior to full occupancy of the proposed Project. Other proposed roadway improvement projects that are not funded and traffic/trip reduction strategies such as Transportation Demand Management (TDM) programs for individual buildings and

²⁰ City of Los Angeles, 2010 Bicycle Plan—Designated Bikeways Map, adopted March 1, 2011.

developments were omitted from the Future (2028) Conditions analysis. The anticipated improvements are identified in Figure IV.J-3 on page IV.J-19 and are described below:

- Metro Regional Connector: The Metro Regional Connector project is a 1.9-mile underground light rail system that will extend from the Metro Gold Line Little Tokyo/Arts District Station to the 7th Street/Metro Center Station, allowing passengers to make direct transfers between the A (formerly known as Blue), E (formerly known as Expo), B, and D Lines. The Metro Regional Connector will improve access to both local and regional destinations by providing continuous service between these lines and providing connectors to other rail lines via the 7th Street/Metro Center Station. Three new transit stations are being developed with as part of the Metro Regional Connector, including one at the Grand Avenue Arts/Bunker Hill Station at 2nd Place and Hope Street. The Metro Regional Connector is anticipated to be completed and in operation by 2022. The Metro Regional Connector will be underground and will not affect the at-grade street configurations of the corridors in the Study Area. No changes to the street network were made based on this project.
- Los Angeles Streetcar: The Los Angeles Streetcar project will revive the historic streetcar service that once spanned 600 miles of the City in the early 20th Century. The proposed approximately 4-mile route of the project will closely follow the alignments that originally ran through Downtown. The Los Angeles Streetcar will enhance mobility and transit circulation and support the growth and revitalization of Downtown. The Los Angeles Streetcar is anticipated to begin operation in 2021. However, as the design of the Los Angeles Streetcar has not been finalized, it remains speculative and was not included in the future year analyses.
- Mobility Plan: In the Mobility Plan, the City identifies key corridors as components of various “mobility-enhanced networks.” Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements that may be implemented in those networks have not yet been identified, and there is no schedule for implementation; therefore, no changes to vehicular lane configurations were made to Future (2028) Conditions as a result of the Mobility Plan. However, the following mobility-enhanced networks include corridors within or near the Study Area and are depicted in Figure IV.J-3 on page IV.J-19.
 - Transit Enhanced Network (TEN): The TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. The TEN has designated Broadway and 5th Street within the Study Area as part of the network.



LEGEND

- Project Site
- Transit Enhanced Network
- Pedestrian Enhanced Network
- Bicycle Network
- Neighborhood Enhanced Network

Fig. IV.J-3
Future Transportation Facilities

Source: Gibson Transportation Consulting, Inc., May 2020.

- **Neighborhood Enhanced Network (NEN)**: The NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. The NEN has designated Hill Street south of 4th Street within the Study Area as part of the network.
- **Bicycle Enhanced Network (BEN)**: The BEN includes the Bicycle Path Network and the Bicycle Network. No streets within the Study Area are designated as part of the Bicycle Path Network, but Hill Street south of 4th Street and 2nd Street within the Study Area are part of the Bicycle Network.
- **Pedestrian Enhanced District (PED)**: The Mobility Plan aims to promote walking to reduce the reliance on automobile travel by providing more attractive and pedestrian-friendly sidewalks, as well as adding pedestrian signalizations, street trees, and pedestrian-oriented design features. The PED has designated all streets within the Study Area as Pedestrian Segments, where pedestrian improvements could be prioritized to provide better connectivity to and from major destinations within communities.

3. Project Impacts

a. Thresholds of Significance

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

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

Threshold (b): Conflict 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); or

Threshold (d): Result in inadequate emergency access.

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018 and were

subsequently adopted by the City of Los Angeles (City) on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines Update*, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The *CEQA Transportation Analysis Guidelines Update* establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted a new TAG. The analysis in this section and the Transportation Assessment, included as Appendix J.1 of this Draft EIR, uses the 2019 TAG which is the version of the TAG that applies to this Draft EIR and is therefore used in the Transportation Assessment and the impact analysis herein.

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

As previously discussed, the above Threshold (a) from State CEQA Guidelines Appendix G has been updated to require an analysis of a project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Table 2.1.1 of the July 2019 TAG identifies the City plans, policies, programs, ordinances, and standards relevant in determining project consistency. Table 2.1.2 of the July 2019 TAG provides a list of questions to help guide whether a project conflicts with the City's plans, programs, ordinances, and policies. Therefore, the impact analysis below, summarized from the Transportation Assessment, provided in Appendix J.1 of this Draft EIR, evaluates the Project's potential to conflict with the plans, programs, ordinances, and policies listed in Table 2.1.1 of the July 2019 TAG are based, in part, on the questions in Table 2.1.2 of the July 2019 TAG. In accordance with the TAG, a project that generally conforms with, and does not obstruct, the City's development plans, programs, ordinances, and policies is generally considered to be consistent.

(3) Freeway Safety Analysis

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

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. The 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.

If a potential safety issue is identified, then, to offset this potential condition, a project should consider preferred corrective measures, including TDM strategies, to reduce the project's trip generation, investments in active transportation or transit system infrastructure to reduce the project's trip generation, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to demonstrate substantial safety benefits, not be a VMT inducing improvement, and not result in environmental issues.

(4) Vehicle Miles Traveled

(a) VMT Impact Thresholds

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds. As discussed above, the CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG in July 2019, which is the version of the TAG that applies to this Draft EIR and is therefore used in the Transportation Assessment, included as Appendix J.1 of this Draft EIR, and the impact analysis herein.²¹ Threshold T-2.1 (Causing Substantial VMT) of the TAG states that a residential project would result in a significant VMT impact if it 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. Similarly, a commercial project would result in a significant VMT impact if it would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC area in which the project is located.

Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT. Accounting for a 15 percent reduction from the APC averages, the TAG identifies a daily household VMT per capita impact threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6 for the Central Los Angeles APC (Central LA APC)—the APC in which the Project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 6.0 and average work VMT per employee be equal to or lower than 7.6, the Project's overall VMT impact would be less than significant.

²¹ *The July 2019 version of the TAG is the version that applies to this Project as it was the version in effect when the Notice of Preparation (NOP) was circulated, was the version evaluated in the Transportation Assessment, and is the version cited in LADOT's August 5, 2020, letter approving the Transportation Assessment. As such, the July 2019 version of the TAG is applied in this analysis.*

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

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

The location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of *Technical Advisory on Evaluating Transportation Impacts in CEQA*.²² Therefore, as detailed in *City of Los Angeles VMT Calculator Documentation* (VMT Calculator Documentation), the City's household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, and the work VMT per employee threshold applies to Home-Based Work Attraction trips.²³

The VMT Calculator defines other types of trips generated by a project, which include Non-Home-Based Other Production (i.e., trips to a non-residential destination originating from a non-residential use at the Project Site), Home-Based Other Attraction (i.e., trips to a non-workplace destination at the Project Site originating from a residential use), and Non-Home-Based Other Attraction (i.e., trips to a non-residential destination at the Project Site originating from a non-residential use). These trip types are not factored into the VMT per capita and VMT per employee thresholds, because these trip types are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, to ensure a conservative analysis for the Project, these trip types were factored into the calculation of total Project VMT for screening purposes when determining whether a VMT analysis for the Project would be required.

(b) VMT Analysis Methodology

LADOT developed City of Los Angeles VMT Calculator Version 1.2 (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with the TAG.

²² California Governor's Office of Planning and Research, December 2018.

²³ City of Los Angeles Department of Transportation and Department of City Planning, February 2019.

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

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

The VMT Calculator determines a Project's TBZ based on the latitude and longitude of the project address. The Project Site is located in an Urban (Zone 4) TBZ.

The VMT Calculator determines a project's VMT based on trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the Project's VMT. As detailed in the VMT Calculator Documentation, the VMT Calculator also accounts for the interaction of land uses within a mixed-use development in the calculation of the project's VMT (which is relevant to the proposed Project given its mixed-use nature).

(c) Population and Employment Assumptions

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

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

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

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in *Quantifying Greenhouse Gas Mitigation Measures*.²⁴

(5) Hazardous Geometric Design Features

A review of Project access points, internal circulation, and parking access was performed to determine if the Project would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts. This analysis considered the following factors: (a) the relative amount of pedestrian activity at Project access points; (b) design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site and the visibility of cars to pedestrians and bicyclists; (c) the type of bicycle facilities the Project driveway(s) cross(es) and the relative level of utilization; (d) the physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts; (e) the Project location, or Project-related changes to the public right-of-way, relative to proximity to the High Injury Network or a Safe Routes to School program area; and (f) any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

²⁴ *California Air Pollution Control Officers Association, 2010.*

(6) Emergency Access

In consultation with the Los Angeles Fire Department (LAFD), the analysis of the Project's potential access impacts includes a review of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination is made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede emergency access on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

Project Design Feature TR-PDF-1: A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval, prior to commencing construction. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification to adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker and equipment parking on adjacent streets.
- Temporary pedestrian and bicycle traffic controls during all construction activities adjacent to Olive Street, 4th Street, and Hill Street to ensure pedestrian, bicycle and motor vehicle traffic safety on public rights-of-way.
- Provide traffic and sidewalk controls during construction activities adjacent to Angels Flight to ensure pedestrian safety on public rights-of-way and continued public access to Angels Flight rail operations.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities, including but not limited to associated truck deliveries and haul trips, to reduce the effect on traffic flow on surrounding arterial streets during peak commute hours.

- Potential sequencing of construction activity for the Project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Coordination of Project construction activities with Angels Flight so as not to substantially impact Angels Flight Operations.

Project Design Feature TRA-2: To ensure the safety of pedestrians when crossing the proposed Project driveways: (1) Project driveways will remain clear of hardscapes, vegetation, or signage that could impede sight lines; and (2) sidewalk treatments will be provided across the driveways, such as pavement textures, colors, additional lighting, or other informative features that distinguish the driveway.

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 lists the following plans, policies, and programs as relevant to analysis under Threshold (a): Mobility Plan 2035; Central City Community Plan; Bunker Hill Specific Plan; Plan for a Healthy Los Angeles; LAMC; Vision Zero; Citywide Design Guidelines; Walkability Checklist; Mobility Hub Reader's Guide; LADOT Manual of Policies and Procedures (Design Guide); and SCAG 2016–2040 RTP/SCS. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

(a) Mobility Plan 2035

A detailed analysis of the Project's consistency with the policies in the Mobility Plan 2035 is provided in Table C-2 in Appendix C of the Transportation Assessment, included as Appendix J.1 of this Draft EIR, with additional discussion and analysis provided in Section IV.F, Land Use, of the Draft EIR. A summary of the analysis from the Transportation Assessment is provided below.

In terms of safety, the Project's design would include pedestrian enhancements along the perimeter of the Project Site, with expanded pedestrian walkways and a paseo accessible from public sidewalks, thereby allowing pedestrians to filter through the public areas of the site without crossing vehicle paths. Separate pedestrian and bicycle access to the Project Site would be provided via entrances along Olive Street, 4th Street, and Hill Street to reduce conflicts with vehicles. The Project would not modify, remove, or

otherwise affect existing bicycle infrastructure, and the Project driveways are not proposed along any street with a bicycle facility. All right-of-way, roadway, and dedication widths would be designed to meet the Mobility Plan standards. Thus, the Project would provide safe access for all users regardless of mode of choice and would be consistent with the Safety First objective of the Mobility Plan.

The design of the Project's transportation infrastructure would provide pedestrian and bicycle connectivity, along with limited but functional vehicle driveways. On the north side of the property, the Angels Flight funicular travels between Hill Street and Olive Street. A stairway within the Project Site runs parallel to the funicular tracks and would be improved with a larger entry with integrated theater-style seating on the Hill Street side and an expanded, terraced landing on the Olive Street side to provide an overlook of Angels Flight. The Metro portal located at the southeast corner of the Project Site would not be encroached upon by Project development, and the surrounding area would be improved with landscaping features, pedestrian amenities, short-term bicycle parking, overlook areas, benches and moveable seating, and garden terraces to provide an inviting pedestrian destination to encourage use of the rail system and amenities. These features would adhere to Metro's requirements for safety, security, accessibility, operations, and maintenance. Paseos that traverse the Project Site internally could be accessed from the public sidewalks along 4th and Olive Streets, breaking up the existing long stretches of unprotected concrete paths and incorporating landscaping, lighting, and comfortable amenities throughout the property. Truck loading areas for the Project would be limited, accessed from Olive Street, and contained within the proposed on-site parking structure, which would reduce the potential for conflict between truck loading and pedestrian access around the frontages of the Project. The Project would maintain the designated driveway and roadway width requirements of the Mobility Plan and would not preclude future roadway improvements proposed in the Mobility Plan. Given the proposed vehicular and pedestrian facilities and connections, the Project would be consistent with the World Class Infrastructure goal of the Mobility Plan (e.g., a well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices).

The Project would also encourage multi-modal transportation alternatives and access for all travel modes to and from the Project Site. The Project would provide separate porte-cochères for residential and hotel passenger loading on-site via the two proposed driveways, as well as short- and long-term bicycle parking to encourage non-motorized travel. The Project would promote transit usage by locating mixed uses atop a Metro station portal and adjacent to a Metro bus stop along Hill Street and by offering improved, direct pedestrian linkages. The Project would support residents, hotel guests, employees, and visitors who choose to travel by automobile through the provision of driveways along Olive Street and 4th Street, on-site passenger loading, separate commercial loading, and adequate parking supply to serve demand. All sidewalks, curb

ramps, and passages along the Project frontage would meet ADA standards, providing accessibility for all. In addition, the Project would encourage interaction between components within a walkable environment in close proximity to jobs, destinations, and the multitude of neighborhood services available in Downtown. Thus, the Project would be consistent with the Access for All Angelenos objective of the Mobility Plan.

As detailed in Section 3B of the Transportation Assessment, included as Appendix J.1 of this Draft EIR, the Project would implement and promote TDM strategies to reduce the dependency on single-occupancy vehicles, provide safe and convenient bicycle parking, improved pedestrian networks, and encourage use of transit through enhanced connectivity to existing services. Sufficient off-street parking would be provided consistent with the land use objectives and estimated parking demand. Thus, the Project would be consistent with the Collaboration, Communication, and Informed Choices objective of the Mobility Plan.

To respond to the Mobility Plan's Clean Environments and Healthy Communities objective, the Project's mix of uses would promote interaction between on-site components as well as other Downtown attractions, thereby reducing the overall VMT. Additionally, the Project's design would encourage active transportation for a healthier lifestyle by incentivizing bicycling and walking which would contribute to individual health as well as a reduction of vehicle pollutants.

The above discussion highlights the Project characteristics that specifically support policies in the Mobility Plan, as detailed in Table C-2 in Appendix C of the Transportation Assessment, included as Appendix J.1 of this Draft EIR. Additionally, the Project would not hinder other goals and policies identified in the Mobility Plan. Therefore, the Project would be consistent with, and would not obstruct the implementation of, the Mobility Plan.

(b) Plan for a Healthy Los Angeles

A detailed analysis of the Project's consistency with the transportation-related policies in the *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan* is provided in Table C-3 in Appendix C of the Transportation Assessment included as Appendix J.1 of this Draft EIR, and a broader analysis of Project consistency with other applicable policies set forth in the Plan for a Healthy Los Angeles is provided in Section IV.F, Land Use, of this Draft EIR. In summary, the Project would prioritize safety and access through improved pedestrian passages and connectivity to transit and would encourage healthy living by promoting bicycling and walking. The Project includes a mix of market rate and affordable housing units, along with local-serving commercial areas. The Project does not displace any existing housing; rather, it converts empty land into an active and vibrant mixed-use community with a high-density residential component. Furthermore, as discussed later under Threshold (b), the Project would generate lower VMT per capita

for residents and employees than the average for this area, thus reducing air pollutants that may affect vulnerable people. Therefore, the Project would be consistent with, and would not obstruct the implementation of, the transportation-related policies recommended in the Plan for a Healthy Los Angeles.

(c) Central City Community Plan

A detailed analysis of the Project's consistency with the transportation-related policies in the Central City Community Plan is provided in Table C-4 in Appendix C of the Transportation Assessment, included as Appendix J.1 of this Draft EIR, with additional discussion and analysis provided in Section IV.F, Land Use, of the Draft EIR. In summary, the Project would expand housing opportunities near accessible transit, encourage a mix of land uses to create an active destination, provide traditional and non-traditional sources of open space, support high levels of transit use, and provide employment opportunities. The Project would also incorporate commercial uses on the ground floor fronting adjacent streets, provide bicycle parking and amenities on-site, and enhance existing pedestrian activity. Landscaped corridors would be implemented through the planting of street trees and other landscaped elements along the perimeter of the Project Site. As further discussed under Threshold (b) below, the Project would also implement TDM measures that would encourage residents, employees, and patrons of the Project to utilize alternative modes of travel.

The Project would actively promote pedestrian activity and engagement with the surrounding community and would not hinder other goals and policies identified in the Community Plan. Therefore, the Project would be consistent with, and would not obstruct the implementation of the policies recommended by, the Community Plan.

(d) Bunker Hill Specific Plan

As discussed further in Section IV.F, Land Use, of this Draft EIR, the Project would be consistent with the permitted land uses identified in the Specific Plan, including multi-family residential units, commercial uses, outdoor eating areas, transit stations and related facilities, and hotels. Also, the Project's design would be consistent with the goals of the Specific Plan as the Project would create a 24-hour Downtown environment at the Project Site, expand housing opportunities and commercial retail space, provide employment opportunities, provide connections between public open spaces and pedestrian pathways, and create a transit-friendly environment through active ground floor uses and pedestrian-oriented design. Therefore, the Project would be consistent with, and would not obstruct the implementation of, the goals, objectives, policies, and requirements of the Bunker Hill Specific Plan.

(e) *Los Angeles Municipal Code*

(i) *LAMC Section 12.21 A.16*

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. The Project's proposed bicycle parking short-term and long-term supply would satisfy the LAMC requirement for the Project by providing 105 short-term bicycle parking spaces and 270 long-term bicycle parking spaces within the Project's on-site parking facility. Therefore, the Project would be in compliance with LAMC Section 12.21 A.16.

(ii) *LAMC Section 12.26 J*

LAMC Section 12.26 J, the TDM Ordinance, establishes trip reduction requirements for projects with new non-residential floor area. The Project would incorporate City-required TDM measures as part of the Project design aimed at encouraging the use of alternative transportation modes in line with the requirements set forth in the TDM Ordinance. Therefore, the Project would be in compliance with LAMC Section 12.26 J.

(iii) *LAMC Section 12.37*

LAMC Section 12.37 includes the Highway and Collector Street dedication and improvement requirements for the public right-of-way. The Project would include an approximately three-foot dedication along Olive Street to meet the Mobility Plan standards. All other street frontages are already fully dedicated. Therefore, the Project would be in compliance with LAMC Section 12.37.

(f) *Vision Zero*

As indicated previously, the Project Site is not located adjacent to any streets identified in the City's High Injury Network, and no Vision Zero Safety Improvements are planned in the vicinity. As illustrated in Figure IV.J-1 on page IV.J-8, the closest streets to the Project Site on the High Injury Network are Broadway and 5th Street located one block to the east and south, respectively. Furthermore, the Project would include pedestrian improvements in accordance with City requirements; would separate pedestrian, bicycle, and automobile traffic; and would not preclude future Vision Zero Safety Improvements by the City. Therefore, the Project would not conflict with Vision Zero.

(g) *Citywide Design Guidelines*

A detailed analysis of the Project's consistency with transportation-related guidelines from the Citywide Design Guidelines is provided in Table C-6 of Appendix C of the Transportation Assessment included as Appendix J.1 of this Draft EIR. As indicated in the Transportation Assessment, the Project design includes accessible sidewalks, pedestrian

amenities, and well-designed vehicular access driveways in accordance with the City's design considerations. The Project's design also includes pedestrian enhancements along the perimeter of the Project Site, new pedestrian walkways, and a pedestrian paseo. In addition, adequate sidewalks along Olive Street and 4th Street would be provided in accordance with the City's Living Streets design considerations. For example, canopy trees and other landscaping elements would be incorporated to provide adequate shade and habitat to provide a more comfortable mobility environment for pedestrians. Furthermore, the orientation of the active ground floor uses would ensure that the Project actively engages with the street and its surrounding uses. Therefore, the Project would align with Guidelines 1 through 3.

The Project design would also include elements that reinforce orientation to the street, such as glass windows and easily recognizable entrances. The Project would provide landscaped spaces along 4th Street and Hill Street, enhancing the pedestrian experience of the Project Site. Therefore, the Project would align with the 360-Degree Design goal.

The Project would incorporate elements of shade, natural light, and ventilation as considerations in the building orientation and design. Furthermore, the Project would incorporate trees and landscaped areas to provide shaded spaces for community benefits. Therefore, the Project would align with the Climate-Adapted Design goal.

Lastly, the Citywide Design Guidelines include the following Pedestrian-First Design guidelines:

- Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project design includes accessible sidewalks, pedestrian amenities, and well-designed vehicular access driveways in accordance with Guideline 1. The Project design also includes pedestrian enhancements along the perimeter of the Project Site, new pedestrian walkways, and a pedestrian paseo. In addition, adequate sidewalks along Olive Street and 4th Street would be provided in accordance with Guidelines 1 and 2 and the City's Living Streets design considerations. Canopy trees and other landscaping elements would also be incorporated to provide adequate shade and habitat to provide a more comfortable mobility environment for pedestrians at an appropriate scale in accordance

with all three guidelines. Further, the orientation of the Project design and active ground floor facilities would ensure that the Project actively engages with the street and its surrounding uses in accordance with Guidelines 3. Thus, the Project would align with the Pedestrian-First Design guidelines.

Based on the above, the Project would align with Citywide Design Guidelines to provide a safe, comfortable, and accessible experience for all transportation modes. Therefore, the Project would be consistent with the Citywide Design Guidelines. Refer to Section IV.F, Land Use and Planning, of this Draft EIR, for additional analysis of the Project's consistency with the Citywide Design Guidelines.

(h) Walkability Checklist

As indicated previously, the City's Walkability Checklist serves as a guide for creating improved conditions for pedestrians to travel and contribute to the overall walkability of the City. The Walkability Checklist includes the following transportation-related topics: sidewalks; crosswalks/street crossings; on-street parking; building orientation; and off-street parking and driveways.

A detailed analysis of the Project's consistency with the Walkability Checklist is provided in Table C-7 of Appendix C of the Transportation Assessment included as Appendix J.1 of this Draft EIR. The Project would incorporate many of the recommended strategies applicable to residential and commercial developments, including but not limited to: providing continuous and adequate sidewalks along the Project Site; enhancing pedestrian amenities through additional pedestrian pathways and paseos; providing canopy trees and other landscape elements to provide adequate shade for a more comfortable mobility environment for pedestrians; designing primary entrances with direct, visible access for pedestrians and ADA accessibility; and locating parking underground rather than exposed to those traveling on adjacent streets. As such, the Project would be consistent with the goals of the Walkability Checklist. Refer to Section IV.F, Land Use and Planning, of the Draft EIR, for additional analysis of the Project's consistency with the Walkability Checklist.

(i) LADOT's Transportation Technology Strategy and Design Standards

As indicated previously, LADOT's *Urban Mobility in a Digital Age: A Transportation Technology Strategy for Los Angeles* and *Technology Action Plan* is intended to ensure the City stays on top of and implements emerging transportation technologies as both a regulator and a transportation service provider. The Project would not interfere with any of the general policy recommendations, pilot proposals, or action steps set forth in these documents. Additionally, the Project would comply with all applicable LADOT design

standards and would comply with the policies and procedures in LADOT's Manual of Policies and Procedures.

(j) Mobility Hub Reader's Guide

As indicated previously, the Mobility Hub Reader's Guide provides guidance for enhancing transportation connections and multi-modal improvements in proximity to new or existing transit stations. The Project adopts several of these components, including bicycle parking that facilitates and encourages bicycling in and around the Project, designs that integrate pedestrian connections to the existing Metro portal, and ground-floor active uses that support a vibrant and mixed-use environment including a retail land use component. Therefore, the Project would be consistent with, and would not obstruct the implementation of, the Mobility Hub Reader's Guide.

(k) Other Plans and Policies

As discussed in detail in Section IV.F, Land Use and Planning, of this Draft EIR, the Project would not conflict with applicable SCAG RTP/SCS policies related to encouraging pedestrian activity and reducing VMT.

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. Therefore, the Project's transportation plan consistency impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

The City's VMT Calculator was used to evaluate Project VMT for comparison to the VMT impact criteria. As indicated previously, the Project Site is located in an Urban (Zone 4) TBZ and is within the Central APC. The VMT Calculator was set up with the proposed land uses and respective floor areas as the primary input (i.e., 432 multi-family housing units, 515 hotel rooms (along with associated meeting room and hotel restaurant space), 72,091 square feet of general commercial uses. Specific to the Project, the VMT Calculator takes in consideration the internal interaction between the different land uses on-site. The Project location also considers the adjacent Metro portal, connectivity of walking or driving among different activities, and convenient trip destinations in the urban core of Downtown Los Angeles. The Project land use and location information factors are key features that materially reduce single-occupancy vehicle trips. While City-required TDM measures would be incorporated, these measures were not taken into consideration in the VMT evaluation which provides a conservative analysis.

The VMT analysis results based on the VMT Calculator are summarized in Table IV.J-1 on page IV.J-36. Detailed output results from the VMT Calculator are provided in Appendix D of the Transportation Assessment, included as Appendix J.1 of this Draft EIR. As shown, the VMT Calculator estimates that the Project would generate a daily VMT of 40,033. Based on the population and employee estimates for the Project, the Project would generate an average Household VMT per capita of 3.9 and an average Work VMT per employee of 7.3, both of which fall below the significance thresholds for the Central APC (6.0 and 7.6, respectively). The Project's TDM strategies would further reduce the Project's VMT per capita and VMT per employee.

In addition, the Project includes several design features considered as TDM strategies to reduce the number of single occupancy vehicle trips to the Project Site, including compliance with the relatively low minimum vehicle parking requirements contained in the Specific Plan, provision of bicycle parking per LAMC requirements, and enhancement to pedestrian and bicycle amenities on-site. The Project would also implement City-required TDM measures. For the purposes of providing a conservative analysis, these TDM measures were not taken into consideration in the VMT evaluation.

Based on the above, the Project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Therefore, the Project's VMT impacts would be less than significant.

(2) Mitigation Measures

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

**Table IV.J-1
VMT Analysis Summary^a**

	Size
Project Land Uses	
Multi-Family Housing	432 units
Hotel	515 rooms
Retail	28,836 sf
Quality Restaurant	21,267 sf
High-Turnover Sit-Down Restaurant	21,267 sf
Project Analysis	
Resident Population	973
Employee Population	488
Project Area Planning Commission	Central
Travel Behavior Zone	Urban
Maximum VMT Reduction	75%
VMT Analysis	
Daily Vehicle Trips	5,410
Daily VMT	40,033
Total Household VMT	3,767
Household VMT per Capita	3.9
Impact Threshold	6.0
Significant Impact	No
Total Work VMT	3,553
Work VMT per Employee	7.3
Impact Threshold	7.6
Significant Impact	No
<hr/> <i>sf = square feet</i> ^a See Table 5 of the Transportation Assessment, included as Appendix J.1 of this Draft EIR, for extensive footnotes. Source: Gibson Transportation Consulting, Inc., May 2020.	

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

Impacts regarding the potential to increase of hazards due to a geometric design feature generally relate to the design of access points to and from a project site and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections.

Further evaluation is required for projects that that require a discretionary action and: (1) propose new driveways or introduce new vehicle access to the property from public right-of way; or (2) propose any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.).²⁵ The Project requires further evaluation based on these screening criteria.

A review of Project access points, internal circulation, and parking access was performed to determine if the Project would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts. This analysis considered the following factors: (1) changes to the applicable public rights-of-way that could increase hazards; (2) design features/physical configurations that could affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site and the visibility of cars to pedestrians and bicyclists; (3) the physical conditions of the site (in this particular case, physical terrain) that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts; (4) the relative amount of pedestrian activity at Project access points; and (5) the type of bicycle facilities the Project driveway(s) would cross and the relative level of utilization.

(a) Public Rights-of-Way

As previously indicated, the Project Site is not located adjacent to a street identified as part of the High Injury Network, and the Safe Routes to School map does not identify any infrastructure improvement projects within the Study Area.

²⁵ LADOT, *Traffic Analysis Guidelines (TAG)*, July 2019), Section 2.4.2 Screening Criteria. Note that the Transportation Assessment, included as Appendix J.1 of this Draft EIR, uses the 2019 TAG rather than the 2020 TAG because: (1) it was the version in effect when the Notice of Preparation (NOP) was circulated; and (2) it is the version cited in LADOT's August 5, 2020, letter approving the Transportation Assessment.

The proposed new driveway along Olive Street would require curb cuts onto public right-of-way. Currently, there are nine metered parking spaces along Olive Street; some of the parking spaces would be removed to accommodate the curb cut and associated sight distance needs. Thus, sight distance from this Project driveway would be enhanced by eliminating vehicle parking close to this driveway. Furthermore, access to the loading dock would also require the installation of a new curb cut along Olive Street. These features would be located approximately 100 feet apart, providing adequate pedestrian refuge between the two driveways. All heavy truck maneuvers would occur on-site from Olive Street.

The proposed driveway along 4th Street would require the installation of a new curb cut onto public right-of-way. Currently, there are nine metered parking spaces along Olive Street and 10 metered parking spaces along 4th Street. Some of these parking spaces would be removed to accommodate the curb cut and associated sight distance needs. Thus, sight distance from the this driveway would be enhanced by eliminating vehicles parked close to this driveway. The six metered parking spaces along Hill Street adjacent to the Project Site would not be affected as no Project driveway is proposed along this street.

Olive Street requires a 96-foot right-of-way width and 66-foot roadway width, while 4th Street requires an 81-foot right-of-way width and 51-foot roadway width. As indicated under the consistency analysis with the LAMC above, the Project would include an approximately three-foot dedication along Olive Street to meet the Mobility Plan standards. All other street frontages are already fully dedicated. The Project would improve the sidewalks surrounding the Project Site as part of the proposed redevelopment activities. The sidewalks and public rights-of-way would comply with the applicable street standards of the Mobility Plan. Therefore, the Project would maintain the designated driveway and roadway width requirements indicated in the Mobility Plan, and would not preclude future roadway improvements proposed in the Mobility Plan.

(b) Driveway Design Features

Adjacent to the Project Site, 4th Street (one-way eastbound) provides four travel lanes. The proposed 4th Street driveway would be located approximately 210 feet from approaching traffic on Olive Street and approximately 130 feet west of Hill Street and would accommodate left-turn ingress and egress maneuvers only. The sidewalk width is proposed at 15 feet with a three-foot sidewalk easement that meets the Mobility Plan standard. The driveway width is proposed at approximately 30 feet, consistent with City design standards. While a vertical rise in terrain occurs from Hill Street to Olive Street, this driveway would intersect at a right angle to 4th Street and would not include any hardscape features, walls, or landscaping that would obstruct sight distance or the visibility of approaching vehicles, pedestrians, or bicycles.

Olive Street provides five travel lanes adjacent to the proposed Project driveway, with three northbound lanes (from 3:00–7:00 P.M.) and two southbound lanes, as well as a two-way left-turn median. This driveway would be located approximately 80 feet north of 4th Street and would accommodate both left and right-turn ingress and right-turn egress maneuvers (with no left turns out of the driveway due to proximity to the intersection of Olive Street and 4th Street). The driveway width is proposed at approximately 30 feet, consistent with City design standards. The sidewalk width is proposed at 15 feet with a three-foot sidewalk easement, consistent with design standards. While this driveway is positioned on a vertical rise within Olive Street, the sight lines would allow for more than 300 feet of unobstructed view, and no features or design elements are proposed that would impede the ability of drivers to see oncoming vehicles, pedestrians, or bicycles.

No Project driveways would be constructed on Hill Street. Also, the sidewalk width along the Project Site's Hill Street frontage is proposed at 15 feet with a three-foot sidewalk easement consistent with City design standards.

All Project driveways would be located near existing signalized traffic signals at the intersections of Olive Street, 4th Street and Hill Street. There are also signalized midblock crosswalks along Olive Street and Hill Street that would be retained. The traffic signals and midblock crosswalks would reduce conflicts and confusion between all road users by providing marked crosswalks with walk signals and countdown timers.

(c) Physical Terrain

The Project Site is located on a slope between Hill Street (low side) and Olive Street (elevated side), which creates vertical rises at all vehicle driveways. However, as stated previously, the vertical rises do not restrict sight lines within 300 feet of the driveways, allowing drivers to safely identify approaching vehicles, pedestrians, and bicycles before committing to turn. Driveways would be designed to intersect the sidewalk and street at right angles with adequate building setback to allow pedestrians and bicyclists to observe vehicles within the driveways. Also, the Project would provide private and public open space, landscaped elements, and street trees for shade along the Project perimeter and within the Project Site to create a walkable and attractive pedestrian environment. Pedestrian sidewalks would continue to be provided on all sides fronting the Project Site. Hence, the Project Site's terrain would not contribute to hazardous conditions.

(d) Pedestrian Activity

The Project proposes new driveways along Olive Street and 4th Street, both of which are designated Modified Avenue II in the Mobility Plan and identified as part of the Pedestrian Enhanced Network. Count data from November 2019 shows approximately 100 pedestrians per peak hour, or less than two per minute, traverse the location of the

proposed 4th Street driveway. Vehicular volumes at the driveway are expected to occur at a rate of about five cars per minute in the morning peak hour and 10 cars per minute in the evening peak hour. No unusual queuing issues are evident with this driveway design, particularly as some turn movements would be restricted due to the one-way operation of 4th Street, resulting in fewer conflicting travel movements.

Count data from November 2019 also shows approximately 50 pedestrians per peak hour, or less than one per minute, cross the location of the proposed Olive Street driveway. Vehicular volumes at the driveway are expected to occur at a rate of about three cars per minute in the morning peak hour and less than two cars per minute in the evening peak hour. No unusual queuing issues are evident with this driveway design, particularly with no left-turn egress, resulting in fewer conflicting travel movements. The Project would also provide separate porte-cochères for residential and hotel passenger loading on-site and would not use public right-of-way for curbside loading.

Due to the location of the Project and its access to the adjacent Metro portal and other transit, pedestrian volumes are expected to increase on and around the Project Site. This increased pedestrian activity would not result in an adverse impact, and instead would represent a beneficial effect of the Project. To facilitate pedestrian activity around the Project Site, the design of the Project includes TR-PDF-2 which would ensure that: (1) all Project driveways remain clear of hardscapes, vegetation, or signage that would impede sight lines; and (2) sidewalk treatments are provided across the driveways, such as pavement textures, colors, additional lighting, or other informative features that distinguish the driveways. This project design feature would enhance the safety of pedestrians when crossing the driveways located on the Project Site.

(e) Bicycle Facilities

Currently, there are no bicycle facilities adjacent to the Project Site. Additionally, no streets adjacent to the Project Site have been identified as part of the Mobility Plan's Bicycle Network. Based on existing intersection volume data collected in November 2019, it was observed that Olive Street, 4th Street, and Hill Street carry fewer than 35 bicycles during the entire span of the 6-hour commuter peak period (7:00–10:00 A.M. and 3:00–6:00 P.M.), as detailed in Appendix C of the Transportation Assessment, included as Appendix J.1 of this Draft EIR. Therefore, given the minimal bicycle traffic, the driveways would not pose a safety hazard to bicyclists.

(f) Incompatible Uses

With regard to the potential to increase hazards due to incompatible uses, as described in Section III, Environmental Setting, of this Draft EIR, the area surrounding the Project Site includes primarily residential, office, hotel, and commercial uses. The Project

proposes residential, hotel and commercial uses and thus would generate similar types of traffic (e.g., automobile and commercial delivery traffic) as the surrounding uses; it would not include uses that generate farm equipment traffic or other types of non-compatible traffic. Therefore, the Project would not substantially increase hazards due to incompatible uses (e.g., farm equipment).

Based on the above, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections), and impacts would be less than significant.

(g) Caltrans Safety Analysis

Based on the Project's trip generation estimates and traffic distribution pattern detailed in the Transportation Assessment, included as Appendix J.1 of this Draft EIR, the Project would add 25 or more peak-hour trips to the following three off-ramps during the morning and afternoon peak hours:

- SR 110 Southbound Off-Ramp to 4th Street
- SR 110 Northbound Off-Ramp to 4th Street
- SR 110 Northbound Off-Ramp to 6th Street

In accordance with the applicable methodology, the 95th percentile ramp queue was calculated using the *Highway Capacity Manual, 6th Edition* (HCM) methodology.²⁶ Conditions were analyzed for the anticipated Project full occupancy year of 2028, which includes growth and traffic from other related projects, both with and without Project traffic. The summary of queue lengths and off-ramp storage length, along with all analysis worksheets, are provided in Appendix E of the Transportation Assessment included as Appendix J.1 of this Draft EIR.

The northbound and southbound off-ramps to 4th Street merge into the eastbound arterial street and provide two additional through lanes. Traffic operates at free-flow conditions until the signalized intersection of Lower Grand Avenue and 4th Street, located approximately 1,200 feet east of the merge point. Thus, the reported 95th percentile queue at the two off-ramps, shown in Appendix Table E-1 of the Transportation Assessment included as Appendix J.1 of this Draft EIR, are based on the eastbound queue from the signalized intersection stop bar. Although, the individual 95th percentile queue for each off-ramp cannot be determined for the 4th Street ramp connectors due to the uncontrolled merge points, each off-ramp has more

²⁶ *Transportation Research Board, 2016.*

than sufficient storage length to accommodate cumulative traffic, both without and with Project traffic.

As shown in Appendix Table E-1 of the Transportation Report, under Future with Project Conditions, the queue at the northbound off-ramp to 6th Street would not exceed the ramp storage length during any of the analyzed peak hours and would therefore not be subject to a speed differential analyses.

Based on the above, the queues at the three off-ramps would not extend onto the freeway mainline. Therefore, the Project would not substantially increase hazards at Caltrans facilities, and impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction Impacts

While most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction fences could encroach into the public right-of-way (e.g., sidewalks and/or roadways) adjacent to the Project Site on 4th Street, Olive Street, and/or Hill Street. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would not be impeded. In addition, as required by the Construction Management Plan included as TR-PDF-1: construction worker and equipment parking would be prohibited on adjacent streets; temporary pedestrian and bicycle traffic controls would be implemented on Olive Street, 4th Street, and Hill Street during the construction period to ensure traffic safety within the public rights-of-way; temporary traffic controls would be implemented to improve traffic flow around the Project Site during the

construction period; construction activities and associated traffic would be scheduled to reduce traffic flow on the surrounding streets during peak commute hours to the extent feasible; and construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections). These measures would ensure emergency access (and minimize impacts to emergency response times) during the construction period. **Therefore, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.**

(b) Operational Impacts

As described above, vehicular access to the Project Site would be provided via new driveways along Olive Street and 4th Street. Furthermore, emergency access to the Project would be available on three sides from along Olive Street, Hill Street, and Olive Street. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and inspection for new construction projects, as set forth in LAMC Section 57.118, which are required prior to the issuance of a building permit. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operation of the Project. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Therefore, the Project would not result in inadequate emergency access during operation, and impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level 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

(1) Impact Analysis

(a) Consistency with Transportation Plans and Policies

In accordance with the TAG, the cumulative analysis of consistency with transportation plans and policies must include consideration of any related projects within 0.25 mile of the Project Site and any transportation system improvements in the vicinity. As indicated in Table III-1 in Section III, Environmental Setting, of this Draft EIR, nine of the 50 related projects (e.g., Related Projects Nos. 1–5, 7, and 9–11) are located within a 0.25-mile radius (e.g., approximately three blocks east and west, and two blocks north and south) of the Project Site.

The majority of the programs, plans, policies, and ordinances reviewed under Threshold (a) above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21 A.16 and the TDM Ordinance from LAMC Section 12.26 J apply to Projects individually. Also, in many cases, the Project (which would be larger than the nine identified related projects and would provide a mix of land uses) would specifically support key policies such as enhancing pedestrian infrastructure, while the nearby related projects would not be expected to interfere with such policies. In addition, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Collectively, the Project and the related projects would represent infill development and would add high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity, which would satisfy many of the applicable transportation plans and policies. Lastly, as indicated in the analysis under Threshold (a) above, the Project would be consistent with the applicable transportation plans and policies. **As such, the Project's transportation plan consistency impacts would not be cumulatively considerable, and thus cumulative transportation plan consistency impacts would be less than significant.**

(b) CEQA Guidelines Section 15064.3 (VMT Analysis)

The TAG provides that the cumulative effects of development projects are determined based on the consistency with the air quality and GHG reduction goals of 2016–2040 RTP/SCS. Projects that are consistent with the RTP/SCS in terms of development location, density, and intensity are considered part of the regional solution for meeting air pollution and GHG goals, including the goal to reduce VMT. In addition, the TAG provides that projects which do not result in a significant VMT impact would be in alignment with the RTP/SCS and would have either no or a less than significant cumulative VMT impact. As indicated in the Project analysis under Threshold (b) above, the Project would have a less than significant VMT impact. Furthermore, as evaluated in Section IV.A,

Air Quality, of this Draft EIR, the Project would be consistent with the 2016–2040 RTP/SCS. **As such, the Project’s VMT impacts would not be cumulatively considerable, and thus cumulative VMT impacts would be less than significant.**

(c) Hazardous Design Features

According to the TAG, a cumulative impact analysis for potential geometric design or land use hazards should consider the effect of access to related projects in the same block as the Project Site. However, there are no related projects on the same block as the Project. As indicated in Figure III-1 in Section III of this Draft EIR, the nearest related Project is Related Project No. 1 (Equity Residential Mixed-Use) located across Hill Street from the Project Site, and no Project driveways are proposed along Hill Street. Traffic from the related projects, which was accounted for in the analysis of operating conditions, in some cases would affect the amount of traffic on the street adjacent to the Project Site but would not influence the design of the proposed Project driveways along Olive Street and 4th Street. The Project would have less than significant impacts relative to hazardous design features and incompatible uses as evaluated under Threshold (c) above. **As such, the Project’s hazardous design feature impacts would not be cumulatively considerable, and thus cumulative hazardous design feature impacts would be less than significant.**

(d) Inadequate Emergency Access

As with the proposed Project, any driveway and circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD’s fire/life safety plan review and inspection for new construction projects, as set forth in Section 57.118 of the LAMC, which are required prior to the issuance of a building permit. Moreover, the additional traffic generated by the related projects would be dispersed throughout the Study Area and would not be concentrated to a specific location. Furthermore, as previously discussed, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, like the Project as evaluated under Threshold (d) above, the related projects would not result in inadequate emergency access. **As such, Project emergency access impacts would not be cumulatively considerable, and thus cumulative emergency access impacts would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to consistency with adopted transportation plans and policies, CEQA Guidelines Section 15064.3 (VMT), hazardous geometric design features and incompatible uses, and inadequate emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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