# IV. Environmental Impact Analysis

# K. Transportation

## 1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is primarily based on the *Traffic Assessment for the Morrison Mixed-Use Project*[1] (Traffic Assessment) prepared for the Project, and included in its entirety in **Appendix J.1** of this Draft EIR.

The analysis of Vehicle Miles Traveled (VMT) is based on the Traffic Assessment. The Traffic Assessment was prepared pursuant to the Los Angeles Department of Transportation (LADOT)'s Transportation Assessment Guidelines (July 2019 and 2020) which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated CEQA guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Traffic Assessment was approved by LADOT on June 10, 2021. A copy of LADOT's Assessment Letter for the Traffic Assessment is included as **Appendix J.2** of this Draft EIR.

## 2. Environmental Setting

### a) Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding transportation at the federal, state, regional, and City of Los Angeles levels. As described below, these plans, guidelines, and laws include:

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

[1] *Overland Traffic Consultants, Inc., Traffic Assessment for the Morrison Mixed-Use Project Located at 1220-1246 S. Hope Street and 427-435 Pico Boulevard in the City of Los Angeles, September 2020; and Supplemental Transportation Assessment – Added Nearby Related Project, January 2022.*

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

### (1) Federal

#### *(a) Americans with Disabilities Act of 1990*

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

### (2) State

#### *(a) Complete Streets Act*

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

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

#### *(b) Assembly Bill 32 (AB 32) and Senate Bill 375 (SB 375)*

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

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

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

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

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

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

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

#### *(c) California Vehicle Code (CVC)*

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

#### *(d) Senate Bill (SB) 743*

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

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

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

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

### *(e) CEQA Guidelines Section 15064.3*

As discussed above, recent changes to CEQA include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop[2] or a stop along an existing high quality transit corridor[3] should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect

2 *"Major transit stop" is defined in Public Resources Code Section 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.*

3 *"High-quality transit corridors" are defined in Public Resources Code Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.*

professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

## (1) Regional

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

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

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

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

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

## (3) Local

### *(a) City of Los Angeles Mobility Plan 2035*

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[4] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

(1) Safety First;
(2) World Class Infrastructure;
(3) Access for All Angelenos;
(4) Collaboration, Communication, and Informed Choices; and
(5) Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals.

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

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

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

- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
    - Continuous local streets that connect to other streets at both ends, and/or
    - Non-Continuous local streets that lead to a dead-end.

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

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

### *(b) Central City Community Plan*

The Project is located in the Central City Community Plan area. The Community Plan includes the following transportation policies that are applicable to the Project:

- Policy 11-6.1: Preserve and enhance Central City’s primary pedestrian-oriented streets and sidewalks and create a framework for the provision of additional pedestrian friendly streets and sidewalks which complement the unique qualities and character of the communities in Central City.

### *(c) Los Angeles Municipal Code*

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

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

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

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

### *(d) LADOT Transportation Assessment Guidelines*

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on VMT, pursuant to State CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the Transportation Assessment Guidelines (TAG) that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including Mobility Plan 2035. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to

provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[5]

### *(e) LADOT Manual of Policies and Procedures Section 321*

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

### *(f) Vision Zero*

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

### *(g) Interim Guidance for Freeway Safety*

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

### *(h) Citywide Design Guidelines*

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

### *(i) Plan for a Healthy Los Angeles*

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of

[5] *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines. https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf. Accessed May, 20, 2021.*

equity and environmental issues.[6] The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

# b) Existing Conditions

## (1) Existing Roadway System

### *(a) Regional Highway System*

The Project is in the Downtown Los Angeles area, which is serviced by multiple freeways. The Harbor Freeway (I-110) is approximately 2,400 to the west of the Project Site and the Santa Monica Freeway (I-10) is approximately 1,700 feet to the south of the Project Site. The Harbor Freeway is an interstate north-south freeway and the Santa Monica Freeway is an interstate east-west freeway. The Harbor Freeway operates between the City of Pasadena and community of San Pedro. The Santa Monica Freeway operates from the City of Santa Monica to the east coast. These freeways link to numerous other freeways in the vicinity providing extensive regional access. The Harbor Freeway is accessible via Blain Street, LA Live Way, and James M. Wood Boulevard in the Project area. The Santa Monica Freeway is accessible from 18th Street west of Grand Avenue and from 17th Street east of Main Street.

The State of California Department of Transportation (Caltrans) website indicates that the Harbor Freeway carries approximately 268,000 vehicles per day (VPD) with 16,700 vehicles per hour (VPH) at the junction to the Santa Monica Freeway during peak periods. According to the Caltrans website, the Santa Monica Freeway is approximately 4,300 feet south of the Project Site and carries approximately 340,000 VPH with 23,800 VPH at the junction to the Harbor Freeway during the peak periods.

### *(b) Roadway Descriptions*

A brief description of the important roadways in the Project Study Area is provided in the following paragraphs:

12th Street – 12th Street is an east-west operating roadway designated as a Modified Collector east of Flower Street in the Project area in the City of Los Angeles Mobility Plan 2035. 12th Street provides one lane in each direction near Figueroa Street and two eastbound lanes east of Flower Street. Current construction for structures north and south of 12th Street between Figueroa Street and Flower Street has affected roadway volumes on this roadway in this area. 12th Street spans from Pico Boulevard near Figueroa Street to South Hooper Avenue in downtown Los Angeles. Time limited metered parking on-street is permitted on 12th Street in the Project area.

Broadway – Broadway is a north-south operating roadway designated as a Modified Avenue II in the City of Los Angeles Mobility Plan 2035. Broadway provides two northbound and one

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

southbound lanes at 8th Street. Bike lanes are provided on Broadway in the Project area. Time limited metered on-street parking is permitted on Broadway in the Project area.

Figueroa Street – Figueroa Street is a north-south operating roadway designated as a Modified Boulevard II in the Project area in the City of Los Angeles Mobility Plan 2035. Figueroa Street provides two lanes in each direction in the Project area that transitions to northbound travel only north of Olympic Boulevard. A bus lane is provided on Figueroa Street. Time limited metered on-street parking is permitted along portions of Figueroa Street in the Project area.

Flower Street – Flower Street is a one-way south operating roadway designated as a Modified Avenue I in in the Project area in the City of Los Angeles Mobility Plan 2035. Flower street provides two to three southbound lanes near Pico and a landscaped area with the Metro Pico Station for the A Line (Blue) at the intersection. Construction activity is evident in the area. Some time-limited metered on-street parking is permitted along Flower Street in the Project area.

Grand Avenue – Grand Avenue is a one-way southbound roadway designated as a Modified Avenue II in the Project area in the City of Los Angeles Mobility Plan 2035. Grand Avenue provides two to three southbound lanes in the Project area with bike lanes. Time limited metered on-street parking is permitted on Grand Avenue in the Project area.

Hope Street – Hope Street is a north-south operating roadway designated as an Avenue II in the Project area in the City of Los Angeles Mobility Plan 2035. Hope Street provides two lanes in each direction at 12th Street reducing to one lane in each direction south of Pico Boulevard. Along the Project frontage, there is one northbound lane with metered parking on the east side of the street. Three lanes are provided at the Hope Street intersection with Pico Boulevard, with a left, through and right turn lane and metered parking on the west side of the street. Time limited metered on-street parking is permitted on Hope Street in the Project area.

Pico Boulevard – Pico Boulevard is an east-west operating roadway designated as an Avenue I in the Project area in the City of Los Angeles Mobility Plan 2035. Pico Boulevard provides two lanes in each direction in the Project area. Time limited metered on-street parking is permitted on Pico Boulevard in the Project area.

Venice Boulevard – Venice Boulevard is an east-west operating roadway designated as a Modified Avenue II in the Project area in the City of Los Angeles Mobility Plan 2035. Venice Boulevard provides two lanes in each direction in the Project area. Time limited metered on-street parking is permitted on Venice Boulevard in the Project area, reducing the capacity to one lane in each direction during off-peak travel time periods.

### (2) Existing Public Transit System

The City's downtown area offers multiple public transportation opportunities in the Project vicinity. Public transportation in the study area is provided by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT's Dash service (DASH LDD & LDF) and Commuter Express Service (CE), Santa Monica Big Blue Bus (BBB), Orange County Transportation

Authority (OC), Metro Rail, and Metro Rapid. The Pico Metro Station is located along Flower Street north of Pico Boulevard approximately 600 feet walking distance from the Project Site.

Metro Transit local lines provide service along Hope Street in the Project area, including:

- Metro 30/330

Metro Rail lines, Commuter Express, and Orange County Transportation Authority provide service along Flower Street in the Project area, including:

- Metro E Line (Expo)
- Metro A Line (Blue)
- Metro J Line (Silver) and Silver Express
- OC 701 and & 721
- CE 438 and 448

Metro Transit local lines, Big Blue Bus, DASH and Commuter Express, provide service along Grand Avenue in the Project area, including:

- Metro 37, 70, 71, 76, 78, 79, 96, 378, and Rapid 770
- BBB R10
- CE 431 and 437
- LDD

Metro Transit lines, Commuter Express and DASH provide service along Figueroa Street in the Project area, including:

- Metro 81, 442,460
- Metro J Line (Silver) and Silver Express
- CE 438 and 448
- LDF

Metro Transit local lines and Metro Rapid lines provide service along Venice Boulevard in the Project area, including:

- Metro Transit Lines 2, 4, 33, and 302
- Metro Rapid Lines 733 and 770

There is a Route 30/330 bus stop on the south side of Pico Boulevard, south of Hope Street, approximately 100 feet from the Project Site and a bus stop on the north side of Pico Boulevard, east of Grand Avenue, approximately 500 feet from the Site.

There are bus stops at Grand Avenue and Pico Boulevard approximately 500 feet from the Project Site for Routes 37, 70, 71, 76, 78, 79, 96, 378, 7790, BB R10, CE 431, CE 437 & LDD.

The Pico Metro Station is approximately 500 feet from the Project Site. This station provides service for the Metro A Line (Blue), which operates between 7$^{th}$ Street/Metro Center and

downtown Long Beach, as well as service for the E Line (Expo), which operates between the 7th Street/Metro Center and downtown Santa Monica.

Transfer opportunities are available to/from downtown Los Angeles from the Metro, local and regional lines. The transit lines, Metro lines, and associated stops in the Project area are illustrated in Appendix D of the Traffic Assessment, included as **Appendix J.1** to this Draft EIR.

*(a) Ridership Capacity*

There are multiple lines within 1/4 mile of the Project Site. Within 500 feet walking distance, there isa Metro station servicing 2 lines (A Line & E Line), 11 Metro Local lines, 1 BB line, 2 Commuter Express lines and 1 Dash Line. The A and E Line trains provides a train every 12 minutes while in service. There are two to three cars each train. Typically, there are 90 seats and standing room for up to 70 riders. With 160 passengers in each direction every 12 minutes and two lines, there is a capacity for 3,200 passengers in each direction during the peak hours (2 directions X 160 passengers X 2 lines X 60 minutes/12 minutes). Most bus services in the area have a range of 10 to 20 minutes headways (service between buses) in both the AM and PM peak hours. One bus line had 1 hour headways. Therefore, there would be 1 to 6 buses per line in each direction. With 15 bus lines available in the area, an average of 3 buses per line in each direction, there would be 90 buses in a single hour (15 bus lines X 3 buses per line X 2 directions). This would equate to a total of 3,600 seats during the peak hour (90 buses X 40 seats). This does not include standing capacity. Therefore, there conservatively is capacity for 6,800 passengers between the rail and bus lines.

### (3) Existing Parking and Site Access

The existing Project Site contains a surface parking lot in the southeastern portion of the Site accessible from an alley driveway along Pico Boulevard.

### (4) Existing Pedestrian and Bicycle Facilities

The sidewalks along the Project frontages provide connectivity to pedestrian crossings at the intersections of Hope Street/12th Street and Hope Street/Pico Boulevard. These intersections are signalized and provide crosswalk striping and Americans with Disabilities Act wheelchair ramps. Both Hope Street and Pico Boulevard are included in the Pedestrian Enhanced District.

No bike facilities, including bike paths, bike lanes, or bike routes, are currently located along the Project frontage of Hope Street or Pico Boulevard; however, Pico Boulevard is identified as a potential future Tier 3 bike facility.

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project would have a significant impact if it would:

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

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

***Threshold c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); 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 its TAG. The analysis in this section and the Transportation Assessment, included as **Appendix J.1** of this Draft EIR, uses the latest version of the TAG updated by LADOT in 2020.

## (2) Consistency with Transportation Plans

As described above, the CEQA Guidelines Transportation Threshold (a) has been updated to require an analysis of the proposed Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle, and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. In accordance with the TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent.

## (3) CEQA Guidelines Section 15064.3 (VMT Analysis)

### *(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 was updated July 2020. Due to the timing of the report and the changes made to the TAG, the Transportation Assessment includes elements of both iterations. The TAG is included as **Appendix J.1** of this Draft EIR, and the impact analysis herein. 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 APC (Central 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.

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 or residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of the *Technical Advisory on Evaluating Transportation Impacts in CEQA*.[7] Therefore, as detailed in the *City of Los Angeles VMT Calculator Documentation*[8] (VMT Calculator Documentation), the City's households 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.

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-

[7] *California Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.*

[8] *City of Los Angeles, Department of Transportation and Department of City Planning, City of Los Angeles VMT Calculator Documentation, February 2019.*

residential use at a project site), Home-Based Other Attraction (i.e., trips to a non-workplace destination at a project site originating from a residential use), and Non-Home-Based Other Attraction (i.e., trips to a non-residential destination at a project site originating from a non-residential use). These trips are not factored into the household VMT per capita and work VMT per employee thresholds, because these trip types are typically localized and are assumed to have a negligible effect on the VMT impact assessment.

### *(b) VMT Analysis Methodology*

LADOT developed City of Los Angeles VMT Calculator Version 1.3 (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with the TAG.

The land use categories included in the VMT Calculator tool are based on land uses identified in the ITE Trip Generation manual (except where otherwise identified in Section 3.1). Hotel & Motel land uses are specifically included in the VMT calculator. All land uses utilize the average daily vehicle trip generation rates from the ITE Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012) as a starting point. The VMT calculator was validated to LA conditions based on the empirical counts conducted at market rate residential, affordable housing, office, and mixed-use sites in the City, regardless of the source of the rates used as a starting point. Additionally, the VMT calculator considers the number of convenient trip destinations within the immediate area, as nearby retail and jobs in a project area increases the amount of walking to/from the site and reduces traffic generation.

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 a Compact Infill (Zone 3) 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 a project is located to determine the trip length and trip type, which factor into the calculation of a 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 a 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 based on Census data for the City and employment assumptions derived from multiple data sources, including: the 2012 Developer Fee Justification Study; the Institute of Transportation Engineers (ITE) 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*.[9]

### (4) Hazardous 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,

[9] *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, August 2010.*

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.

### (5) Emergency Access

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

### (6) Cumulative Analysis

The cumulative analysis considers both short- and long-term Project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis described above. Cumulative effects are determined through a consistency check with the SCAG RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less-than-significant cumulative impact on VMT. For projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of SCAG's RTP/SCS.

Projects that both demonstrate a project impact by applying an efficiency-based VMT threshold and that are not deemed to be consistent with the SCAG RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether such a project's cumulative impact on VMT is significant. This analysis could be conducted by running the City's TDF Model with the cumulative "no project" scenario representing the adopted RTP/SCS cumulative year conditions (as incorporated into the City's model) and the cumulative "plus project" scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed project. Citywide VMT,

household VMT per capita, or work VMT per employee (depending on project type) would be calculated for both scenarios, and any increase in VMT, household VMT per capita, or work VMT per employee (depending on project type) above that which was forecast in the adopted RTP/SCS would constitute a significant impact because it could jeopardize regional air quality conformity or GHG reduction findings.

## c) Project Design Features

The Project would implement the following project design feature (PDF) to avoid or minimize adverse construction-related impacts. The PDF would be incorporated into the Project and is considered to be part of the Project for purposes of the impact analysis.

**PDF TR-1.** A Construction Staging and Traffic Management Plan shall be developed by the Applicant and approved by the Los Angeles Department of Transportation prior to issuance of building permits. The Construction Staging and Traffic Management Plan will formalize how construction will be carried out and identify specific actions that will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. The Construction Staging and Traffic Management Plan shall facilitate traffic and pedestrian movement and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Staging and Traffic Management Plan shall include, but not be limited to, the following:

- Construction workers will be prohibited from parking on adjacent streets and construction workers will be directed to park on-site or at an off-site location.
- The bulk of the work will be conducted on-site. However, if temporary lane closures are needed, Street Services approval would be required to route vehicular traffic, bicyclists, and pedestrians around any such closures. These closures would be limited to the non-peak commute hours of 9:00 AM to 4:00 PM.
- Deliveries of construction material will be coordinated with non-peak commute hours, to the extent possible.
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

# 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

### *(a) Screening Questions*

As discussed above, the TAG provides a list of screening questions to assist in identifying key policy documents that may be relevant to a project. The screening table and applicable plan consistency analysis is provided in **Table IV.K-1, Questions to Determine Project Applicability to Plans, Policies, and Programs**, below.

**Table IV.K-1**
**Questions to Determine Project Applicability to Plans, Policies, and Programs**

| # | Guiding Questions | Relevant Plans, Policies, and Programs | Response |
|---|---|---|---|
| **EXISTING PLAN APPLICABILITY** | | | |
| 1 | Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone? | LAMC Sec. 12.37 | **No**. The Project Site has frontages along Hope Street, which is an Avenue II roadway, and Pico Boulevard, which is an Avenue I roadway; however, the Project Site is zoned R5. As such, no further analysis is required. |
| 2 | Is the Project Site along any network identified in the City's Mobility Plan? | Mobility Plan Policies 2.3 through 2.7 | **Yes**. Hope Street is designated as part of the Neighborhood Network in the Mobility Plan 2035's Neighborhood Enhanced Network map and as a Tier 3 Bicycle Lane in the Bicycle Lane Network map. Additionally, both Hope Street and Pico Boulevard are designated as Pedestrian Segments in the Pedestrian Enhanced Districts map. As such, an analysis of the Project's consistency with Mobility Plan Policies 2.3 through 2.7 is provided below. |

**Table IV.K-1**
**Questions to Determine Project Applicability to Plans, Policies, and Programs**

| # | Guiding Questions | Relevant Plans, Policies, and Programs | Response |
|---|---|---|---|
| | | **EXISTING PLAN APPLICABILITY** | |
| 3 | Are dedications or improvements needed to serve long-term mobility needs identified in the Mobility Plan 2035? | Mobility Plan – Street Classifications; Street Designations and Standard Roadway Dimensions, and Mobility Plan Policy 2.17: Street Widenings | **Yes**. The Project would be required to provide a 3-foot average easement and a 3-foot dedication along Hope Street. In addition, the Project would be required to provide up to a 14-foot dedication along Pico Boulevard. However, the Project is seeking a waiver of dedication to maintain the existing right-of-way on Pico Boulevard and Hope Street. Dedications are not feasible at the Project Site due to the Existing Hotel at the corner of Hope Street and Pico Boulevard. As such, an analysis of the Project's consistency with Mobility Plan – Street Classifications; Street Designations and Standard Roadway Dimensions, and Mobility Plan Policy 2.17: Street Widenings is provided below. |
| 4 | Does the Project require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program? | N/A | **No**. The nearest bus stop is located on the south side of Pico Boulevard, approximately 100 feet from the Project Site, which is not part of the Project Site. As such, no further analysis is required. |
| 5 | Is the Project Site in an Identified Transit Oriented Community? | Mobility Plan Transit Enhanced Network, Mobility Plan Pedestrian Enhanced Districts, and Transit Oriented Communities (TOC) Guidelines | **Yes**. The Project Site is located within a Tier 4 Transit Oriented Community. As such, an analysis of the Project's consistency with the Mobility Plan's TEN, PED, and TOC Guidelines is provided below. |
| 6 | Is the Project Site on a roadway identified in the City's High Injury Network? | Vision Zero Action Plan | **No**. Neither Pico Boulevard nor Hope Street in the vicinity of the Project Site are identified in the City's High Injury Network in the City's Vision Zero Action Plan. As such, no further analysis is required. |
| 7 | Does the Project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.) | Mobility Plan Policy 2.1: Adaptive Reuse of Streets; Mobility Plan Policy 2.10: Loading Areas; Mobility Plan Policy 3.5 Multi-Modal Features; Mobility Plan Policy 3.8 Bicycle Parking; Mobility Plan Policy 4.13 Parking and Land Use Management; and Mobility Plan Policy 5.4 Clean Fuels and Vehicles | **No**. The Project does not propose repurposing existing curb space. As such, no further analysis is required. |

**Table IV.K-1**
**Questions to Determine Project Applicability to Plans, Policies, and Programs**

| # | Guiding Questions | Relevant Plans, Policies, and Programs | Response |
|---|---|---|---|
| **EXISTING PLAN APPLICABILITY** | | | |
| 8 | Does the Project propose narrowing or shifting existing sidewalk placement? | Mobility Plan Policy 2.3: Pedestrian Infrastructure; 3.1: Access for All; Pedestrian Enhanced Districts, Mobility Plan Program ENG 19: Mobility Plan Policy 2.17: Street Widenings | **No**. The Project would not narrow or shift existing sidewalks. As such, no further analysis is required. |
| 9 | Does the Project propose paving, narrowing, shifting or removing an existing parkway? | Mobility Plan Policy 5.5: Green Streets, Sustainability pLAn | **No**. The Project would not modify an existing parkway. As such, no further analysis is required. |
| 10 | Does the Project propose modifying, removing, or otherwise affect existing bicycle infrastructure (ex: driveway proposed along street with bicycle facility) | Mobility Plan – Bicycle Enhanced Network Policy 4.15, public hearing process | **Yes**. The Project would provide an access way off of Hope Street, which is designated as a Tier 3 Bicycle Lane in the Mobility Plan's Bicycle Lane Network map. As such, an analysis of the Project's consistency with Mobility Plan – Bicycle Enhanced Network Policy 4.15 is provided below. |
| 11 | Is the Project Site adjacent to an alley? If yes, will the Project make use of, modify, or restrict alley access? | Mobility Plan Policy 3.9: Increased Network Access; Mobility Plan Programs ENG.9, PL.1, PL.13, and PS.3 | **Yes**. The Project Site is located adjacent to an existing alley. There is a Project driveway/accessway proposed on Hope Street that extends to the alley. Vehicles would access the Project via the driveway to the entry of the garage or from the alley to the entry of the garage. The alley access would remain and would not be restricted or modified. |
| 12 | Does the Project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, is the cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)? | Mobility Plan Policy 3.10 Cul-de-sacs | **No**. The Project would not create a cul-de-sac and would not be adjacent to an existing cul-de-sac. As such, no further analysis is required. |
| 13 | Does the Project Site introduce a new driveway or loading access along an arterial (Avenue or Boulevard)? | Mobility Plan Programs PL.1; PK.10; Citywide Design Guideline Policy 4.1.02 | **Yes**. The Project would introduce a new driveway off of Hope Street, an Avenue II roadway. As such, an analysis of the Project's consistency with Mobility Plan Programs PL.1; PK.10, and Citywide Design Guidelines Policy 4.1.02 is provided below. |

**Table IV.K-1**
**Questions to Determine Project Applicability to Plans, Policies, and Programs**

| # | Guiding Questions | Relevant Plans, Policies, and Programs | Response |
|---|---|---|---|
| | | **EXISTING PLAN APPLICABILITY** | |
| 14 | If yes to 13, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs? | Mobility Plan Program PL.1; Manual of Policies and Procedures Section 321: Driveway Design | The alley would also be used |
| 15 | Does the Project Site include a corner lot? (avoid driveways too close to intersections) | Citywide Design Guidelines Policy 4.1.01 | **Yes**. The Project Site is located on the northeast corner of the intersection of Pico Boulevard and Hope Street. As such, an analysis of the Project's consistency with Citywide Design Guidelines Policy 4.1.01 is provided below. |
| 16 | Does the Project propose driveway width in excess of City standard? | Manual of Policies and Procedures Section 321: Driveway Design | **No**. The Project's proposed driveway would conform to the City's width standards. As such, no further analysis is required. |
| 17 | Does the Project propose more driveways than required by City maximum standard? | Manual of Policies and Procedures – Section 321: Driveway Design | **No**. The Project would only include one driveway off of Hope Street. As such, no further analysis is required. |
| 18 | Are loading zones proposed as part of the Project? | Mobility Plan Policy 2.10 Loading Areas; Mobility Plan Programs PK.1; PK.7; PK.8; and Manual of Policies and Procedures - Section 321: Driveway Design | **Yes**. The Project would include a loading dock accessed from the alley. As such, an analysis of the Project's consistency with Mobility Plan 2.10 Loading Areas; Mobility Plan Programs PK.1; PK.7; PK.8; and Manual of Policies and Procedures - Section 321: Driveway Design is included below. |
| 19 | Does the Project include "drop-off" zones or areas? If yes, are such areas located to the side or rear of the building? | Mobility Plan Policy 2.10 Loading Area | **Yes**. The Project would include a loading dock accessed from the alley. As such, an analysis of the Project's consistency with Mobility Plan Policy 2.10 Loading Area is included below. |
| 20 | Does the Project propose modifying, limiting/restricting, or removing public access to a public right-of-way (e.g., vacating public right-of-way)? | Mobility Plan Policy 2.3: Pedestrian Infrastructure; Mobility Plan Policy 3.9: Increased Network Access | **No**. The Project would not modify, limit, or remove public access to a public right-of-way. As such, no further analysis is required. |

Based on the screening questions above, the following plans, policies, and programs apply to the Project:

- Mobility Plan 2035
  - Policies 2.3 through 2.7, 2.10, 2.17 3.9, and 4.15;
  - Programs ENG.9, PK.1, PK.7, PK.8, PK.10, PL.1, PL.13, and PS.3;

- Street Classifications; Street Designations and Standard Roadway Dimensions;
- Transit Enhanced Network;
- Pedestrian Enhanced Districts;

- Transit Oriented Communities (TOC) Guidelines;
- Citywide Design Guideline Policy 4.1.01 and 4.1.02; and
- Manual of Policies and Procedures - Section 321: Driveway Design.

*(b) Mobility Plan 2035*

As discussed in the regulatory setting above, the Transportation Element of the City's General Plan, the "Mobility Plan 2035," offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. In general, the Proposed Project would not impede or impair the City's ability to implement the five broad goals of the Mobility Plan 2035 relating to: (1) public safety, (2) infrastructure networks, (3) providing accessibility for all Angelenos, (4) ensuring departmental and agency cooperation, and (5) providing for a clean environment. Based on the initial screening responses in **Table IV.K-1**, above, a discussion of the Proposed Project's consistency with the applicable Mobility Plan Policies and Programs is provided below.

*(i) Policies 2.3 through 2.7, 2.10, 2.17, 3.9, and 4.15*

***Policy 2.3 Pedestrian Infrastructure - Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment:*** The Project would provide onsite pedestrian open space with seating and landscaping throughout the center of the Site and with a ground-level entry courtyard that would access spaces of the Existing Hotel and Hotel Expansion. The Project includes a request for a waiver of the dedication requirement on Hope Street and Pico Boulevard to maintain the existing sidewalk and street wall. Therefore, the Project would not redesign the street or sidewalk in a way that would limit any future demands. The Project would not conflict with Policy 2.3.

***Policy 2.4 Neighborhood Enhanced Network (NEN)—Provide a slow speed network of locally serving streets:*** The NEN is comprised of local streets intended to benefit from pedestrian and bicycle related safety enhancements for more localized slower means of travel while preserving the connectivity of local streets to other enhanced networks. These enhancements encourage lower vehicle speeds providing added safety for pedestrians and bicyclists. Hope Street north of Pico Boulevard, in the Project area, has been identified in the NEN. Pico Boulevard east of Hope Street to Stanford Avenue, in the Project area, has also been identified in the NEN. The Project would provide landscaped sidewalks along both Hope Street and Pico Boulevard that connect to on-site pedestrian serving retail and restaurant. The Project would not conflict with Policy 2.4.

***Policy 2.5 Transit Enhanced Network (TEN)—Improve the performance and reliability of existing and future bus service:*** - The TEN is comprised of streets that prioritize travel for transit riders. Figueroa Street, west of the site, is designated as a Comprehensive Transit Enhanced street. Venice Boulevard, south of the site, is designated as a Comprehensive Transit Enhanced street. The Project would support implementation and would not preclude the future transit enhancements and not conflict with Policy 2.5.

***Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities:*** While this is a citywide policy, the Project would support its implementation. Project development would not preclude development of bike lanes along Hope Street or Pico Boulevard, and the Project would not conflict with the bicycle lane network in the Mobility Plan 2035.

***Policy 2.7 Vehicle Network—Provide vehicular access to the regional freeway system:*** This is a citywide policy that does not apply to this Project. Development would not alter the roadway system along Hope Street or Pico Boulevard. Primary regional access would be provided the Santa Monica (I-10) Freeway and Harbor Freeway (I-110). These facilities are 1,700 feet south and 2,400 feet west of the Project respectively. The Project conflict with Policy 2.7.

***Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas:*** The Project would include a loading dock for deliveries accessed from the alleyway on the eastern edge of the Site. Additionally, the Project would include three drop off and loading areas for guest and residents, one accessible from Hope Street, one on the driveway at the northern edge of the Site, and one from the alleyway on the eastern edge of the Site. The northern and eastern drop off and loading areas would be interior to the Site, minimizing conflicts with vehicles and pedestrians. The Hope Street drop off and loading area would be located on either side of the entry courtyard and safely away from the Hope Street and Pico Boulevard intersection. The Project would comply with Policy 2.10.

***Policy 2.17 Street Widenings—Carefully consider the overall implications (cost, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension:*** The Downtown Street Standards require a 56-foot roadway with 15-foot sidewalks (with an additional 3 feet average easement for the sidewalks) along Hope Street for a total 86-foot right-of-way. The Downtown Street Standards require a 70-foot roadway with 15-foot sidewalks and 3-foot average easements for a total 100-foot right-of-way. The Project Site frontage along Pico Boulevard is currently dedicated with 76-foot right-of-way transitioning to 72 feet easterly. No dedication is feasible on along Pico Boulevard or Hope Street due to the Existing Hotel. As part of the Vesting Tentative Tract Map request, the Applicant is seeking a waiver of the dedication requirement for Pico Boulevard and Hope Street to permit the continued maintenance of the 12-foot wide sidewalk and existing street wall on said streets in lieu of the required dedications to the public right- of-way. A 3-foot average easement would be provided along the east and north endsof the Site with landscaped sidewalks connecting to on-site where there is currently a parking lot. No widening would occur on either roadway. The Project would comply with Policy 2.17.

***Policy 3.9 Increased Network Access—Discourage the vacation of public rights-of-way:*** The Project would not include any vacation of public rights-of-way. The Project includes a waiver of the dedication request for Pico Boulevard and Hope Street to permit the continued maintenance of the 12-foot wide sidewalk and existing street wall on said streets in lieu of the required dedications to the public right- of-way. Therefore, the Project would not redesign the street or sidewalk in a way that would limit any future demands.

*(ii) Programs ENG.9, PK.1, PK.7, PK.8, PK.10, PL.1, PL.13, and PS.3*

***ENG.9 Green Alleys Program. Continue the Green Alleys program to introduce low-impact development stormwater features and improve the overall quality and safety of neighborhood alleys:*** Although this Project has an alley along the eastern boundary of the Site, no changes to the alley are proposed at this time. The Project BMPs will control stormwater runoff with no increase in runoff resulting from the Project based on post construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program. The Project would not impact existing storm drain infrastructure serving the Project Site and runoff would continue to follow the same discharge paths and drain to the same stormwater systems.

***PK.1 Creative Parking Solutions. Work with communities, businesses, and organizations to identify and implement creative strategies to resolve parking conflicts in areas with high-parking demand:*** The Project Site is in a Transit Priority Area and Enterprise Zone because it is located near transit. Given this proximity, the Project Site is proposed to have no parking minimums in the updated Downtown Community Plan. Additionally, Downtown Community Plan LU Goal 11.8 promotes compact development to encourage walking, biking, and transit use by encouraging no or minimal parking, when possible. Therefore, this program is not applicable.

***PK.7 Off-Street Loading. In non-industrial areas, require off-street dock and/or loading facilities for all new non-residential buildings and for existing non- residential buildings and undergoing extensive renovations and/or expansion, whenever practical:*** The Project would provide off-street loading facilities from the north-south alley that runs along the eastern boundary of the Site. This existing alley would be used to access these facilities.

***PK.8 On-Street Loading. Encourage the designation of on-street loading areas, through removal of curb parking, in established industrial areas where off-street loading facilities are lacking. Update the Commercial Loading Zone Ordinance (see B-2, page 6, 2-14 of Mayor's Task Force-Mar 2004):*** Not applicable.

***PK.10 Pedestrian Improvement Incentives. Establish an incentive program to encourage projects to retrofit parking lots, structures and driveways to include pedestrian design features:*** This a citywide program and the Project would not conflict with the implementation. The new driveway along the northern boundary of the site would be partially covered and comply with City guidelines The Project would not conflict with PK.10.

***PL.1 Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement:*** The Project would provide one driveway off of Hope Street north of Pico Boulevard. This partially covered driveway would connect to Hope Street and the north-south driveway on the east boundary of the site to the garage opening off the driveway. The Project would include vehicle warning system, mirrors, or other such pedestrian safety technology, as required. All other vehicular access would be from the alley. The Project would not conflict with PL.1

***PL.13 Special Street/Alley Treatments. Explore the use of special materials used within public right of ways:*** The north-south alley along the eastern boundary of the Site would be evaluated for any features in need of repair. No special treatments are being considered at this time.

### *(iii) Street Classifications; Street Designations and Standard Roadway Dimensions*

Hope Street is an Avenue II and requires an 86-foot right-of-way and 56-foot roadway. The Project Site frontage along Hope Street is currently 80-feet of right-of-way. The Project would be required to dedicate 3 feet according to the Mobility Plan 2035 and provide a 3-foot average easement for a 15-foot sidewalk. Per the Downtown Street Standards, a 56-foot roadway with 15-foot sidewalks (with an additional 3 feet average easement for the sidewalks) is required along Hope Street. As part of the Vesting Tentative Tract Map request, the Applicant is seeking a waiver of the dedication requirement for Pico Boulevard and Hope Street to permit the continued maintenance of the 12-foot wide sidewalk and existing street wall on said streets in lieu of the required dedications to the public right- of-way. The Project would provide a 3-foot average easement along Hope Street and Pico Boulevard. The Project would provide on-site pedestrian open space with seating and landscaping throughout the center of the Site, with a pedestrian walkway between the Existing Hotel/Hotel Expansion and the Hotel/Residential Tower.

Pico Boulevard is an Avenue I and the Downtown Street Standards require a 100-foot right-of-way with 3-foot average easements for a 70-foot roadway with 15-foot sidewalks. The Project Site frontage along Pico Boulevard is currently dedicated with 76-foot right-of-way transitioning to 72 feet easterly. No dedication is feasible on the west of the Site along Pico Boulevard due to the retention of the existing building. A 3-foot easement would be provided along the east end of the Site where there is currently a parking lot.

### *(iv) Transit Enhanced Network*

The TEN is comprised of streets that prioritize travel for transit riders. Figueroa Street, west of the Site, and Venice Boulevard, south of the Site, are designated as Comprehensive Transit Enhanced streets.

### *(v) Pedestrian Enhanced Districts*

Several streets within the study area have been identified in the pedestrian enhanced district maps with the goal of providing a more attractive environment to promote walking for shorter trips. Adding

pedestrian design features and street trees encourages people to take trips on foot instead of by car. This helps to reduce the volume of cars on the road and emissions, increase economic vitality, and make the City feel like a more vibrant place.

Many streets in the downtown area are identified in the Pedestrian Enhanced District including along both Hope Street and Pico Boulevard Project frontages.

*(c) Transit Oriented Communities (TOC) Guidelines*

These Guidelines are intended to provide eligibility standards, incentives, and other necessary components for TOC Affordable Housing Incentive Areas. The Project does not include or propose affordable housing; therefore, these Guidelines are not applicable.

*(d) Citywide Design Guideline 2 (Carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience)*

The Project would prioritize the pedestrian access and experience first with a welcoming center courtyard as the entry to the Project Site. A partially covered driveway along the north end of the Site would be provided, which would connect Hope Street and the north-south alley along the north side of the street to the subterranean parking levels opening thereby minimizing pedestrian contact. Valet zones would be provided along the curb area of Hope Street (for hotel/commercial guests), the partially covered driveway (for residents) and alley (for hotel/commercial patrons) to accommodate walking throughout the site.

*(e) Manual of Policies and Procedures - Section 321: Driveway Design*

The new driveway along the north end of the Site would provide a vehicular access as far from the intersection of Hope Street and Pico Boulevard as physically possible. Driveway design and widths would comply with the City Driveway Design guidelines.

*(f) Other Programs, Plans, Ordinances, and Policies*

As found in the Evaluation of City Documents that Establish the Regulatory Framework and Questions to Determine Project Applicability to Plans, Policies and Programs summaries provided in Appendix F of the Traffic Assessment, the construction and operation of the Project is in general conformance and consistent with standards adopted in the City's transportation plans and policies for all travel modes. The Project would not preclude the City's implementation of any adopted policy and/or program except where existing buildings preclude additional public right-of-way dedications, easements or improvements and a reduction in dedication requirement is requested along Pico Boulevard. Additional pedestrian activating space would be provided on-site.

The Project roadways identified in the Complete Streets Mobility Networks are identified in the Traffic Assessment. No vacation of public right-of-way is proposed for the Project. However, relief from street dedication is sought for both Hope Street and Pico Boulevard.

Hope Street is an Avenue II and requires an 86-foot right-of-way and 56-foot roadway and 15-foot sidewalk. The Project Site frontage along Hope Street is currently 80-feet of right-of-way. The Project would be required to dedicate 3 feet according to the Mobility Plan 2035 for a 15-foot sidewalk according to the Downtown Street Standards. The Downtown Street Standards require a 56-foot roadway with 15-foot sidewalks (with 3 feet average easement for the sidewalks) along Hope Street. The Project is requesting a waiver of dedication to retain the existing dedication and 12-foot sidewalks and would provide a 3-foot average easement along Hope Street. The Project would provide on-site pedestrian open activating space with seating and landscaping throughout the center of the Site and with a pedestrian walkway between the Rehabilitated Hotel/Hotel Expansion and the Hotel/Residential Tower.

Pico Boulevard is an Avenue I and requires a 100-foot right-of-way and 70-foot roadway. The Project Site frontage along Pico Boulevard is currently dedicated with 76-foot right-of-way transitioning to 72 feet easterly. The Downtown Street Standards require a 100-foot right-of-way with for a 70-foot roadway with 15-foot sidewalks and 3-foot average easements. No dedication is feasible on the west of the Site along Pico Boulevard due to the retention of the existing building. The Project is requesting a waiver of dedication to retain the existing dedication and 12-foot sidewalks and 3-foot average easement along the east end of the Site where there is currently a parking lot. However, as mentioned above, the Project would provide on-site pedestrian open activating space with seating and landscaping throughout the center of the Site and with a pedestrian walkway between the Rehabilitated Hotel/Hotel Expansion and the Hotel/Residential Tower.

The Project is requesting relief from the dedications that would need to be approved and signed-off by the City. The relief is requested due to the existing building on the corner that would be renovated and not removed, precluding widening. As stated, the Project would provide on-site pedestrian walkways and open space in keeping with the Downtown Street Standards goals.

One driveway on Pico Boulevard and one driveway on Hope Street would be closed. A partially covered driveway off Hope Street would be created along the northern boundary of the Project. Long-term, or cumulative, effects are determined though a consistency check with the SCAG RTP/SCS. The RTP is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) goals. The LADOT VMT analysis calculator has been developed based on the SCAG RTP/SCS principals and take into consideration cumulative effects. LADOT has indicated that projects, such as this Project, that are found to be consistent, would have a less than significant cumulative impact on VMT. No cumulative VMT Project impacts have been identified.

Any damaged or off-grade sidewalk, curb and gutter along the property frontage would be repaired under Section 12.37 of the LAMC. In addition, the pedestrian environment would be enhanced by the Project by providing wider sidewalks and new street activation space along the Hotel/Residential Tower Hope Street frontage, and new pedestrian access way between the Rehabilitated Hotel/Hotel Expansion and the Hotel Residential Tower.

The Project would not preclude the City's implementation of any adopted policy and/or program. The analysis found that the Project conforms with and is consistent with standards adopted City's transportation plans and policies for all travel modes.

**Based on the analysis presented above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. No mitigation measures are required.**

### (2) Mitigation Measures

The proposed Project's impacts upon plans, policies and programs would be less than significant, and no mitigation measures are required.

### (3) Level of Significance After Mitigation

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.

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

### (1) Impact Analysis

The Project was evaluated against the initial screening criteria to determine if a full VMT analysis was required. Using the VMT calculator for screening purposes, the Project would generate 4,240 vehicle trips without any TDM strategies and a net increase in daily VMT of 26,132. Based on the responses to the Screening Criteria, the Project required a full VMT analysis. Appendix F of the Traffic Assessment (**DEIR Appendix J.1**) contains the VMT reports.

LADOT has identified thresholds for significant VMT impacts for each of the 7 Area Planning Commission (APC) sub-areas. The Project is in the Central APC area which limits daily household VMT per capita to a threshold of 6.0 and a daily work VMT per employee threshold of 7.6 (15% below the existing VMT for the Central APC). Projects containing small scale (less than 50,000 square feet) local serving retail/restaurant uses are assumed to have less than significant VMT impacts. For the purposes of the Transportation Assessment, the Project contains 33,981 square feet of restaurant and museum space but also includes 136 residential units, and 444 hotel rooms with associated amenities. Therefore, the Project's residential daily household VMT per capita and work VMT per employee is compared against the threshold criteria for the Central APC.

Results of the Project's VMT calculation show a daily Household VMT per capita value of 3.5 (below the Central APC area threshold value of 6.0), and Work VMT of 6.7 (below the Central APC area threshold value of 7.6). Per the City's TAG, this VMT calculation takes into account the number of convenient trip destinations within the immediate area as nearby attractions (restaurants, Crypto.com Arena [formerly Staples Center], museums) retail uses, and jobs in the project area and therefore accounts for VMT generated by hotel guests.

**Based on the above VMT analysis, 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, and no mitigation measures are required.

### (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 remains less than significant.

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

### (1) Impact Analysis

As discussed in **Section V, Other CEQA Considerations**, and in the Initial Study (**Appendix A**), the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Although the Project has been redesigned following publication of the Initial Study, no new geometric design hazards, such as sharp curves, dangerous intersections, or incompatible uses were added to the Project. **Therefore, the Project would have no impact with respect to Threshold c), and no mitigation measures are necessary.**

### (2) Mitigation Measures

The proposed Project would have no impact and therefore, no mitigation measures are required or included.

### (3) Level of Significance After Mitigation

The Project would have no impact prior to mitigation. Therefore, no mitigation measures were required or included and there remains no impact.

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

### (1) Impact Analysis

#### *(a) Construction*

Construction activities have the potential to affect emergency access, by adding construction traffic to the street network and requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services.
- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete.
- The Project would prepare a Construction Staging and Traffic Management Plan (see PDF TR-1) that would address traffic and access control during construction.

Accordingly, Project construction would not affect emergency access. **Therefore, Project construction-related impacts to emergency access would be less than significant.**

*(b) Operation*

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site, including Hope Street and Pico Boulevard. All circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Project Site would be maintained at all times.

This increase in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Project's proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. **Therefore, Project impacts related to emergency access would be less than significant.**

## (2) Mitigation Measures

Project impacts to emergency access would be less than significant without mitigation. Therefore, no mitigation measures were required or included.

## (3) Level of Significance After Mitigation

Project impacts to emergency services would be less than significant without mitigation. Therefore, no mitigation measures were required or included and the impact level remains less than significant.

See also **Section IV.E, Hazards and Hazardous Materials**, of this Draft EIR.

# e) Cumulative Impacts

## (1) Impact Analysis

### *(a) Consistency with Transportation Plans*

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 **Figure III-5** in **Section III, Environmental Setting**, of this Draft EIR, 33 of the 172 related projects (e.g., Related Projects Nos. 3, 8, 11, 15, 18, 20, 36, 40-41, 43, 59, 66, 68, 70, 74, 76-79, 82, 111, 119, 122, 124, 129, 144, 150, 157, 164, 165, 170, 171, and 172) are located within a 0.25-mile radius (e.g., the area approximately bounded by Olympic Boulevard to the north, Broadway to the east, Venice Boulevard to the south, and Figueroa Street to the west) 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 many of the 33 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 impacts with regard to transportation plan consistency would not be cumulatively considerable, and the cumulative impact with regard to transportation plan consistency 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 air quality and GHG reduction goals of the SCAG 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 impact with regard to VMT. Furthermore, as evaluated in **Section IV.A, Air Quality**, of this Draft EIR, the Project would be consistent with the RTP/SCS. **As such, the Project's impacts with regard to VMT would not be cumulatively**

**considerable, and the cumulative impacts with regard to VMT 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. Vehicular access to the Project Site is proposed from Hope Street and, as indicated in **Figure III-5** in **Section III, Environmental Setting**, of this Draft EIR, Related Project No. 59 (1219 S. Hope Street) is located across Hope Street from the Project Site and Related Project No. 172 (1201 S. Grand Avenue) is located across a mid-block alleyway from the Project Site. The Project does not propose any roadway infrastructure improvements that would result in sharp curves or dangerous intersections. No incompatible uses or operations are proposed that would cause or result in incompatible equipment being used on site or on local roadways. The roadways in the surrounding area are part of the existing urban roadway network and do not contain sharp curves or dangerous intersections. Furthermore, the design and implementation of new driveways, including the Project's and those of Related Projects would comply with the City's applicable requirements and would be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. 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 access points along Hope Street or the adjacent alleyway. Therefore, like the Project as evaluated under Threshold (c) above, Related Projects, including Related Project No. 59 and Related Project No. 172, would have less than significant impacts relative to hazardous design features and incompatible uses. **As such, the Project's impacts related to hazardous design features would not be cumulatively considerable, and cumulative impacts relates to hazardous design features would be less than significant.**

### *(d) 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 impacts to emergency access would not be cumulatively considerable, and the cumulative impact to emergency access would be less than significant.**

### (2) Mitigation Measures

Cumulative impacts would be less than significant without mitigation. Therefore, no mitigation measures are required or included.

### (3) Level of Significance After Mitigation

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