

IV. Environmental Impact Analysis

G. Transportation

1. Introduction

This section of the Draft EIR analyzes the Project's potential transportation impacts. This section is based on the *8th, Grand and Hope Project Transportation Assessment* (Transportation Assessment) prepared by The Mobility Group, dated May 2020, revised December 2020, and included in Appendix G of this Draft EIR. The Transportation Assessment follows the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) dated July 2019, 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 vehicle miles traveled (VMT) rather than level of service (LOS).

The base assumptions and technical methodologies (e.g., trip generation, study locations, analysis methodology, etc.) were identified as part of the Transportation Assessment approach and were outlined in a Memorandum of Understanding (MOU) dated December 4, 2019, which was reviewed and approved by LADOT. A copy of the MOU is included in Appendix G of this Draft EIR. LADOT also reviewed and approved the Transportation Assessment and Supplemental Analysis Memorandum prior to circulation of this Draft EIR. A copy of LADOT's Assessment Letters for the Transportation Assessment dated January 22, 2021, and Supplemental Analysis Memorandum, dated June 16, 2021, are included in Appendix G of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Senate Bill 743

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

changes include elimination of automobile delay, 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. The City of Los Angeles (City) adopted the updated guidelines on May 2, 2019.

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

SB 743 also adds Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”¹ A “transit priority area” is defined as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program

¹ PRC Section 21099(d)(1).

adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”² PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”³ PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.⁴ PRC Section 21099 applies to the Project because, consistent with 21099(d)(1), the Project is a mixed-use residential project that would be located on an infill site within a transit priority area.

(2) CEQA Guidelines Section 15064.3

As discussed above, recent changes to CEQA include the adoption of Section 15064.3, Determining the Significance of Transportation Impacts. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. 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 professional judgment based on substantial evidence. As discussed further below, LADOT developed the City of Los Angeles VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

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

The Southern California Association of Governments (SCAG) is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans

² PRC Section 21099(a)(7).

³ PRC Section 21064.3.

⁴ PRC Section 21099(a)(4).

that address transportation, growth management, hazardous waste management, and air quality.

In compliance with SB 375, on September 3, 2020, the 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 California Air Resource 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 4 percent of SCAG’s total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 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. The Project Site is located within an HQTA as designated by the 2020–2045 RTP/SCS.^{5,6} TPAs are PGAs that are within 0.5 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.

Refer to Section IV.D, Land Use, of this Draft EIR for a detailed discussion of the relevant provisions of the 2020–2045 RTP/SCS that apply to the Project.

⁵ SCAG, *Connect SoCal, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, High Quality Transit Areas (2045), Exhibit 3.8.*

⁶ Metro, *“High Quality Transit Areas—Southwest Quadrant map.*

(4) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which is an update to the prior Transportation Element. The City Council has adopted several amendments to the Mobility Plan since its adoption, including the most recent amendment on September 7, 2016.⁷ 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. Refer to the analysis below and in Section IV.D, Land Use, of this Draft EIR, for a discussion of the Project’s consistency with the Mobility Plan.

Street classifications/standards are designated in the Mobility Plan to provide a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access. Roadways are now defined in the Mobility Plan and based on the City of Los Angeles Complete Streets Guide as follows:

- Freeways—High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- Arterial Streets—Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
 - Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:
 - Boulevard I provides up to four travel lanes in each direction with a target operating speed of 40 mph.
 - Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph.
 - Avenues pass through both residential and commercial areas and include three categories:

⁷ 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.

- Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
- Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
- Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.
- Collector Streets—Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.
- Local Streets—Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local Streets can be:
 - Continuous local streets that connect to other streets at both ends
 - Non-Continuous local streets that lead to a dead-end.

The Mobility Plan also includes the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network. The Transit Enhanced Network is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within one mile of the network by 2035. The Mobility Plan proposes to design and implement by 2035 Pedestrian Enhanced Districts within the City’s diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and the highest concentration of pedestrian fatalities and severe injuries. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

(5) Los Angeles General Plan Health and Wellness Element—Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles is the Health and Wellness Element of the General Plan. Adopted in March 2015, the Plan for a Healthy Los Angeles provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City’s future growth and development. The Plan for a Healthy Los Angeles accomplishes two policy objectives: (1) elevates existing health-oriented policies in the General Plan; and, where policy gaps exist, (2) creates new policies

to reinforce the City's goal of creating healthy, vibrant communities. While the Plan for a Healthy Los Angeles identifies seven primary goals and provides new policies and programs that serve as the implementation blueprint for creating healthier neighborhoods, the goals that consider transportation include the following:

- A City Built for Health: Use design, construction, and public services to promote the physical, mental, and social well-being of its residents and make it easier for people to shop, buy fresh produce, visit a doctor, have meaningful social interactions, breathe cleaner air, and live and age in their community, across income levels and physical abilities; and
- An Environment Where Life Thrives: Provide a healthy environment, where residents are less susceptible to health concerns related to poor air quality and increased exposure to environmental hazards and toxins.

The Plan for a Healthy Los Angeles envisions a healthy Los Angeles to be one that includes a balanced, multi-modal, and sustainable transportation system that offers safe and efficient options for all users.

(6) Central City Community Plan

The Project Site is located within the Central City Community Plan Area. Last updated in 2003, the Central City Community Plan (Community Plan) is one of 35 community and district plans established for different areas of the City to implement the policies of the Framework Element. The Community Plan identifies and provides for economic opportunities and for the maintenance of significant environmental resources within the community. It also seeks to enhance the distinctive community identity and recognize and promote the unique character of neighborhoods within the Community Plan Area. With respect to transportation and circulation, the Central City Community Plan sets forth the following objectives:

- Objective 11-4: To take advantage of the district's easy access to two mass transit rail lines, the freeway system, and major boulevards that connect Downtown to the region.
- Objective 11-6: To accommodate pedestrian open space and usage in Central City.
 - 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.

- Objective 11-8: To evaluate, study and monitor current parking policies to assess parking demand as a result of changes in development trends, the growing downtown residential community and the general intensification of land use in the Central City area as surface parking lots become developed with other uses.

The City's Department of City Planning is currently updating the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles, in a combined planning process referred to as the DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth.⁸ Specifically, the following core principles represent the long-term priorities for the DTLA 2040 Plan:

- Accommodate anticipated growth through 2040 in an inclusive, equitable, sustainable, and healthy manner while supporting and sustaining Downtown's ongoing revitalization
- Reinforce Downtown's jobs orientation
- Grow and support the residential base
- Strengthen neighborhood character
- Promote a transit, bicycle, and pedestrian friendly environment
- Create linkages between districts
- Create a World-Class Streets and Public Realm

According to the DTLA 2040 Plan Draft, the Project Site would be located within the Transit Core, which would allow a base floor area ratio (FAR) of 9:1 and a bonus FAR of up to 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses. The DTLA 2040 Plan Draft describes the Transit Core area as follows:⁹

Transit Core areas are dense centers of activity built around regional transit hubs that connect pedestrians, cyclists, and transit users to a variety of

⁸ City of Los Angeles, *Downtown Los Angeles Community Plan Update, DTLA 2040*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about>, accessed December 11, 2020.

⁹ Los Angeles Department of City Planning, *Downtown Community Plan Update, Fall 2020 Draft*.

attractions. The building form ranges from Moderate Scale to High Rise, with ground floor treatments that contribute to an enhanced and walkable streetscape. A diverse mix of office, residential, retail, cultural, and entertainment uses makes these places centers of activity around the clock. The residential density of the Transit Core is limited by floor area.

The DTLA 2040 Plan process began in 2014, and a public scoping meeting was held in February 2017 to collect comments from agencies and the public. In 2019 and 2020, City Planning released the draft policy documents as well as proposed land use and zoning updates. The DTLA 2040 Plan Draft Environmental Impact Report was published in 2020 and was followed by a public comment period. Subsequently, a virtual public hearing was held on December 8, 2020.¹⁰

(7) Los Angeles Municipal Code (LAMC)

(a) LAMC Section 12.21-A, 16 (Bicycle Parking)

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.

(b) LAMC Section 12.26-J (TDM Ordinance)

LAMC Section 12.26-J (Ordinance 168,700) pertains to Traffic Demand Management (TDM) and Trip Reduction Measures and refers to the alteration of travel behavior through programs of incentives, services, and policies. This includes the use of alternatives to single-occupant vehicles such as public transit, cycling, walking, carpooling/vanpooling, and changes in work schedule resulting in reduction or elimination (in the case of telecommuting or compressed work weeks) of peak-period trips. LAMC Section 12.26-J applies only to the construction of new non-residential gross floor area, and to developments in excess of 25,000 square feet of commercial area. It sets forth requirements for various types of trip reduction measures for developments in excess of 25,000 square feet, 50,000 square feet, and 100,000 square feet.

¹⁰ Los Angeles Department of City Planning, *Downtown Community Plan Update, Events*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#events>, accessed December 15, 2020.

(c) *LAMC Section 12.37 (Highway and Collector Street Dedication and Improvement)*

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.

(d) *LAMC Section 41.40*

With regard to construction traffic, 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.

(8) 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. LADOT has identified 8th Street, adjacent to the southern boundary of the Project Site, as a High Injury Network (between Figueroa Street and San Pedro Street). In addition, the following nearby streets within the vicinity of the Project Site have been identified: 7th Street (between Vermont Avenue and Mateo Street); 9th Street (between Figueroa Street and Gladys Avenue); Figueroa Street (between 1st Street and Imperial Highway); Spring Street (between 1st Street and 9th Street).¹¹

In order to realize the goals and objectives of the Vision Zero Program, LADOT has initiated a number of projects throughout the City along various street corridors. These projects generally involve improvements to the streets, bicycle facilities, and pedestrian

¹¹ LADOT *Livable Streets, Maps, Neighborhoods, Networks, and Zones, High Injury Networks*, <https://ladotlivablestreets.org/overall-map/maps>, accessed December 5, 2019.

facilities such as installation or upgrading of crosswalks, traffic signals, and bicycle lanes to prevent deaths and severe injuries.

(9) 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.

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

- Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes based on the 95th percentile queue length using Synchro or a comparable Highway Capacity Manual analysis methodology.
- The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
- The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 miles per hour (mph).

Should a significant impact be identified, mitigation measures to be considered include TDM measures to reduce the project's trip generation, investments in active transportation or transit system infrastructure to reduce the project's trip generation, changes to the traffic signal timing/phasing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to improve safety, not induce greater VMT, and not result in secondary environmental impacts.

(10) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by 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.¹² The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design that serve to reduce VMT.

(11) 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 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 has 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.

(12) LADOT Manual of Policies and Procedures Section 321

The Manual of Policies and Procedures identifies design standards and procedures for various roadway and traffic control elements, including street signs, parking restrictions, traffic signals, street improvements, roadway striping and channelization, and driveway design. Section 321, Driveway Design, of the LADOT Manual of Policies and Procedures recommends 30-foot-wide two-way driveways for multi-family residential projects with more than 25 parking spaces, and also states that wider driveways may be appropriate to accommodate multiple entry lanes.

¹² As stated in the Citywide Design Guidelines, such guidelines apply to all areas, but is particularly applicable to those areas within the City that do not have adopted design guidelines. In cases where the Citywide Design Guidelines conflict with a provision in a Community Plan's Urban Design chapter, specific plan, overlays, or other local design guidelines the community specific requirement shall prevail. Therefore, as the Project is located within the boundaries of the Downtown Design Guide Map, the Project would be required to conform to the provisions of the Downtown Design Guide.

In addition, LADOT requires that driveways providing access up to 100 parking spaces have a minimum 20-foot reservoir distance from the sidewalk, and driveways providing access to 101 to 300 parking spaces should have a minimum 40-foot reservoir distance from the sidewalk. For driveways providing access to more than 300 vehicle parking spaces, a minimum 60-foot reservoir distance from the sidewalk is required, and gates or guard booths should be set back far enough from the back of the sidewalk to ensure that entering or exiting vehicles will not block sidewalk, signalized crosswalks, or extend into street.

(13) Downtown Design Guide: Urban Design Standards and Guidelines

On April 24, 2009, the Los Angeles City Council approved a General Plan Amendment to the Central City Community Plan to revise Chapter V of the Central City Community Plan text to incorporate the Downtown Design Guidelines. The Downtown Design Guide was created to implement common design objectives that maintain neighborhood form and character while promoting design excellence, creative infill development solutions, and sustainable development practices and innovations. As such, the Downtown Design Guide encourages the development of an increasingly livable and sustainable Downtown community. The Downtown Design Guide focuses on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. The successful treatment of these key features, coupled with particular attention to the details of a project within the first 30 to 40 vertical feet, forms the basis for providing high quality development at a human scale.¹³ The updated Downtown Design Guide was adopted by the City Planning Commission in June 2017.

b. Study Area

A transportation analysis study area generally comprises those locations with the greatest potential to experience significant transportation impacts due to a project, as defined by the lead agency. The Project's Study Area includes a geographic area approximately 0.25 mile from the Project Site and was established in consultation with LADOT. There are no Vision Zero projects in the Study Area.

¹³ *City of Los Angeles Downtown Design Guide, adopted by the City Planning Commission on June 8, 2017.*

c. Existing Conditions

(1) Roadway System

The existing roadway system in the Study Area consists of a regional roadway system, including freeways, avenues, and collector and local streets that provide regional, sub-regional, and local access and circulation within the study area.

Primary regional access to the Study Area is provided by State Route 110 (SR-110 or the Harbor Freeway), which is located four blocks west of the Project Site. The Project Site is served by a comprehensive grid system of downtown surface streets with multiple access points to the SR-110 freeway. There are numerous freeway off and on-ramps along SR-110 accessing the downtown area. The closest ramps are on 8th Street approximately 0.36 mile from the Project Site. In addition, ramps are also located at 6th Street and 9th Street approximately 0.4 mile and 0.45 mile from the Project Site, respectively.

The key surface streets serving the immediate area of the Project (within two blocks) are 6th Street, 7th Street, 8th Street, 9th Street, and Olympic Boulevard in the east-west direction; and Figueroa Street, Flower Street, Hope Street, Grand Avenue, Olive Street, and Hill Street in the north-south direction. Figures 1.1 and 1.2 of the Transportation Assessment show the street classifications and street designations¹⁴ from the Mobility Plan 2035, respectively. Table 1.1 of the Transportation Assessment lists the street characteristics in the vicinity of the Project including number of lanes, direction of flow, peak-period tow-away lanes, and bike lanes.

Based on Mobility Plan 2035 and the adopted Downtown Street Standards, the Project would have the following requirements:

- Grand Avenue—Per Mobility Plan 2035, Grand Avenue is a Modified Avenue II and, per the Adopted Downtown Street Standards, is a Modified One-Way Major Class II. Mobility Plan 2035 with the Adopted Downtown Street Standards requires a 45-foot half right-of-way width, a 28-foot half roadway width, a 17-foot sidewalk width, and a 7-foot average sidewalk easement.
- Hope Street—Per Mobility Plan 2035, Hope Street is an Avenue II and, per the Adopted Downtown Street Standards, is a Modified Two-Way Secondary. Mobility Plan 2035 with the Adopted Downtown Street Standards requires a

¹⁴ Specifically, Figure 1.2 of the Transportation Assessment shows the following street designations: Transit Enhanced Network, Neighborhood Enhanced Network, Bicycle Enhanced Network, Bicycle Lane Network, and Pedestrian Enhanced District.

43-foot half right-of-way width, a 28-foot half roadway width, a 15-foot sidewalk width, and a 3-foot average sidewalk easement.

- **8th Street**—Per Mobility Plan 2035, 8th Street is a Modified Avenue II and, per the Adopted Downtown Street Standards, is a Modified One-Way Secondary. The Mobility Plan with the Adopted Downtown Street Standards requires a 45-foot half right-of-way width, a 33-foot half roadway width, a 12-foot sidewalk width, and a 5-foot average sidewalk easement.

(2) Transit Service

The Project Site is served by a number of public transit lines. The Project Site is located approximately two blocks from the Metro 7th Street/Metro Center Station, which contains the Metro Red, Purple, Blue, and Expo Lines and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. The Project's Study Area is currently served by a total of seven local and inter-city transit operators. Metro also operates four rail lines, six Rapid bus lines, three Express lines and 28 Local lines in the Project Area. Additional transit lines within the Study Area include nine LADOT Commuter Express lines, five LADOT Downtown Area Short Hop (DASH) bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line. Table 1.2 of the Transportation Assessment lists the individual bus and rail lines serving the Study Area and indicates the frequency of service. Figure 1.3 and Table 1.2 of the Transportation Assessment illustrate the transit service in the vicinity of the Project Site.

(3) Existing Parking and Site Access

The existing parking structure and surface parking lot currently provide 324 parking spaces, which are used for commercial parking by businesses in the area. Vehicular access for the existing commercial parking structure and surface parking lot is currently provided from four existing driveways with four existing curb cuts: one existing curb cut along Grand Avenue, two existing curb cuts along 8th Street, and one existing curb cut along Hope Street. A chain-link fence lines two sides of the parking lot along 8th Street and Grand Avenue.

(4) Existing Bicycle and Pedestrian Facilities

(i) Bicycle Facilities

Mobility Plan 2035 designates bicycle lanes in the Project vicinity as Tier 1, 2, and 3. Tier 1 Bicycle Lanes are bicycle facilities on arterial roadways with physical separation. Tier 2 and Tier 3 Bicycle Lanes are bicycle facilities on arterial roadways with striped

separation. Bicycle routes that are identified for bike use and include street signage to alert drivers that bicyclists are sharing the roadway spaces; often identified with the use of shared land markings, or “sharrows,” painted on the street.

As shown in Figure 1.5 of the Transportation Assessment, the Study Area includes existing Tier 1 Bicycle Lanes along Figueroa Street, Grand Avenue (south of Wilshire Boulevard), Olive Street (south of 7th Street), and 7th Street. In addition, as shown in Figure 1.6 of the Transportation Assessment, Mobility Plan 2035 intends to implement the designation of Flower Street and Broadway as Tier 3 Bicycle Lanes over the longer term.

(ii) Metro Bike Share

There are nine existing Metro Bike Share stations in the Project’s Study Area at the following approximate locations, as shown in Figure 1.5 of the Transportation Assessment:

- Olive Street & 8th Street;
- Hope Street & 6th Street;
- 7th Street & Grand Avenue;
- 7th Street & Flower Street;
- 7th Street & Broadway;
- 8th Street & Figueroa Street;
- 9th Street & Figueroa Street;
- Grand Avenue & Olympic Boulevard; and
- Hope Street & Olympic Boulevard.

(iii) Pedestrian Facilities

The Project Site is located in an area with well-developed pedestrian facilities, including sidewalks on all streets and crosswalks at all intersections. Currently adjacent to the Project Site, there is a 17-foot sidewalk on Grand Avenue, a 12-foot sidewalk on Hope Street, and a 12-foot sidewalk on 8th Street. There are signalized pedestrian crossings at the four closest intersections to the Project Site (i.e., 8th Street & Hope Street, 8th & Grand Avenue, 7th Street & Hope Street, and 7th Street & Grand Avenue).

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

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

In assessing impacts related to transportation in this section, the City used Appendix G as the thresholds of significance. The methodology and base assumptions used in this analysis were established by LADOT and set forth in the TAG.

b. Methodology

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

As discussed above, with implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As such, this analysis will not go into detail on the anticipated effect of the Project with respect to LOS. As described above, CEQA Guidelines' 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 DEIR section. In accordance with the LADOT TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent.

(2) Vehicle Miles Traveled

As discussed above, the CEQA Guidelines' Appendix G question for transportation impacts was amended to refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in VMT. Accordingly, the City recognized the need to set new significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G question Threshold (b) above. LADOT updated its travel demand model and developed an impact evaluation methodology and transportation impact thresholds based on VMT. In addition, LADOT developed a VMT Calculator tool that is specifically designed and intended to be used to develop project-specific daily household VMT per capita and daily work VMT per employee for land use development projects in the City.

(a) VMT Screening

In accordance with the LADOT TAG, an initial assessment of a Development Project is conducted to determine if a VMT transportation assessment is required. A "Development Project" is described as any proposed land use project that changes the use within an existing structure, creates an addition to an existing structure, or new construction, which includes any occupied floor area. With respect to VMT, if a project requires a discretionary action, and the answer is "no" to either of the following questions from the TAG, then a VMT analysis is not required:

- Would the land use project generate a net increase of 250 or more daily vehicle trips?
- Would the project generate a net increase in daily VMT?

For the purpose of screening for daily vehicle trips, a proposed project's daily vehicle trips should be estimated using the VMT Calculator tool or the most recent edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual. Transportation demand management (TDM) strategies should not be considered for the purpose of screening. If existing land uses are present on the project site, or there were previously terminated land uses that meet the criteria for trip credits, the daily vehicle trips generated by the existing or qualified terminated land uses can be estimated using the VMT Calculator tool and subtracted from the Project's daily vehicle trips to determine the increase in daily vehicle trips.

In addition, based on the LADOT TAG and the City of Los Angeles VMT Calculator User Guide, a portion of, or entirety of a project that contains small-scale or local serving retail land uses is assumed to have less-than-significant VMT impacts and can be excluded from the VMT analysis if less than 50,000 square feet. Local serving retail land uses would include restaurants.

(b) VMT Impacts Thresholds

The LADOT VMT Calculator provides analyses in terms of Household VMT per Capita, and Work VMT per Employee. The LADOT TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance. LADOT has identified thresholds for significant VMT impacts by Area Planning Commission (APC) area in the City.¹⁵

Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the LADOT TAG states that a residential project would result in a significant VMT impact if it would generate Household VMT per Capita more than 15 percent below the existing average Household VMT per Capita for the corresponding APC area. Similarly, an office project would result in a significant VMT impact if it would generate Work VMT per Employee more than 15 percent below the existing average Work VMT per Employee for the corresponding APC area.

The Project Site is located in the Central APC area and, thus, is subject to the following thresholds per LADOT:

- Household VMT per Capita: 6.0
- Work VMT per Employee: 7.6

Therefore, should the Project's average Household VMT per Capita be equal to or lower than 6.0, and should the average Work VMT per Employee be equal to or lower than 7.6, the Project's overall VMT impact would be less than significant.

(i) Travel Demand Forecasting and Behavior Zones

The VMT Calculator¹⁶ uses a project's latitude and longitude to gather information from about the project location, surrounding land uses, travel characteristics, and built environment. The lookup information is obtained from the City of Los Angeles Travel Demand Forecasting (TDF) Model and the City of Los Angeles Travel Behavior Zones (TBZ). The TDF Model considers the traffic analysis zone of the project location to determine the trip length and trip type, which factor into the calculation of the project's VMT. The TBZs informs the VMT Calculator to determine the magnitude of VMT and

¹⁵ Table 2.2-1 of the LADOT Transportation Assessment Guidelines provides VMT thresholds for seven APC areas within the City: Central, East Los Angeles, Harbor, North Valley, South Los Angeles, South Valley, and West Los Angeles.

¹⁶ Version 1.2, November 2019.

vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, the development of the TBZs considered the population density, land use diversity, intersection density, and distance to nearest transit within each Census tract. TBZs are categorized as follows:

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

(ii) Mixed-Use Development Methodology

As detailed in City of Los Angeles VMT Calculator Documentation, the VMT Calculator also accounts for the interaction of land uses within a mixed-use development local to Los Angeles. The mixed-use development methodology considers sociodemographic, land use, and built environment factors for the Project area, including: a project's jobs/housing balance, land use density of the project; transportation network connectivity; availability of and proximity to transit; proximity to retail and other convenient destinations; vehicle ownership rates; and household size.

(iii) Transportation Demand Management Strategies

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. As discussed in City of Los Angeles VMT Calculator Documentation, the following seven categories of TDM strategies are included in the VMT Calculator:

- **Parking**—Reducing, unbundling, permitting, pricing parking.
- **Transit**—Transit subsidies, reduced headways, neighborhood shuttles.
- **Education & Encouragement**—Travel behavior change program, promotions, and marketing.
- **Commute Trip Reductions**—Required commute trip reduction program, vanpool, ride-share.
- **Shared Mobility**—Car-share, bike share, school carpool program.

- **Bicycle Infrastructure**—On-street bike facilities, bike parking, bike facilities, showers.
- **Neighborhood Enhancement**—Traffic calming, pedestrian network improvements.

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 by the California Air Pollution Control Officers Association in the report “Quantifying Greenhouse Gas Mitigation Measures.”¹⁷

(iv) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the LADOT TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions based on the United States Census Bureau’s American Community Survey 2015 5-year estimates for the City of Los Angeles.¹⁸ Employment assumptions were derived from multiple data sources, including the Los Angeles Unified School District (LAUSD) 2012 Developer Fee Justification Study, the San Diego Association of Governments 2012 Activity Based Model, the Institute of Transportation Engineers 2012 Trip Generation, 9th Edition, the U.S. Department of Energy, and other modeling resources.¹⁹ A summary of population and employment assumptions for various land uses is provided in Table 1 of the City of Los Angeles VMT Calculator Documentation.

(3) Hazardous Design Features

In accordance with the LADOT TAG, if a project requires a discretionary action, and the answer is “yes” to either of the following questions, further analysis will be required to assess whether the project would result in impacts due to geometric design hazards or incompatible uses:

- Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?

¹⁷ California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*, August 2010.

¹⁸ The Department of City Planning has provided 2018 American Community Survey 5-Year Average Estimates, but City’s VMT Calculator utilized the 2015 estimate indicated herein.

¹⁹ Although the 2018 LAUSD Developer Fee Justification Study and Trip Generation 10th Edition are now available, the City’s VMT Calculator utilized the editions indicated herein.

- Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?

The LADOT TAG includes a methodology for analyzing impacts with respect to hazardous geometric design features. In order to assess vehicle, bicycle, and pedestrian impacts from an operational and safety perspective, a project needs to be reviewed for its access points, internal circulation, and parking access (e.g., turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]). Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result should also be considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. Using this methodology, the Project design, including proposed infrastructure improvements, land uses, and open spaces, are reviewed to determine if the Project would increase and/or create a hazardous geometric design feature(s).

(4) LADOT Interim Guidance for Freeway Safety Analysis

Pursuant to LADOT's Interim Guidance for Freeway Safety Analysis, as discussed above, the first step is to identify the number of development project trips expected to be added to nearby freeway off-ramps serving the site. If the project adds 25 or more trips to any off-ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queueing impacts following the identified steps in the guidelines. If the project is not expected to generate more than 25 or more peak-hour trips at any freeway off-ramps, then a freeway ramp analysis is not required.

(5) Emergency Access

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

c. Project Design Features

The Project would implement the following project design feature associated with construction activities:

Project Design Feature TR-PDF-1: A detailed Construction Management Plan and Worksite Traffic Control Plan will be prepared and submitted to the City for review and approval prior to the issuance of any demolition or building permits. These plans will include sidewalk/lane closure information, a detour plan, haul routes, and a staging plan to formalize how construction would be carried out and to identify specific actions that would be required to reduce effects on the surrounding community. The plans will also identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The plan details will be coordinated with emergency services and affected transit providers that may need to temporarily close or relocate bus stops. The plans will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

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

Based on the LADOT TAG and use of the LADOT VMT Calculator, the Project would result in a net increase of 1,500 daily trips. As the Project would generate greater than 250 daily trips (i.e., LADOT's screening criteria), further analysis was required to assess the Project and its effect on existing pedestrian, bicycle, and transit facilities. The TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following have been assessed for the Project: Mobility Plan 2035 Policies 2.3 through 2.7; Los Angeles General Plan Health and Wellness Element—Plan for a Healthy Los Angeles; Central City Community Plan; LAMC; Vision Zero; Citywide Design Guidelines; and LADOT Manual of Policies and Procedures. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

(a) Mobility Plan 2035

Mobility Plan 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.

While this is a citywide policy, the Project would support would and not preclude its implementation. Specifically, one of the primary objectives of the Project is to create a

street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses. Streetscape amenities provided by the Project would include a row of street trees along 8th Street, Hope Street, and Grand Avenue as well as pedestrian-scale lighting fixtures and elements, which will conform to Bureau of Street Lighting and Downtown Design Guide standards. Residents on foot would access the residential lobby on the ground floor directly from 8th Street and Grand Avenue. The residential lobby is designed to share space with a commercial/retail/restaurant uses located at the corner of 8th Street & Grand Avenue, with pedestrian access from Grand Avenue. The commercial/retail/restaurant space located at the corner of 8th Street & Hope Street would have two pedestrian access points, one from Hope Street and one from 8th Street. In addition, the Project's close proximity to nearby retail, restaurants and shopping centers would serve to activate the street and promote walkability. Vehicular access to the Project Site for residents would be provided on Hope Street and Grand Avenue. Residents would directly access elevators and stairways that serve the entire building from each parking level. Service, delivery, and trash collecting vehicles would access the Project Site from Hope Street and would exit on Grand Avenue. Furthermore, an on-site porte cochere would be located in the center of the site for pick-up and drop-off. Visitors, taxis, and rideshare vehicles would enter the site from either Hope Street or Grand Avenue, access the internal porte cochere, and exit via Grand Avenue. As such, vehicular loading and drop-off would occur within the building's parking structure, and the Project's site planning would provide a safe and comfortable walking component which would enhance the existing pedestrian environment. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

Mobility Plan Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets.

While this is a citywide policy, the Project would not conflict with its implementation. While Hope Street is designated as a Neighborhood Enhanced Network by the Mobility Plan,²⁰ the Project would not modify Hope Street. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

Mobility Plan Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service.

While this is a citywide policy, the Project would not conflict with its implementation. The Project Site is not immediately adjacent to any Transit Enhanced Streets.²¹ The

²⁰ LADOT Livable Streets, Maps, Neighborhoods, Networks, and Zones, Mobility Plan 2035: Neighborhood Enhanced Network, <https://ladotlivablestreets.org/overall-map/maps>, accessed December 5, 2019.

²¹ LADOT Livable Streets, Maps, Neighborhoods, Networks, and Zones, Mobility Plan 2035: Transit Enhanced Network, <https://ladotlivablestreets.org/overall-map/maps>, accessed December 5, 2019.

Project's net increase in transit trips would support the use and ridership of the region's bus network and supporting transit. As shown in Table 1.2 and Figure 1.3 of the Transportation Assessment, there is substantial existing transit capacity in the Study Area including rail and bus lines as well as seven local and regional transit operators. Therefore, the Project would not cause the capacity of the transit system to be substantially exceeded and the Project would not conflict with Mobility Plan Policy 2.5.

Mobility Plan 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. The existing bicycle system in the Study Area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). As shown in Figure 1.5 of the Transportation Assessment, there are currently Tier 1 protected bicycle lanes within the Project vicinity including on Figueroa Street, 7th Street, Grand Avenue, and Olive Street as part of the Bicycle Enhanced Network (a network of protected bicycle lanes and bicycle paths that provide a higher level of comfort for a variety of users).²² In addition, as part of the Bicycle Lane Network (a network of arterial roadways that is proposed to receive striping treatments to prioritize bicyclists), future Tier 3 Bicycle Lanes are proposed on Flower Street and Broadway, as shown in Figure 1.6 of the Transportation Assessment. Furthermore, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors.

Bicycle parking requirements per LAMC Section 12.21-A,16 include short-term and long-term bicycle parking. The Project would comply with the LAMC and would provide 27 short-term and 224 long-term bicycle parking spaces. Short-term bicycle parking would be available on the ground floor along the sidewalks on Hope Street and Grand Avenue and within the below-grade parking, while long-term bicycle parking would be enclosed from inclement weather and secured from the general public. Both short- and long-term bicycle parking could be accessed by the tower elevators, without needing to cross automobile parking areas. Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

Mobility Plan Policy 2.7 Vehicle Network—Provide vehicular access to the regional freeway system.

²² LADOT *Livable Streets, Maps, Neighborhoods, Networks, and Zones, Mobility Plan 2035: Bicycle Path Network and Bicycle Network*, <https://ladotlivablestreets.org/overall-map/maps>, accessed December 5, 2019

This is a citywide policy that does not apply to the Project because no changes related to vehicular access to the regional freeway system are proposed as part of the Project. Primary regional access to the Project Site is provided by State Route 110 (SR-110 or Harbor Freeway), which runs north-south approximately 0.3 mile west of the Project Site. Major arterials providing regional access to the Project vicinity include Grand Avenue, Figueroa Street, and Olympic Boulevard. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.

Mobility Plan Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas.

The Project would allow service, delivery, and trash collection vehicles to enter the Project Site via Hope Street to reach the internal loading area and exit via Grand Avenue. Visitors, taxis, and rideshare vehicles would enter the Project Site from either Hope Street or Grand Avenue, access the internal porte cochere, and exit via Grand Avenue. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

Mobility Plan Policy 2.17 Street Widening

This citywide policy states that “the overall implications (costs, character, safety, infrastructure, environment) of widening a street should be considered before requiring the widening.” The policy also states that “there are situations where widening the roadway width to the standard dimension could change the character of the street in an undesirable way, prove unnecessarily expensive relative to the resulting benefits, or result in other adverse changes. The Planning Director will resolve any ambiguity with respect to whether any particular street shall be widened.”

As further detailed below per LAMC Section 12.37, the Project would be in compliance with the designated street standards for Grand Avenue and Hope Street. On 8th Street, pursuant to the Project’s proposed Vesting Tentative Tract Map (VTTM), the Project would not widen the street by 10 feet to required standards and would instead request a 2-foot waiver of dedication and improvements on the west side of 8th Street and a 10-foot waiver of dedication and improvements on the east side of 8th Street in order to maintain the existing 23-foot half-roadway width and provide for the 12-foot required sidewalk width, as reflected on the proposed VTTM. LADOT has also determined that the required street widening would not be necessary as the required street widening will not enhance the existing circulation system and there will be no loss in the standard sidewalk width, and has recommended waiving the widening.²³ Therefore, with approval of the

²³ *Email communication from LADOT (Wes Pringle) to Department of City Planning (Polonia Majas), February 11, 2020.*

Project's VTTM that reflects waivers of dedication and improvements pertaining to the required street standards, the Project would be consistent with Mobility Plan Policy 2.17 and the overall intent of the Mobility Plan.

Mobility Plan Policy 3.2 People with Disabilities—Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

The Project would comply with the Americans with Disabilities Act (ADA) guidelines at pedestrian entrances accessible from the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.

Mobility Plan Policy 3.3 Land Use Access and Mix—Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new development consisting of residential and neighborhood-serving commercial/retail/restaurant uses in proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services in a transit-rich area in Downtown Los Angeles. The proposed uses and existing mix of uses in the Project vicinity would be within walking/biking distance and/or accessible via transit services, reducing vehicular trips. Therefore, the Project would not conflict with Mobility Plan Policy 3.3.

Mobility Plan Policy 3.8 Bicycle Parking—Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.

As discussed above per Mobility Plan Policy 2.6, the Project would comply with the LAMC and Bicycle Parking Ordinance requirements. Short-term bicycle parking would be available on the ground floor and within the below-grade parking, while long-term bicycle parking would be enclosed from inclement weather and secured from the general public. Both short-term and long-term bicycle parking could be accessed by the tower elevators, without needing to cross automobile parking areas. Therefore, the Project would not conflict with Mobility Plan Policy 3.8.

Mobility Plan Policy 4.13 Parking and Land Use Management—Balance on-site and off-site parking supply with other transportation and land use objectives.

The Mobility Plan recognizes that an oversupply of parking can undermine broader regional goals of creating vibrant public spaces and a robust multi-modal mobility system and that parking consumes a vast amount of space in the urban environment, which otherwise could be put to valuable alternative uses. The Mobility Plan also observes that large parking lots create significant environmental impacts, detract from neighborhoods'

visual quality, and discourage walking by increasing the distances between services and facilities. The Project would replace the existing parking structure and surface parking lot with a mixed-use project that would provide adequate parking for the residential and ground level commercial/retail/restaurant uses. The proposed parking would be provided within the Project building itself, and above grade parking would be screened from view by architectural features. In addition, the Project would provide reduced residential parking according to the Central City Parking Exception pursuant to LAMC Section 12.21-A,4(p). As such, the development the new building would improve the visual quality of the neighborhood and activate the streets with more pedestrian activity, and the Project would balance parking supply with other transportation and land use objectives. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.

Mobility Plan Policy 5.1 Sustainable Transportation—Encourage the development of a sustainable transportation system that promotes environmental and public health.

The Project would promote a sustainable transportation system and the reduction of VMT by locating housing in proximity to jobs, transit, and services. Project residents would therefore have the opportunity to walk, bike, and ride transit to access the Downtown Center and surrounding areas. The Project Site is within the Central City Parking District (LAMC Section 12.21-A,4(p)) and the Exception Downtown Parking District (LAMC Section 12.21-A,4(i)), which are areas with reduced parking requirements created by City Council due to the area's unique proximity to jobs and housing. As many trips can be made by transit and walking, there would a reduced need for a car in a downtown environment, and therefore, a reduced demand of parking spaces. Furthermore, as discussed above, the Project is located approximately two blocks from the 7th Street/Metro Center Rail Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. Metro also operates four rail lines, six Rapid bus lines, three Express lines and 28 Local lines in the Project Area. Additional transit lines include nine LADOT Commuter Express lines, five LADOT Dash bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line and one Torrance Bus line operating in the Project vicinity. Therefore, the Project would promote the use of walking, biking, and transit, and would support VMT reduction as well as environmental and public health. Therefore, the Project would not conflict with Mobility Plan Policy 5.1.

Mobility Plan Policy 5.4—Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

While this policy applies to large-scale goals relative to fuel sources, technologies and infrastructure, the Project would support and not conflict with this policy. The Project would facilitate the use of alternative-fuel, low-emitting, and fuel-efficient vehicles by

providing parking spaces that are equipped with electric vehicle charging stations. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.

Mobility Plan Policy 5.5—Maximize opportunities to capture and infiltrate stormwater within the City’s public rights-of-way.

As discussed in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, Project construction activities would occur in accordance with City grading permit regulations and National Pollutant Discharge Elimination System (NPDES) requirements to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would include best management practices (BMPs) to collect, detain, treat, and discharge runoff on-site. The Project would include on-site filtration and infiltration drywalls, and the proposed landscaping would reduce the quantity and improve the quality of stormwater runoff generated on the Project Site. Therefore, the Project would support the reduction of runoff entering the stormwater system, and the Project would not conflict with Mobility Plan Policy 5.5.

(b) Los Angeles General Plan Health and Wellness Element—Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles envisions a healthy Los Angeles to be one that includes a balanced, multi-modal, and sustainable transportation system that offers safe and efficient options for all users. As discussed above, the Project is located in an area well-served by a variety of public transit options, including bus transit lines, rail lines, and local shuttle service. The Project Site is located approximately two blocks away from the Metro 7th Street/Metro Center Rail Station, which contains the Metro Red, Purple, Blue, and Expo Lines and is considered a hub of the regional rail network. Metro also operates six Rapid bus lines, three Express lines and 28 Local lines in the Project area. Additional transit lines include nine LADOT Commuter Express lines, five LADOT DASH bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line. These bus lines connect passengers to the Project Site from various locations across the City and throughout Los Angeles County. Additionally, the Project Site is within walking distance of thousands of jobs in the Downtown area.

Furthermore, the Project would provide 251 bicycle parking spaces for the proposed residential and commercial uses. The mixed-use nature of the Project Site and resulting reduction in vehicle miles traveled, as well as the proposed trees and landscaping, would also help to reduce negative health impacts associated with the Project Site’s proximity to freeways. As described in Section II, Project Description, of this Draft EIR, other sustainability features and elements aimed at reducing health-related impacts, such as environmentally-friendly paints and recycled finish materials, would also be incorporated into the Project.

Additionally, the Project would incorporate elements that would promote individual and community pedestrian safety. The Project would include numerous operational design features to enhance safety within, and immediately surrounding, the Project Site, including a 24-hour/seven-day-a-week security plan; sufficient lighting of buildings and walkways as well as parking areas, elevators, and lobbies; and entrances, spaces around buildings, and pedestrian walkways that are designed to be open and visible from surrounding sites.

Therefore, the Project would not conflict with the applicable Health and Wellness Element goals and objectives related to transportation and circulation.

(c) Central City Community Plan

As discussed below, the Project would not conflict with the objectives and policies that support the goals of the Central City Community Plan related to transportation and circulation.

Objective 11-4: To take advantage of the district's easy access to two mass transit rail lines, the freeway system, and major boulevards that connect Downtown to the region.

The Project would be located in an area well-served by a variety of public transit options and is close to many bus transit lines, rail lines, and local shuttle services. Specifically, the Project Site is located approximately two blocks from the Metro 7th Street/Metro Center Rail Station, which contains the Metro Red, Purple, Blue, and Expo Lines and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. Metro also operates six Rapid bus lines, three Express lines and 28 Local lines in the Project area. Additional transit lines include nine LADOT Commuter Express lines, five LADOT DASH bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line. These bus lines connect passengers to the Project Site from various locations across the City and throughout Los Angeles County. Additionally, the Project Site is within walking distance of thousands of jobs in the Downtown area.

Objective 11-6: To accommodate pedestrian open space and usage in Central City.

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.

To maintain and promote a safe pedestrian environment, the Project would incorporate elements that would promote individual and community safety. The Project would include a closed circuit security camera system, lighting of building entries and walkways to provide for pedestrian orientation, and sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, the Project would be designed with entrances/exits, open spaces around buildings, and pedestrian walkways that are open and in view of surrounding sites.

The Project would include street improvements to comply with the requirements of Mobility Plan 2035, with the exception of seeking a waiver of dedication of 2 feet on the west side and 10 feet on the east side of 8th Street through the Project's proposed VTTM. The half roadway width would remain 23 feet rather than the required 33 feet, and the half right-of-way width would be 35 feet. The request would ensure a wider sidewalk consistent with the Downtown Street Standards and with this Community Plan policy. The Project would provide a 12-foot sidewalk width and a six-foot average sidewalk easement, which would be wider than the required 5 feet along 8th Street. In addition, with retail uses provided on the ground floor, the Project would support a pedestrian friendly environment. The rights-of-way would also be improved with street trees to provide a comfortable pedestrian space. Therefore, the Project would provide opportunities to improve Downtown's pedestrian environment, recognizing the various alternative modes of transportation available in the immediate vicinity of the Project Site.

Objective 11-7: To provide sufficient parking to satisfy short-term retail/business users and visitors but still find ways to encourage long-term office commuters to use alternate modes of access.

Parking would be provided on-site in accordance with LAMC requirements and the City's Bicycle Parking Ordinance. The Project would provide 606 vehicle parking spaces designated for the residential units and 34 covenanted vehicle parking spaces for an adjacent building located at 611 W. 6th Street per covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248). The Project would also provide 251 bicycle parking spaces in accordance with the LAMC. Furthermore, as discussed above, the Project Site is located in an area well-served by public transit, which would potentially reduce parking demand. Therefore, the Project would promote bicycle use and public transit to reduce single-occupant vehicle trips.

Objective 11-8: To evaluate, study and monitor current parking policies to assess parking demand as a result of changes in development trends, the growing downtown residential community and the general intensification of land use in the Central City area as surface parking lots become developed with other uses.

As described above, the Project would introduce residential and commercial/retail/restaurant uses to a site that is currently occupied solely by parking uses. The Project Site is located within the Central City Parking District (LAMC Section 12.21-A,4(p)) and the Exception Downtown Parking District (LAMC Section 12.21-A,4(i)), which are areas with reduced parking requirements created by City Council due to the area's unique proximity to jobs and housing. As many trips can be made by transit and walking, there would be a reduced need for a car in a downtown environment, and therefore, a reduced demand of parking spaces. As such, the Project would provide parking in accordance with LAMC provisions and consistent with demand as a result of development trends, and would not conflict with this objective.

(d) Los Angeles Municipal Code

(i) LAMC Section 12.21-A,16 (Bicycle Parking)

As shown in Table IV.G-1 on page IV.G-33, pursuant to LAMC Section 12.21-A.16, the Project would require 243 residential bicycle parking spaces (23 short-term, 220 long-term) and 8 commercial/retail/restaurant bicycle parking spaces (4 short-term, 4 long-term). The Project would provide the required bicycle parking and would not conflict with LAMC Section 12.21-A,16.

(ii) LAMC Section 12.26-J (TDM Ordinance)

The Project proposes 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses. As LAMC Section 12.26-J applies only to the construction of new non-residential gross floor area, and to developments in excess of 25,000 square feet of commercial area, the Project would not be subject to such requirements. Therefore, the Project would not conflict with LAMC Section 12.26-J.

(iii) LAMC Section 12.37 (Highway and Collector Street Dedication and Improvement)

The Project would include the following:

- Grand Avenue—The Project currently meets the 45-foot half right-of-way width, the 28-foot half roadway width, and the 17-foot sidewalk width requirements. The Project would provide the required 7-foot average sidewalk easement and would be in compliance with the Mobility Plan 2035 and Adopted Downtown Street Standards.
- Hope Street—The Project currently meets the 28-foot half roadway width and would dedicate 3 feet to meet the required 43-foot half right-of-way and 15-foot sidewalk widths. The Project would provide the required 3-foot average sidewalk

**Table IV.G-1
Bicycle Parking Spaces Required by City Code**

Land Use	Size	Short-Term		Long-Term		Total Required Bicycle Spaces
		Bicycle Parking Ratio ^a	Required Bicycle Spaces	Bicycle Parking Ratio ^a	Required Bicycle Spaces	
Apartment	25: 1–25 du	1 per 10 du	3	1 per 1 du	25	28
	75: 26–100 du	1 per 15 du	5	1 per 1.5 du	50	55
	100: 101–200 du	1 per 20 du	5	1 per 2 du	50	55
	380: 201–580 du	1 per 40 du	10	1 per 4 du	95	105
	<i>580 du total</i>		23		220	243
Commercial/ Retail/ Restaurant	7,499 sf	1 per 2,000 sf	4	1 per 2,000 sf	4	8
Project Total			27		224	251

du = dwelling units
sf = square feet
^a LAMC Section 12.21-A, 16.
Source: *Eyestone Environmental, 2020.*

easement and would be in compliance with the Mobility Plan 2035 and Adopted Downtown Street Standards.

- **8th Street**—The Project currently meets the required 12-foot sidewalk width. The current half roadway width is 23 feet compared to the requirement of 33 feet. The current half right-of-way width is 35 feet compared to the requirement of 45 feet. The Project would provide a 6-foot average sidewalk easement and a 12-foot sidewalk width, but would seek a 2-foot waiver of dedication and improvements on the west side of 8th Street and a 10-foot waiver of dedication and improvements on the east side of 8th Street. The half roadway width would remain 23 feet rather than the required 33 feet, and the half right-of-way width would be 35 feet. The request would ensure a wider sidewalk consistent with the Downtown Street Standards, and would maintain the consistency of the roadway curb line and the number of traffic lanes with the block east of the Project Site. To the west of the Project Site, the half-roadway width increases to 33 feet between Hope Street and Flower Street but then reduces back to 23 feet between Flower Street and Figueroa Street. As discussed above, LADOT has also determined that the required street widening would not be necessary as the required street widening would not enhance the existing circulation system and there would be no loss in the standard sidewalk width, and has recommended

waiving the widening.²⁴ With approval of the requested waiver through the Project's Vesting Tentative Tract Map, the Project would be in compliance with the Mobility Plan 2035 and Adopted Downtown Street Standards.

The dedication and improvement standards are based on the Mobility Plan 2035 and the adopted Downtown Street Standards. The Project is requesting approval of a waiver to the dedication and improvement standards on 8th Street through its vesting tentative tract map, in order to maintain street width consistency. Therefore, with consideration of the requested waiver for the 2-foot half right-of way dedication requirement in the western portion of 8th Street and the 10-foot half right-of way dedication requirement in the eastern portion of 8th Street, the Project would still comply with LAMC Section 12.37 and the overall intent of the Mobility Plan.

(e) Vision Zero

As noted above, 8th Street has been identified as a High Injury Network. While no Vision Zero Safety Improvements are currently planned near the Project Site,²⁵ Project improvements to the pedestrian environment would not preclude future improvements by the City. As discussed above in Subsection 3.d.(1) per the Mobility Plan, vehicular loading and drop-off would occur within the building's level one porte cochere in the parking structure, and the Project's site planning would provide a safe and comfortable walking component which would enhance the existing pedestrian environment. Therefore, the Project would not conflict with Vision Zero.

(f) Citywide Design Guidelines

Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right of way; and on corner lots, orienting parking as far from the corner as possible. The Project would prioritize pedestrian access by providing multiple pedestrian access points on Grand Avenue and 8th Street. Similar to existing conditions, the Project would also include driveways for vehicular access on Hope Street and Grand Avenue. The Project would eliminate the two existing driveways on 8th Street. Service vehicles would enter the Project Site via the Hope Street inbound lane designated for service vehicles and would exit the Project Site via the Grand Avenue outbound lane. Visitors, taxis, and rideshare

²⁴ Email communication from LADOT (Wes Pringle) to Department of City Planning (Polonia Majas), February 11, 2020. See Appendix G of this Draft EIR.

²⁵ City of Los Angeles, Vision Zero Safety Improvements, <http://ladot.maps.arcgis.com/apps/View/index.html?appid=77df605a3eb142c7a0abc1c65bcf4861>, accessed August 22, 2019.

vehicles would utilize the Hope Street or Grand Avenue access points for internal vehicular loading and drop-off at the internal porte cochere, thereby reducing conflicts with pedestrians. The Project would also maintain continuity of the existing sidewalks and provide average sidewalk easements, further improving the pedestrian experience. Therefore, the Project would not conflict with Citywide Design Guideline 2.

(g) LADOT Manual of Policies and Procedures Section 321

Section 321, Driveway Design, of LADOT's Manual of Policies and Procedures recommends 30-foot-wide driveways for multi-family residential projects with more than 25 parking spaces, and also states that wider driveways may be appropriate to accommodate multiple entry lanes. Both of the Project's driveways along Hope Street and Grand Avenue would be two-way. The Grand Avenue driveway would be 30 feet wide and would provide one inbound lane and one outbound lane. The Hope Street driveway would be 36 feet wide and would provide one inbound lane and one outbound lane for residential use and one inbound lane for service vehicles. Service vehicles would exit the Project Site via the Grand Avenue outbound lane. Visitors, taxis, and rideshare vehicles would enter the site from either Hope Street or Grand Avenue, access the internal porte cochere, and exit via Grand Avenue.

In addition, the LADOT Manual of Policies and Procedures Section 321 identifies a maximum of one driveway allowed along arterial frontages less than 200 feet and a maximum of two driveways for arterial frontages between 200 and 400 feet. The Project Site has arterial frontages less than 200 feet on Grand Avenue and Hope Street and is providing one driveway on each street.

Therefore, the Project would comply with LADOT Manual of Policies and Procedures Section 321.

(h) Downtown Design Guide: Urban Design Standards and Guidelines

As set forth in the Downtown Design Guide, projects should enable people to move around easily on foot, by bicycle, transit, and automobile. Projects should also accommodate cars when necessary and allow people to live easily without one.

The Project would ensure a safe and comfortable pedestrian environment by providing improved and widened sidewalks with street trees to improve pedestrian travel and public use. In addition, the Project's ground floor uses would feature extensive glass windows and doors and continuous balconies beginning on Level 3 of the Project to activate the street and sidewalk and introduce a human-scale element and visual interest to pedestrians, visitors, and occupants.

As discussed above, the Project would be located in proximity to existing and planned bicycle routes and would provide convenient access to multi-modal transportation opportunities for pedestrians and bicyclists. The existing bicycle system in the vicinity of the Project Site consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). There are currently Tier 1 protected bike lanes on Figueroa Street, 7th Street, Grand Avenue, and Olive Street as part of the Bicycle Enhanced Network (a network of protected bicycle lanes and bicycle paths that provide a higher level of comfort for a variety of users). In addition, as part of the Bicycle Lane Network (a network of arterial roadways that are proposed to receive future striping treatments to prioritize bicyclists), Tier 3 Bicycle Lanes are proposed on Flower Street and Broadway. Furthermore, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. The Project would comply with the LAMC and Bicycle Parking Ordinance requirements and would provide 27 short-term and 224 long-term bicycle parking spaces. Short-term bicycle parking would be available on the ground floor along the sidewalks on Hope Street and Grand Avenue and within the below-grade parking, while long-term bicycle parking would be enclosed from inclement weather and secured from the general public. Both short-term and long-term bicycle parking could be accessed by the tower elevators, without needing to cross automobile parking areas.

The Project would be located approximately two blocks from the Metro 7th Street/Metro Center Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is considered a hub of the regional rail network. Numerous bus lines, including local, express and rapid lines, also run in the vicinity. The availability and accessibility of public transit in the Project area is documented by the Project Site's location within a TPA²⁶ and SCAG-designated HQTA.^{27,28}

The Downtown Design Guide encourages variations in setbacks along street frontages and dictates that retail streets in the Financial Core include setbacks of zero to 3 feet. The portions of Hope Street and Grand Avenue adjacent to the Project Site are identified as retail streets in the Financial Core and would meet the setback guidelines. Therefore, the Project would be consistent with the intent of the Downtown Design Guide standards and guidelines related to setbacks.

²⁶ *The City's ZIMAS System (<http://zimas.lacity.org/>) confirms the location of the Project Site within a Transit Priority Area. See Zoning Information File No. 2452 and Parcel Profile Reports for 609 and 625 W. 8th Street and 754 S. Hope Street.*

²⁷ *SCAG, Connect SoCal, The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, High Quality Transit Areas (2045), Exhibit 3.8.*

²⁸ *Metro, High Quality Transit Areas—Southwest Quadrant map.*

In accordance with the Downtown Design Guide, except for the minimum ground-level frontage required for access to parking and loading, no parking or loading would be visible on the ground floor of any building façade that faces a street. The parking podium would be integrated into the design of the building façade so that it would be screened with opaque material to minimize its appearance from the street. In addition, parking and loading access would be located more than 25 feet from a primary building entrance per the Downtown Design Guide. The Project's drop-off zone would also be located within the interior of the Project site to promote sidewalk continuity and reduce conflicts with pedestrians.

As discussed in the Downtown Design Guide, curb cuts and parking/loading entries into buildings shall be limited to the minimum number required and the minimum width permitted. As detailed above in Subsection 3.d.(1)(j) regarding Section 321, the Project would comply with requirements in LADOT's Manual of Policies and Procedures.

Therefore, based on the above, the Project would not conflict with the Downtown Design Guide with respect to design principles addressing the circulation system.

(i) Conclusion

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

(2) Mitigation Measures

The Project would not conflict with the applicable programs, plans, ordinances, and policies addressing the circulation system. Therefore, impacts would be less than significant, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to applicable programs, plans, ordinances, and policies addressing the circulation system 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

As previously discussed above in the Methodology Subsection, the LADOT TAG defines the methodology of analyzing a project's transportation impacts using VMT. If a project requires a discretionary action, and the answer is "no" to either of the following questions, then a VMT analysis is not required and a "no impact" determination can be made for the threshold.

- Would the land use project generate a net increase of 250 or more daily vehicle trips?
- Would the project generate a net increase in daily VMT?

As described in Section II, Project Description, of this Draft EIR, the Project proposes 580 dwelling units and up to 7,499 square feet of commercial/retail/restaurant space. Based on the VMT Calculator results (see Appendix G of this Draft EIR), the Project would generate a net increase of 1,500 daily trips and would result in "yes" in response to both questions above. Thus, further VMT analysis was conducted.

As discussed above, the Project Site is located in the Central APC area and is subject to the following LADOT thresholds for determining VMT impacts:

- Household VMT per Capita: 6.0
- Work VMT per Employee: 7.6

Furthermore, as described in the Methodology Subsection, a portion of, or entirety of a project that contains small-scale or local serving retail land uses (including restaurants) is assumed to have less-than-significant VMT impacts and can be excluded from the VMT analysis if less than 50,000 square feet. Therefore, the Project's approximately 7,499 square feet of commercial/retail/restaurant would not contribute to work-related VMT.

Based on the VMT Calculator results, as shown in Table IV.G-2 on page IV.G-39, the Project would result in a Household VMT per Capita ratio of 3.4, which would be less than the 6.0 threshold. **Therefore, the Project's VMT impacts would be less than significant, and no trip-reducing mitigation measures were necessary or included in this analysis.**

(2) Mitigation Measures

Project-level impacts with regard to VMT pursuant to CEQA Guidelines Section 15064.3 would be less than significant. Therefore, no mitigation measures are required.

**Table IV.G-2
Project VMT per Capita and Employee**

Household			Work		
LADOT VMT per Capita Threshold	Project VMT per Capita	Impact?	LADOT VMT per Employee Threshold	Project VMT per Employee ^a	Impact?
6.0	3.4	No	7.6	0.0	No
<p>^a Based on the LADOT TAG and the City of Los Angeles VMT Calculator User Guide, a portion of, or entirety of a project that contains small-scale or local serving retail land uses is assumed to have less-than-significant VMT impacts and can be excluded from the VMT analysis if less than 50,000 square feet. Local serving retail land uses would include restaurants.</p> <p>Source: The Mobility Group, 2020.</p>					

(3) Level of Significance After Mitigation

Project-level impacts with regard to VMT pursuant to CEQA Guidelines Section 15064.3 and LADOT's TAG 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 (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

The Project Site is rectangular in shape and flat and slopes slightly towards the south edge on 8th Street. Typical of most sites in Downtown, there are no slopes, curves, landscaping or other barriers that would impede visibility or that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the existing residential and commercial uses in the Project vicinity.

The amount of pedestrian activity at surrounding the Project Site is typical of locations in the central Downtown area. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections, and the Project would not make any changes to the roadway system. In addition, the Project would reduce the number of existing curb cuts on the Project Site from four to two. The Project's driveways on Hope Street and Grand Avenue are located near driveways on adjacent garage properties immediately to the north and as far from intersections as possible to maintain continuity of the sidewalk to the greatest extent possible

around the site. Moreover, the Project's longest street frontage, on 8th Street, would run the full block without being interrupted by a driveway. As such, there would be no changes that would impact the High Injury Network, which is identified by Vision Zero to be along 8th Street.

Based on the LADOT TAG, as the Project would provide new driveways and vehicle access as well as modifications to the public right-of-way, further analysis was required to assess potential impacts (e.g., safety, operational, or capacity) for geometric design hazards. Specifically, the Project would provide two driveways—one on Grand Avenue and one on Hope Street. These two-way driveways would replace and be located within the same approximate locations as the existing driveways that serve the current parking facilities on the Project Site. Both proposed driveways for the Project would be perpendicular to the street without sharp curves, and would be designed according to LADOT driveway design guidelines with adequate driveway widths and turning radii. Landscape design would also ensure there will be no impediments to visibility of and by vehicles, bicycles and pedestrians.

Section 321, Driveway Design, of LADOT's Manual of Policies and Procedures recommends 30-foot-wide driveways for multi-family residential projects with more than 25 parking spaces, and also states that wider driveways may be appropriate to accommodate multiple entry lanes. As discussed above in Section 3.d.(1)(j) under Threshold (a), the Grand Avenue driveway would be 30 feet wide with one inbound lane and one outbound lane. The Hope Street driveway would be 36 feet wide with one inbound lane and one outbound lane for residential use, and one inbound lane for service vehicles. Service vehicles would exit the Project Site via the Grand Avenue outbound lane. Visitors, taxis and rideshare vehicles would enter the site from either Grand Avenue or Hope Street, access the internal porte cochere, would exit at Grand Avenue.

The Grand Avenue and Hope Street driveways would be located at the north end of the Project Site, at the maximum possible distance from the intersections with 8th Street. The driveway on Grand Avenue would be located just to the south of the striped bicycle lane where it temporarily ends to transition into a right turn lane for vehicles. This driveway would be located in approximately the same position as the existing driveway and would not change the existing driveway conditions.

Project entry gates would be located at or beyond the required distance from the property line for adequate entry queuing. LADOT provides minimum clearance distances for driveways based on the amount of parking spaces provided. Driveway design guidelines from Section 321 of LADOT's Manual of Policies and Procedures require that driveways providing access to 101 to 300 parking spaces should have a minimum 40-foot reservoir distance from the sidewalk. For driveways providing access to more than 300 vehicle parking spaces, a minimum 60-foot reservoir distance from the sidewalk is

required, and gates or guard booths should be set back far enough from the back of the sidewalk to ensure that entering or exiting vehicles will not block sidewalk, signalized crosswalks or extend into street. As the Project driveway on Hope Street would provide access to 458 vehicle parking spaces above grade, the entry gate would be provided 60 feet from the property line in accordance with LADOT guidelines. As the driveway on Grand Avenue would provide access to 182 vehicle parking spaces below grade, the entry gate would be provided a minimum of 40 feet from the property line in accordance with LADOT guidelines.

Furthermore, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a development project adds 25 or more trips to any freeway off-ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queueing impacts following the identified steps in the guidelines. If the project is not expected to generate more than 25 or more peak-hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As shown in Table IV.G-3 on page IV.G-42, the Project would add fewer than 25 trips to all the freeway off-ramps in both the morning and afternoon peak hours. Therefore, further analysis is not required, and the Project would not increase hazards related to freeway off-ramps.

Based on the above, the Project would not result in a substantial increase in hazards due to a geometric design feature or incompatible use, and impacts with respect to Threshold (c) would be less than significant.

(2) Mitigation Measures

Project-level impacts with regard to hazardous geometric design features or incompatible use would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts with regard to hazardous geometric design features 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.

**Table IV.G-3
Project Trip Volumes Added to Off-Ramps**

Off-Ramp Location	Project-Added Trip Volumes	
	A.M. Peak Hour	P.M. Peak Hour
I-110 Northbound Off-Ramp at 6th Street	1	7
I-110 Southbound Off-Ramp at 6th Street	3	16
SR-110 Northbound Off-Ramp at James M. Wood Boulevard	1	4
I-10 Westbound Off-Ramp at Los Angeles Street	2	8
US-101 Northbound Off-Ramp at Grand Avenue	1	4
Source: <i>The Mobility Group, 2020.</i>		

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

(1) Impact Analysis

(a) Construction

Construction activities associated with the Project (i.e., movement of construction equipment, hauling of soil and materials, daily construction worker traffic, etc.) could potentially impact the provision of emergency services by the LAFD and LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. The nearest designated disaster route to the Project Site is Figueroa Street, which is approximately 0.16 mile west of the Project Site.^{29,30}

On Grand Avenue, the Project would close the right turn lane and bike lane adjacent to the Project Site for the 36-month duration of the construction period. These closures would occur with k-rail. The configuration of southbound Grand Avenue approaching 8th Street would temporarily change from one right lane, bike lane, and three through lanes, to one shared right/through lane and two through lanes. The shared right/through lane would also be marked with sharrows to enable the continuation of the bike route. The sidewalk would be maintained through provision of a covered walkway for pedestrians.

²⁹ *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61*

³⁰ *County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.*

On 8th Street, the Project would close up to 8 feet of the curb lane for the 36-month duration of the construction period. These closures would occur with k-rail. This would require the relocation of the two bus stops on 8th Street (west of Grand Avenue and serving Metro Line 66, LADOT Express Lines 431 and 437, Antelope Valley Line 785, and Santa Clarita Transit Line 799). As part of Project Design Feature TR-PDF-1, construction plan details would be coordinated with emergency services and affected transit providers to determine the need to temporarily close or relocate bus stops. Construction would also require the removal of one on-street parking space, and the closure of the right-turn lane at 8th Street. The configuration of westbound 8th Street approaching Hope Street would temporarily change from one right lane, three through lanes, and one left turn lane to one shared through/right lane, two through lanes and one left turn lane. Construction would also require closure of 8th Street sidewalk adjacent to the Project Site. An alternative pedestrian route would be available on the south side of 8th Street. As the sidewalks on Grand Avenue and Hope Street would remain open, the northwest corner of the 8th & Grand intersection and the northeast corner of the 8th & Hope intersection would remain open for pedestrians with covered protections.

On Hope Street, the Project would temporarily close up to 8 feet of the curb lane on occasion as needed. Closures would occur only during off-peak periods, and would be implemented with traffic cones. In the event of these closures, two on-street parking spaces on Hope Street would need to be temporarily removed. The existing configuration of two northbound lanes on Hope Street would be retained at all times, and the sidewalk would be maintained with a covered walkway for pedestrians.

As such, these short-term and temporary construction activities could temporarily increase response times for emergency vehicles due to travel time delays. Construction staging would occur on-site and off-site (and subject to the Construction Traffic Management Plan to be approved by LADOT). However, with implementation of the Construction Traffic Management Plan and Worksite Traffic Control Plan, prepared pursuant to Project Design Feature TR-PDF-1, emergency access would not be impeded. A Construction Traffic Management Plan (CTMP) and a Worksite Traffic Control Plan (WTCP) would be prepared by the Project Applicant for approval by LADOT prior to the issuance of any demolition or building permits and would specify the details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, as identified above, and on-site/off-site construction staging procedures. The plans would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Project would coordinate the plan details with emergency services and affected transit providers including the need to temporarily close or relocate bus stops. As such, the plans would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, pursuant to California Vehicle Code (CVC) Section 21806, the drivers of

emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Therefore, Project impacts to emergency access, including emergency routes, during construction would be less than significant.

(b) Operation

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

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

In accordance with the TAG, the cumulative analysis of consistency with transportation plans and policies must include consideration of any development projects within the vicinity of the Project Site and any transportation system improvements in the vicinity.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, the Project's impacts would be less than significant. The majority of the programs, plans, policies, and ordinances reviewed 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 would specifically support key policies (such as enhancing pedestrian infrastructure) while nearby related projects would neither support nor interfere with such policies. In addition, each related project would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. **Therefore, the Project, together with the related projects, would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances, and cumulative impacts would be less than significant.**

(b) Vehicle Miles Traveled

As discussed in the LADOT TAG, a development project would have a cumulative VMT impact if it were deemed inconsistent with the SCAG 2020–2045 RTP/SCS, the regional plan to reach state air quality and GHG reduction targets. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. (Refer to Section IV.D, Land Use, of this Draft EIR for a detailed discussion of the Project consistency with the SCAG RTP/SCS.) **Therefore, the Project's cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

(c) Hazardous Geometric Design Features

As previously discussed, the block containing the Project Site and in the overall Study Area are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. According to the Transportation Assessment, a cumulative

impact analysis for potential geometric design or land use hazards should consider the effect of access to related projects in the same block as the Project Site. However, there are no related projects on the same block. As described in Section III, Environmental Setting, of this Draft EIR, the nearest related projects are Related Project Nos. 9 and 10 located at 845 South Olive Street and 888 South Hope Street, respectively, approximately 0.1 mile (540 feet) from the Project Site. In addition, any modifications to the street system proposed as part of the Project and related projects would be reviewed by LADOT to ensure that such modifications do not create dangerous travel conditions. As with the Project, the design of related projects would also be reviewed by the Los Angeles Department of Building and Safety and LADOT during the City's standard required plan review process to ensure all applicable building design requirements are met. In addition, per LADOT's Interim Guidance for Freeway Safety Analysis, a project would not have the potential to result in significant freeway safety unless it adds 25 or more trips to any off ramp in either the morning or afternoon peak hour. As the Project trips would not exceed this screening threshold at any area off ramps, the Project's impacts to freeway safety would be less than significant, and the Project would not make a considerable contribution to cumulative freeway safety impacts. **Therefore, significant cumulative impacts related to hazardous geometric design features would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts with respect to hazardous geometric design features would be less than significant.**

(d) Emergency Access

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the Project vicinity and would not be concentrated to a specific location. Also, as previously discussed, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. As previously mentioned, the nearest related projects are Related Project Nos. 9 and 10 located at 845 South Olive Street and 888 South Hope Street, respectively,

approximately 0.1 mile (540 feet) from the Project Site. The Project's access points and that of these related projects are not located on the same block and would therefore not combine to result in cumulative impacts to emergency access. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to emergency access would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and policies; VMT/CEQA Guidelines Section 15064.3; hazardous geometric design features; and inadequate emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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