

# IV. Environmental Impact Analysis

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## J. Transportation

### 1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is primarily based on the *Transportation Assessment for the Fourth & Central Project (TA)*<sup>1</sup> prepared for the Project, which is included in its entirety in Appendix J-1 of this Draft EIR. The TA was prepared pursuant to the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG), 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 travelled (VMT) rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The TA was approved by LADOT on September 8, 2022. A copy of LADOT's Assessment Letter for the TA is included in Appendix J-1 of this Draft EIR.

### 2. Environmental Setting

#### a) Regulatory Framework

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

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

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<sup>1</sup> Gibson Transportation Consulting, Transportation Assessment for the Fourth & Central Project, Los Angeles, California, June 2022.

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

## (1) Federal

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

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

## (2) State

### (a) *Complete Streets Act*

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

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

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

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

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

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

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

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

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

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

(c) *California Vehicle Code*

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

(d) *Senate Bill 743*

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor’s Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.”

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which was released on 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 (CNRA) finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

Based on these changes, on July 30, 2019, the City of Los Angeles City Council adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City’s formal method of evaluating a project’s transportation impacts. In conjunction with this update, LADOT adopted its TAG in July 2019 and updated it in July 2020, which defines the methodology for analyzing a project’s transportation impacts in accordance with SB 743.

(e) *CEQA Guidelines Section 15064.3*

As discussed above, recent changes to the CEQA Guidelines 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<sup>2</sup> or a stop along an existing high quality transit corridor<sup>3</sup> should be presumed to cause a less than significant transportation impact. Projects that decrease VMT 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 City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

### (3) Regional

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

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 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 GHG reduction targets set by CARB. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020-2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016-2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for four percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a

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

<sup>3</sup> "High-quality transit corridors" are defined in PRC Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within a 0.5 of a major transit stop that is existing or planned. Job centers are defined as areas with significant higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

The 2020-2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the "Core Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020-2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a five percent reduction in VMT per capita, nine percent reduction in vehicle hours traveled, and a two percent increase in work-related transit trips.

#### (4) Local

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

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.<sup>4</sup> 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.

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<sup>4</sup> 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.

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

- **Arterial Streets**: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
  - **Boulevards** represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
  - **Avenues** pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- **Collector Streets**: Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.
- **Local Streets**: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
  - Continuous local streets that connect to other streets at both ends, and/or
  - Non-Continuous local streets that lead to a dead-end.

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

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

- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

(b) *Central City Community Plan*

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located in the Central City Community Plan (Community Plan) Area, which includes the following transportation and circulation objectives that are applicable to the Project:<sup>5</sup>

**Objective 4-4:** To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs.

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

**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.

(c) *Los Angeles Municipal Code*

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

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

<sup>5</sup> City of Los Angeles Department of City Planning, *Central City Community Plan*, adopted January 8, 2003 and amended September 7, 2016. [https://planning.lacity.org/odocument/2ddbde0-a8fb-46e3-a151-f52fd09cc084/Central\\_City\\_Community\\_Plan.pdf](https://planning.lacity.org/odocument/2ddbde0-a8fb-46e3-a151-f52fd09cc084/Central_City_Community_Plan.pdf).



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. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

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

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

*(d) LADOT Transportation Assessment Guidelines*

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model, and transportation impact thresholds based on VMT pursuant to CEQA Guidelines Section 15064.3 and 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 updated the TAG in August 2022. 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 the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.<sup>6</sup>

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<sup>6</sup> Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, 2022.

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

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

(f) *Vision Zero*

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

(g) *Interim Guidance for Freeway Safety*

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

(h) *Citywide Design Guidelines*

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

(i) *Plan for a Healthy Los Angeles*

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.<sup>7</sup> The Plan for a Healthy Los Angeles

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<sup>7</sup> City of Los Angeles Department of City Planning. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, 2015.

addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.”

## **b) Existing Conditions**

### **(1) Street System**

The Project Site is located within the Central City Community Plan area. As shown in Figure II-1 of Chapter II, *Project Description*, of the Draft EIR, the Project Site is comprised of the three distinct areas: North Site, South Site, and West Site. The North Site is generally bounded by commercial uses to the north, a surface parking lot and commercial uses to the east, 4th Street to the south, and Central Avenue to the west. The South Site is generally bounded by 4th Street to the north, Alameda Street to the east, industrial uses to the south, and Central Avenue to the west. The West Site is generally bounded by commercial uses to the north and west, Central Avenue to the east, and 5th Street and commercial uses to the south. The streets in the Project vicinity are under the jurisdiction of the City of Los Angeles. Freeways are under the jurisdiction of Caltrans. Immediate access to the Project Site is provided via two driveways on 4th Street and one driveway on Central Avenue (North Site); one driveway on Alameda Street and three driveways on Central Avenue (South Site); and one driveway on Central Avenue (West Site).

#### **(a) Freeways**

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

Interstate 10 runs in an east-west direction and extends from the Pacific Ocean eastward through Los Angeles County and beyond. In the vicinity of the Project Site, I-10 lies to the south of the Project Site and provides up to five lanes in each direction. The nearest I-10 ramps providing access to the Project Site are located at South Alameda Street. I-10 shares an alignment with I-5 and runs north/south between the East Los Angeles Interchange and the I-5/I-10 interchange near LAC+USC Medical Center.

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

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

#### **(b) Roadways**

The characteristics of the major roadways in the Project vicinity are described below.

(i) *East/West Roadways*

1st Street is located north of the Project Site and is designated as an Avenue II east of Alameda Street and a Modified Avenue II west of Alameda Street within the study area. It provides four travel lanes, two in each direction, with left-turn lanes at select intersections. Bicycle routes with shared lane markings (“sharrows”) are provided in the eastbound and westbound directions within the study area. Parking is generally prohibited east of Alameda Street, with metered spots available on both sides of the street west of Alameda Street.

2nd Street is located north of the Project Site and is designated as a Collector Street east of Alameda Street and a Modified Collector Street west of Alameda Street. Bicycle routes with sharrows are provided in the eastbound and westbound directions west of Santa Fe Avenue within the study area. It provides two travel lanes, one in each direction. Metered and unmetered parking is generally available on both sides of the street within the study area.

3rd Street is located north of the Project Site and is designated as a Collector Street east of Alameda Street and an Avenue II west of Alameda Street. It provides four one-way westbound travel lanes with a striped bicycle lane between San Pedro Street and Santa Fe Avenue. Unmetered parking is generally available within the study area and is metered west of Alameda Street.

4th Place is located northeast of the Project Site and is designated as an Avenue II between Alameda Street and 4th Street and a Collector Street between Molino Street and 4th Street. 4th Place diverges from 4th Street at Hewitt Street and converges with 3rd Street at Alameda Street. It provides four one-way westbound travel lanes between Alameda Street and 4th Street and two travel lanes, one in each direction, between Molino Street and 4th Street. Unmetered parking is generally available within the study area and is metered between Alameda Street and 4th Street.

4th Street is located adjacent to the Project Site and is designated as an Avenue III between Alameda Street and 4th Place, directly adjacent to the Project Site, and transitions to an Avenue II west of Alameda Street. It provides five travel lanes, two in each direction and a bi-directional center lane, east of Hewitt Street and four eastbound lanes west of Hewitt Street. Unmetered parking is generally available on both sides of the street with morning and afternoon peak hour restrictions west of Hewitt Street within the study area. Parking is generally prohibited east of Hewitt Street.

5th Street is designated as an Avenue II west of Central Avenue and a Collector Street east of Alameda Street. 5th Street is discontinuous between Central Avenue and Alameda Street where it intersects with the Project Site. It provides two one-way westbound lanes and a bus-only lane that operates on weekdays from 7:00 AM to 7:00 PM on the north side of the street and a protected bicycle lane on the south side of the street, west of Central Avenue. It provides two travel lanes, one in each direction, east of Alameda Street. Unmetered parking is generally available on both sides of the street east of Alameda Street within the study area.

6th Street is located south of the Project Site and is designated as an Avenue II. It provides four travel lanes, two in each direction, with left-turn lanes at major intersections. Metered and unmetered parking is generally available within the study area.

7th Street is located south of the Project Site and is designated as an Avenue II. It provides four travel lanes, two in each direction, with left-turn lanes at major intersections. Unmetered parking is generally available with morning and afternoon peak hour restrictions on both sides of the street within the study area.

*(ii) North/South Roadways*

San Pedro Street is located west of the Project Site and is designated as an Avenue II. It provides four travel lanes, two lanes in each direction, with left-turn lanes at major intersections. Unmetered parking is generally available south of 6th Street on the west side of San Pedro Street; elsewhere, parking is generally prohibited within the study area. Metered parking is generally available on both sides of the street north of 5th Street within the study area.

Central Avenue is located adjacent to the Project Site and is designated as an Avenue I. It provides four travel lanes, two in each direction, with left-turn lanes provided at major intersections. Metered and unmetered parking is generally available on both sides of the street north of 6th Street within the study area.

Alameda Street is located adjacent to the Project Site and is designated as an Avenue I. It provides four travel lanes, two in each direction, with left-turn lanes at intersections and a two-way left-turn median. Metered parking is available on the west side of the street between 3rd and 4th Streets and on the east side of the street north of 2nd Street; elsewhere, parking is generally prohibited within the study area.

Hewitt Street is located east of the Project Site and is designated as a Collector Street. It provides two travel lanes, one in each direction. Unmetered parking is generally available within the study area.

Molino Street is located east of the Project Site and is designated as a Collector Street. It provides two travel lanes, one in each direction. Unmetered parking is generally available on both sides of the street within the study area.

Merrick Street is located east of the Project Site and is designated as a Collector Street. It provides two travel lanes, one in each direction. Unmetered parking is generally available on both sides of the street within the study area.

*(iii) Mobility Plan Designations*

The Mobility Plan designations for study area roadways are as follows:

- The TEN network includes the following street segments: 1st Street west of Alameda Street, 5th Street west of Central Avenue, 6th Street, San Pedro Street, and Central Avenue.

- The NEN includes the following designated street segments: San Pedro Street, Stanford Avenue south of 4th Street, Santa Fe Avenue, Mateo Street, and 2nd Street between Central Avenue and Alameda Street.
- The BEN designated street segments include: Central Avenue, Alameda Street north of 6th Street, Santa Fe Avenue north of 2nd Street, Mateo Street, 1st Street, 3rd Street west of Alameda Street, 6th Street east of Central Avenue, and 7th Street west of Central Avenue. The BLN includes 2nd Street west of Alameda Street, 3rd Street between 4th Place and Santa Fe Avenue, Santa Fe Avenue south of 2nd Street, and 7th Street east of Central Avenue.
- The PED has designated the following street segments as part of the Pedestrian Segments, where pedestrian improvements could be prioritized to provide better connectivity to and from major destinations within communities: San Pedro Street north of Azusa Street and south of 5th Street, Central Avenue, Alameda Street north of 3rd Street and south of 6th Street, Santa Fe Avenue, Mateo Street, 1st Street west of Vignes Street, 3rd Street between Omar Street and 4th Place, 4th Place between 3rd Street and 4th Street, 4th Street east of 4th Place, 6th Street west of Stanford Avenue, between Central Avenue and Alameda Street, and east of Mateo Street, and 7th Street west of Gladys Avenue and east of Merchant Street.

## (2) Public Transit

The Project Site is located within a Transit Priority Area (TPA), and is served by bus lines operated by Metro, LADOT DASH, and Montebello Bus Lines. In addition to the bus lines, the Metro L Line operates within the study area, with the Little Tokyo/Arts District Station located approximately 0.50 miles from the Project Site. The street-level Little Tokyo/Arts District Station was permanently closed in October 2020 due to construction of the Metro Regional Connector project and will be replaced with a new underground platform, to remain named as the “Little Tokyo/Arts District Station”. The new underground Little Tokyo/Arts District Station will be located at Central Avenue & First Street, and is scheduled to open in late 2022 as part of the Regional Connector Project. See discussion below under the “Future Transportation Improvements” subsection for additional details on the Regional Connector project, which will run through Downtown Los Angeles and will connect the current Metro Rail A, E, and L Lines. A bus bridge [L Line (Gold) bus shuttle] has replaced Metro L Line service between Union Station and the Pico/Aliso Station until the underground station replacement is completed.

**Figure IV.J-1, Existing Transit Service**, shows the various transit routes providing service within the study area. **Table IV.J-1, Existing Transit Service**, summarizes the various transit lines operating in the Project Area for each of the service providers in the region, the type of service (peak vs. off-peak, express vs. local), and frequency of service. The average headways during the peak hour were conservatively estimated using detailed trip and ridership data provided by Metro from April 2019, prior to the State and City response to COVID-19 and the implementation of service improvements as part of Metro’s NextGen Bus Plan, as well as schedule information from each respective transit provider.

**TABLE IV.J-1  
EXISTING TRANSIT SERVICE**

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (minutes)			
			AM Peak Period		PM Peak Period	
			NB/EB	SB/WB	NB/EB	SB/WB
<b>Metro</b>						
18 Wilshire Center – Downtown Los Angeles – Montebello via 6th St and Whittier Blvd	Local	24-Hour	7	6	6	6
30 East Los Angeles – Downtown Los Angeles/Mid-City via Pico Bl & 1st St	Local	24-Hour	13	13	11	11
53 Downtown Los Angeles – CSU Dominguez Hills via Central Ave	Local	4:45 AM – 12:15 AM	10	10	10	10
60 Downtown Los Angeles – Artesia Station via Long Beach Blvd	Local	24-Hour	7	7	6	6
62 Downtown Los Angeles – Hawaiian Gardens via Telegraph Rd	Local	5:00 AM – 12:15 AM	48	30	24	60
720 Santa Monica – Downtown Los Angeles via Wilshire Blvd	Rapid	3:00 AM – 12:30 AM	6	5	5	5
L Line Azusa – East Los Angeles	Rail	4:30 AM – 3:30 AM	8	8	8	8
<b>LADOT DASH</b>						
A Little Tokyo, City West	Local	6:00 AM – 6:30 PM	7	7	7	7
<b>Montebello Bus Lines</b>						
M40 Downtown Los Angeles – Montebello – Whittier via Beverly Blvd	Local	4:45 AM – 11:00 PM	11	12	11	11

## NOTES:

Metro: Los Angeles County Metropolitan Transportation Authority

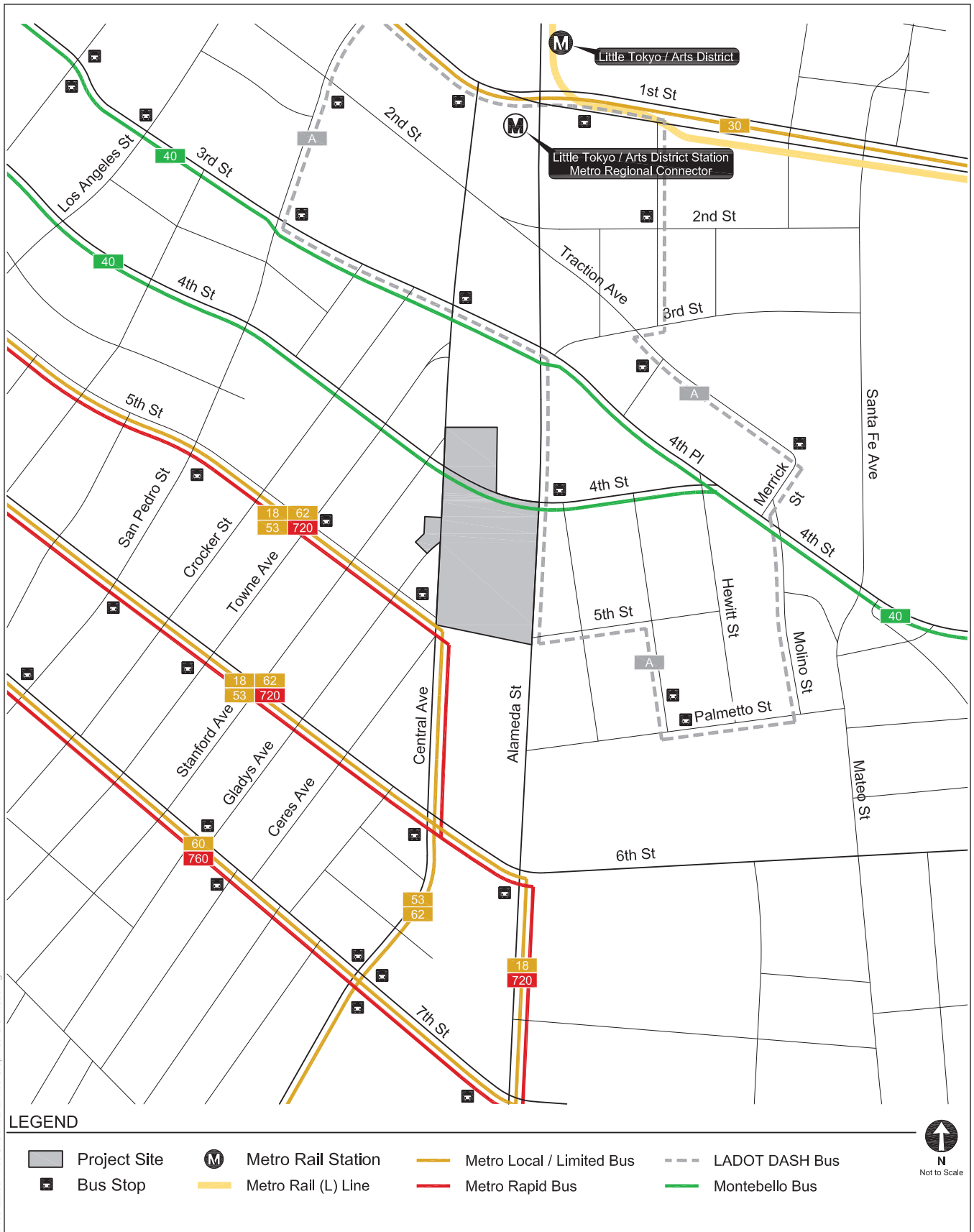
LADOT DASH: Los Angeles Department of Transportation Downtown Area Short Hop

Montebello Bus Lines: City of Montebello

AM Peak from 6-10 AM

PM Peak from 3-7 PM

SOURCE: Gibson Transportation Consulting, TA, 2022.



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SOURCE: Gibson Transportation Consulting, Inc., 2023

Fourth & Central Project

**Figure IV.J-1**  
Existing Transit Service



### (3) Bicycle and Pedestrian Facilities

**Figure IV.J-2, *Existing Bicycle Facilities***, shows existing citywide designated bicycle facilities near the Project Site. There are currently bicycle lanes (Class II) on 3rd Street between San Pedro Street and Santa Fe Avenue, Mateo Street between 4th Street and 6th Street, and 5th Street west of Central Avenue.<sup>8</sup> Bicycle routes (Class III) are located on 2nd Street, west of Santa Fe Avenue, and 1st Street.<sup>9</sup>

The Project study area generally has a patchwork of pedestrian facilities, including sidewalks and accessible curb ramps. The signalized intersections surrounding the Project Site provide pedestrian phasing, continental crosswalk striping,<sup>10</sup> and Americans with Disabilities Act (ADA) accessible ramps. Adjacent to the Project Site, 14-foot-wide sidewalks are provided along Central Avenue, 8-foot-wide sidewalks are provided along Alameda Street, 10- to 26-foot-wide sidewalks are provided along 4th Street, and 10-foot sidewalks are provided along Gladys Avenue. A detailed inventory of pedestrian facilities is provided in the TA, which is included as Appendix J-1 of this Draft EIR.

### (4) Vision Zero

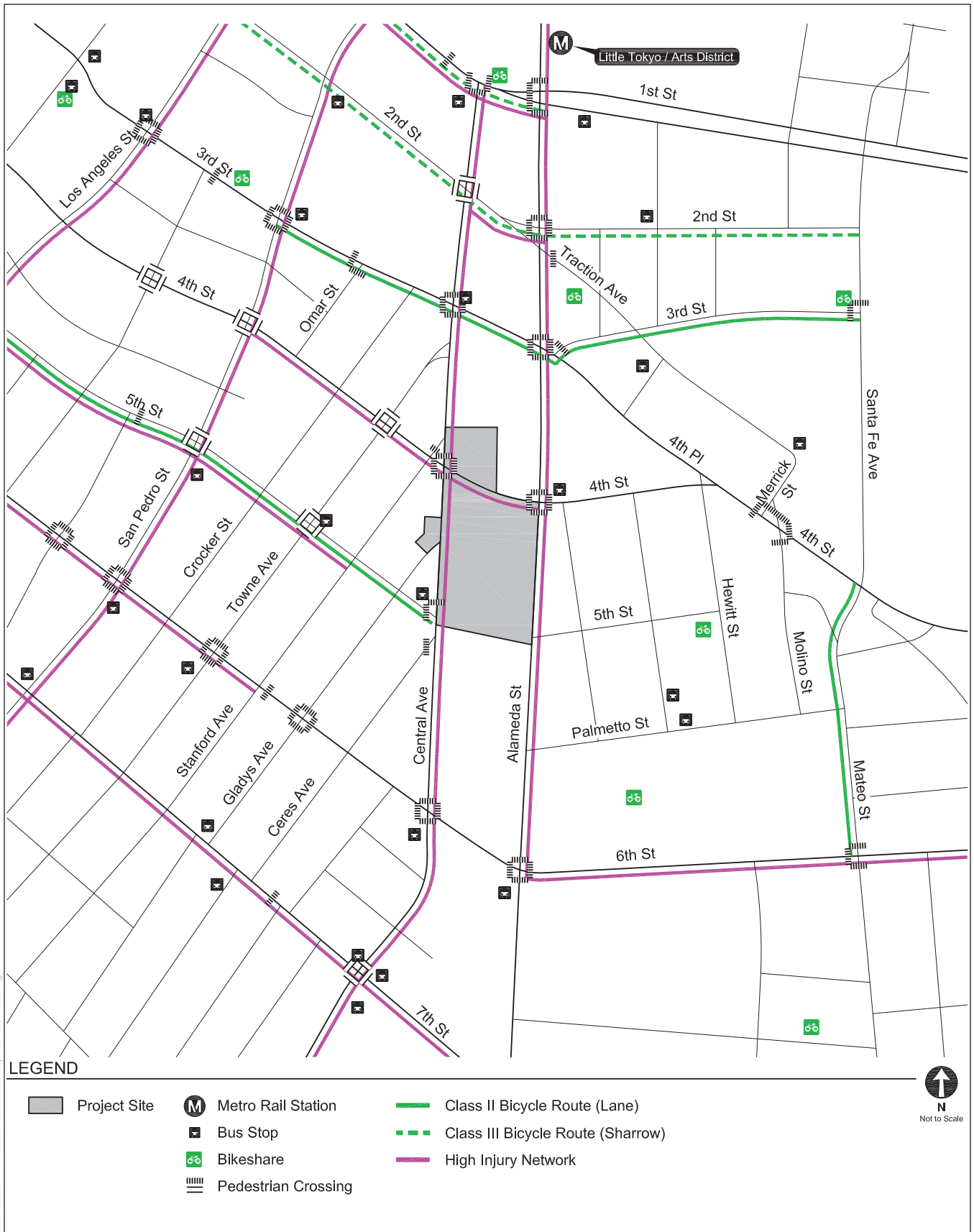
The following roadways located within the Project study area have been identified by the City as part of the HIN:

- 4th Street between San Pedro Street and Alameda Street
- Alameda Street north of 6th Street
- Central Avenue (entirety within the study area)
- 1st Street west of Alameda Street
- 2nd Street between Central Avenue and Alameda Street
- 5th Street west of Stanford Avenue
- 6th Street between Alameda Street and Mateo Street and west of Stanford Avenue
- 7th Street (entirety within the study area)

<sup>8</sup> Class II bicycle lanes are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists.

<sup>9</sup> Class III bicycle routes and bicycle-friendly streets are those where motorists and cyclists share the roadway and there is no separated striping for bicycle travel. Bicycle routes and bicycle-friendly streets are preferably placed on Collector and lower volume Arterial Streets. Bicycle routes with sharrows remind bicyclists to ride farther from parked cars to prevent collisions, increase awareness of motorists that bicycles may be in the travel lane, and shows bicyclists the correct direction of travel.

<sup>10</sup> Continental crosswalks are high-visibility roadway markings designed with thick vertical striping.



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SOURCE: Gibson Transportation Consulting, Inc., 2022

Fourth & Central Project

**Figure IV.J-2**  
Existing Bicycle Facilities

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the City's CEQA Transportation Thresholds,<sup>11</sup> a project would have a significant impact related to transportation if it would:

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

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

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

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

In analyzing potential transportation impacts, the City has adopted the thresholds included in its CEQA Transportation Thresholds, which are the same as the impact questions included in Appendix G of the CEQA Guidelines.

#### b) Methodology

The analysis of potential transportation impacts considers potential Project effects related to (1) potential conflicts with transportation-related plans, ordinances, or policies; (2) a substantial increase in VMT; (3) increased hazards due to a geometric design feature or incompatible use; and (4) emergency access.

The scope of the analysis in the TA was developed in consultation with LADOT. The base assumptions and VMT technical methodologies were identified and agreed to in the LADOT-reviewed and -approved MOU, which is included as Appendix A in the TA. The subsections below describe the methodologies to evaluate each significance threshold.

##### (1) Review for Conflicts with Plans, Programs, Ordinances, or Policies

As previously stated, the TAG requires projects to be reviewed for conflicts with transportation-related plans, programs, ordinances, or policies. For projects meeting the screening criteria set forth in Section 2.1-2 of the TAG, the analysis addresses whether

<sup>11</sup> City of Los Angeles, California Environmental Quality Act (CEQA) Transportation Thresholds, July 2020.

the Project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The focus is on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction in VMT. If the Project does not implement a particular program, plan, policy, or ordinance, it would not necessarily result in a conflict as many of these programs must be implemented by the City itself over time, and over a broad geographical area. Rather, the Project would result in a conflict if it would preclude the City from implementing adopted transportation-related programs, plans and policies.

Regarding cumulative impacts, each of the plans, ordinances, and policies are reviewed to assess potential conflicts that may result from the Project in combination with other development projects in the Project area. The analysis considers whether there would be a significant impact to the environment to which both the Project and other projects contribute. For instance, a cumulative impact could occur if the Project, as well as other future development projects located on the same block, were to preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework.<sup>12</sup>

*(a) Future Transportation Improvements*

The analysis of transportation conditions in the TA considered roadway or other improvements that were funded and reasonably expected to be implemented prior to the buildout of the Project in Year 2030. Refer to the TA for details on future roadway improvements that would result in changes to the physical configuration at the study intersections pertaining to the non-CEQA analysis included in the TA. Below is an overview of improvements that have public-related transit components that have been accounted for in the CEQA analysis of the TA.

*(i) Arts District Active Transportation Program*

Recent Active Transportation Program (ATP) funding was awarded to Council District 14 to create a more multi-modal environment in the Arts District. Construction of the ATP improvements began in Year 2020. ATP improvements within the study area include the installation of bicycle facilities on Santa Fe Avenue, Mateo Street, and Traction Avenue. These bicycle improvements would not require the removal of any travel lanes. The completion of ATP improvements is assumed to occur by the time of the Project buildout year of 2030.

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<sup>12</sup> LADOT Transportation Assessment Guidelines, July 2020, p. 2-4.

(ii) *LADOT DASH Route Expansion*

LADOT is conducting a thorough line-by-line analysis of its existing transit services to determine whether expectations are being met and to identify expansion opportunities to existing transit services and routes. Within the study area, LADOT has proposed changes to the DASH A and DASH F lines.

DASH A currently travels between City West and Little Tokyo and DASH F currently travels between the Financial District and Exposition Park/University of Southern California. With the proposed changes, DASH A would run between the Los Angeles Sports and Entertainment District and Little Tokyo. Adjacent to the Project Site, minor route changes would shift DASH A from Merrick Street to Hewitt Street via Traction Avenue. The proposed changes to DASH F would extend the route to Union Station via 7th Street and Santa Fe Avenue. The timeline of implementation for these improvements to DASH A and F began in July 2021 and would continue through the end of Year 2024.

(iii) *Metro Regional Connector.*

The Metro Regional Connector project is a 1.90-mile underground light-rail system that will extend from the Little Tokyo/Arts District Station to the 7th Street/Metro Center Station, allowing passengers to make direct transfers between the A, B, D, E, and L Lines. The Metro Regional Connector will improve access to both local and regional destinations by providing continuous service between these lines and providing connectors to other rail lines via the 7th Street/Metro Center Station. Three new transit stations will be developed with the operation of the Metro Regional Connector. The closest new transit station will be located at 1st Street & Central Avenue, approximately 0.40 miles north of the Project Site, which will also serve the Metro L Line. The Metro Regional Connector is anticipated to be complete and in operation by Year 2022. The Metro Regional Connector will be underground.

(iv) *Connect US Action Plan*

Metro's Connect US Action Plan (Metro, 2015) is a strategy to encourage walking and bicycling to Union Station and the future Metro Regional Connector 1st/Central Station from surrounding neighborhoods. Connect US Action Plan consists of constructing Esplanades, Walk-Bike Streets, and Walk Streets within existing public (right-of-way) ROW, without additional dedication or acquisition of additional ROW. Within the study area, Alameda Street north of 3rd Street/4th Place will be transformed into an esplanade with widened sidewalks and walkways. A walkway and two-way bicycle path will be provided on Alameda Street north of 2nd Street. 3rd Street from San Pedro Street to Alameda Street will eliminate one travel lane and add two-way bicycle tracks to replace the existing bicycle lane and maintain street parking on both sides of the street. The timeline of implementation for these improvements is currently unknown; however, the improvements were accounted for in the TA for future with Project conditions.

(v) *Metro West Santa Ana Branch*

Metro's West Santa Ana Branch (WSAB) Transit Corridor project would provide a new 19-mile light rail transit line connecting downtown Los Angeles with southeast Los Angeles County. Metro recently selected the Locally Preferred Alternative, which proposes a first phase of the WSAB that includes a 14.8 mile, nine-station transit line connecting the Metro A Line Slauson Station to the City of Artesia. The Final Environmental Impact Statement/Environmental Impact Report for this first phase is scheduled for certification by the end of Year 2022. Metro has also selected Union Station as the terminus for the WSAB project. However, Metro is still in the process of evaluating potential alignment routes that would connect the Metro A Line Slauson Station to Union Station. Thus, the operations of the WSAB and resulting impacts to the Project area are currently unknown at this time. A separate study for this portion of the WSAB is scheduled for completion in early Year 2023.

(2) **Vehicle Miles Traveled**

(a) *VMT Impact Thresholds*

A development project would have a potential impact based on the following considerations:

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

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

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

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

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

*(b) VMT Analysis Methodology*

Per the TAG, household VMT per capita and work VMT per employee for the Project were estimated using the VMT Calculator tool. The VMT Calculator starts with Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition trip generation rates, but then implements the MXD (mixed-use) methodology from the USEPA and utilizes socioeconomic, transit, and trip length data from the Los Angeles citywide travel demand model, which is calibrated to City conditions, to adjust the trips for internalization, transit, and walkability.<sup>13</sup>

As discussed in greater detail in the TA, pages 104 through 108 in Appendix J-1 of this Draft EIR, LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within the City limits. As detailed in City of Los Angeles VMT Calculator Documentation,<sup>14</sup> the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, and the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT. As noted in Section 2.2.2 of the TAG, small-scale retail/restaurant components less than 50,000 sf of larger mixed-use development projects are not considered for the purposes of identifying significant work VMT per employee impacts, as those trips are assumed to be local serving and would have a negligible effect on VMT. The Project is located in the Central APC area for which

<sup>13</sup> The LA VMT Calculator was under development prior to release of the 10th Edition of ITE's trip generation manual in late 2017. The VMT Calculator was validated to LA conditions based on the empirical counts conducted at market rate residential, affordable housing, office, and mixed-use sites in the City, regardless of the source of the rates used as a starting point.

<sup>14</sup> City of Los Angeles VMT Calculator Documentation, Los Angeles Department of Transportation and Los Angeles Department of City Planning, May 2020.

the TAG details daily household VMT per capita as 6.0 and the daily work VMT per employee as 7.6.

Other types of one-way trips included in the VMT Calculator include Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use at the Project Site), Home-Based Other Attraction (trips to a non-workplace destination at the Project Site originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination at the Project Site originating from a non-residential use). These trip types are not factored into the household VMT per capita and work VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, those trips were factored into the calculation of total Project VMT for screening purposes when determining that VMT analysis for the Project would be required.

In addition, according to the TAG, regional-serving retail can lengthen trips and increase VMT because it is likely to shift business away from local-serving retail options. Conversely, local-serving retail (which includes restaurant space) tends to shorten trips and reduce VMT because it attracts trips from nearby residences and businesses that would otherwise travel further to find suitable options. As detailed in the TAG, retail stores less than 50,000 sf within mixed-use development projects are considered local-serving and are assumed to have less than significant VMT impacts.

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City. The Project is located in an Urban (Zone 4) TBZ based on the latitude and longitude of the project address.

As detailed in City of Los Angeles VMT Calculator Documentation, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following socio-demographic, land use, and built environment factors for a project area:

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



The VMT Calculator also determines a project's VMT based on trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the traffic analysis zones within 0.125 miles of a project to determine the trip lengths and trip types, which factor into the calculation of a project's VMT.

The VMT thresholds identified in the TAG are further based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments' Activity Based Model, Trip Generation Manual, 9th Edition (ITE, 2012), the United States Department of Energy, and other modeling resources. A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.<sup>15</sup>

The Project VMT impact is considered significant if any (or all) of the Project land uses exceed the impact criteria for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses would be considered.

Additionally, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures. The following seven categories of TDM strategies are included in the VMT Calculator: parking, transit, education and encouragement, commute trip reductions, shared mobility, bicycle infrastructure, and neighborhood enhancement.

TDM reductions within each of these categories and for the Project were applied according to the guidance found in the City of Los Angeles VMT Calculator Documentation and the TDM Strategies Appendix, which have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in the California Air Pollution Control Officers Association (CAPCOA) research and methodologies as described in *Quantifying Greenhouse Gas Mitigation Measures*.<sup>16,17,18</sup> Residential and commercial land use TDM credits are calculated separately, as certain TDM measures are more appropriately employed for commercial or residential land uses. For example, for commercial tenants, vanpools and rideshare may be effective tools to reduce employee solo vehicle trips. However, vanpools would be difficult to implement for residents who are traveling from the Project to many disparate

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<sup>15</sup> City of Los Angeles, Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), *City of Los Angeles VMT Calculator Documentation*, November 2019.

<sup>16</sup> LADOT and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation Version 1.3*, May 2020.

<sup>17</sup> LADOT, Attachment G Transportation Demand Management Strategies in LA VMT Calculator, November 2019.

<sup>18</sup> California Air Pollution Control Officers Association (CAPCOA), *Quantifying Greenhouse Gas Mitigation Measures*, August 2010.

destinations. For residents, unbundling parking is more effective because residents are incentivized to reduce car ownership to save on condominium unit purchase price or monthly rental costs for a vehicular parking space. Additionally, the net effectiveness of commute trip reductions is reduced for the commercial land uses as those measures are only applicable to the work trips made by commercial land use employees, rather than the trips made by the commercial patrons.

The cumulative analysis considers both short- and long-term Project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis described above. Cumulative effects are determined through a consistency check with the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS). The 2020–2045 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less-than-significant cumulative impact on VMT. Development in a location where the 2020–2045 RTP/SCS does not specify any development may indicate a significant impact on transportation. As the Project Site is in an HQTAs, where the 2020–2045 RTP/SCS encourages development, this does not apply to the Project. However, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less- than- significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City’s efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of SCAG’s 2020–2045 RTP/SCS.<sup>19</sup>

Projects that both demonstrate a project impact by exceeding an efficiency-based VMT threshold and that are not deemed to be consistent with the 2020–2045 RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether such a project’s cumulative impact on VMT is significant. This analysis could be conducted by running the City’s Travel Demand Forecasting model with the cumulative “no project” scenario representing the adopted 2020–2045 RTP/SCS cumulative year conditions (as incorporated into the City’s model) and the cumulative “plus project” scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the Project. Citywide VMT, household VMT per capita, or work VMT per employee (depending on project type) would be calculated for both scenarios, and any increase in VMT, household VMT per capita, or work VMT per employee (depending on project type) above that which was forecast in the adopted 2020–2045 RTP/SCS would constitute a significant cumulative impact because it could jeopardize regional air quality conformity or GHG reduction findings.<sup>20</sup>

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<sup>19</sup> LADOT, *City of Los Angeles Transportation Assessment Guidelines*, July 2020, page 2-10.

<sup>20</sup> LADOT, *City of Los Angeles Transportation Assessment Guidelines*, July 2020, page 2-10.

### (3) Hazardous Geometric Design Features

For vehicle, bicycle, and pedestrian safety impacts, a review is conducted for all Project access points, internal circulation, and parking access from an operational and safety perspective (e.g., turning radii, driveway queuing, line-of-sight for turns into and out of project driveway[s]). Project access plans are reviewed in light of commonly accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant.<sup>21</sup> The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at Project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the Project Site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle and pedestrian facilities the Project driveway(s) crosses and the relative level of utilization. The analysis considers operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result.
- The physical conditions of the Project Site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.
- The Project location or Project-related changes to the public right-of-way relative to proximity to the HIN or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

#### (a) Freeway Safety Analysis

In addition, in accordance with LADOT's interim guidance on freeway safety analysis issued in May 2020, a freeway safety analysis was conducted to evaluate whether the addition of Project traffic could cause or lengthen an off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.<sup>22</sup>

The interim guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis

<sup>21</sup> One example of traffic engineering design standards includes, but is not limited to Section 321 of LADOT's Manual of Policies and Procedures, which provides guidance on driveway design.

<sup>22</sup> City of Los Angeles Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, May 2020.

is not required. The Project is projected to add 25 or more trips to the following six freeway off-ramps during the morning and afternoon peak hours:

- US-101 Northbound Off-Ramp to 4th Street
- US-101 Southbound Off-ramp to Los Angeles Street
- I-5 Northbound Off-Ramp to 7th Street
- I-5 Southbound Off-Ramp to 4th Street
- I-10 Eastbound Off-ramp to Central Avenue
- I-10 Eastbound Off-ramp to Alameda Street

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

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

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

#### (4) Emergency Access

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

### c) Project Design Features

The following Project Design Features are applicable to the Project.

**TRAF-PDF-1: Construction Management Plan.** Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan, including haul routes and a staging plan, will be prepared and

submitted to the City for review and approval. The Construction Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

## d) Analysis of Project Impacts

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

### (1) Impact Analysis

The TAG, Table 2.1-1, *City Documents that Establish Regulatory Framework*, includes a list of City plans, policies, programs, ordinances, and standards that should be consulted to help identify potential conflicts with projects undergoing CEQA review. Also, Attachment D, Plan Consistency Worksheet, of the TAG includes screening questions for determining

Project applicability to relevant plans, policies, and programs, in order to assess whether the Project would preclude their implementation. The questions and responses to each screening question in Attachment D of the TAG is included in Appendix E of the TA. Upon review of Attachment D of the TAG and the responses included in Appendix E provided in the TA, the following plans, policies, and programs were determined relevant to the Project and are analyzed in this EIR section: Mobility Plan 2035, LAMC sections related to Bicycle Parking and the TDM Ordinance, Central City Community Plan, Vision Zero Corridor Plans, Plan for a Healthy Los Angeles, and Citywide Design Guidelines. Based on the review, it was determined that there are no applicable Specific Plans since the Project Site is not located within an area governed by a Specific Plan.

There are no streetscape plans near the Project Site. Nevertheless, the Project would not preclude the City from future streetscape improvements. Furthermore, the Project Site would not preclude improvements proposed as part of Metro's *Connect US Action Plan*<sup>23</sup> project, which includes streetscape enhancements along Alameda Street and 3rd Street in the Project area.

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

(a) *Mobility Plan 2035*

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. The Mobility Plan combines “complete street” principles As evaluated in detail in with the following five goals:

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

The Mobility Plan further enumerates a variety of policies and programs in support of these goals. These goals and policies are evaluated in Table 1, *Consistency of the Project with Applicable Policies and Programs of Mobility Plan 2035*, in Appendix J-2 in this Draft EIR. As evaluated therein, the Project would not conflict with applicable policies of the Mobility Plan.

The Mobility Plan identifies corridors in the Project area as components of various “mobility-enhanced networks.” Networks, which are intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles that are applicable to the Project include the Transit Enhanced

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<sup>23</sup> Metro, *Connect Us Action Plan*, May 2015.  
[http://libraryarchives.metro.net/DB\\_Attachments/150520\\_Connect\\_US\\_Master\\_Plan.pdf](http://libraryarchives.metro.net/DB_Attachments/150520_Connect_US_Master_Plan.pdf).

Network (TEN), the Bicycle Enhanced Network (BEN), and the Pedestrian Enhanced District (PED). Central Avenue and parts of Gladys Avenue and 4<sup>th</sup> Street in the study area are included as part of the TEN, BEN, and PED.

The Project would provide street and sidewalk dedication and improvements to meet the Mobility Plan standards along all Project frontages. Central Avenue and Gladys Street currently meet Mobility Plan ROW standards for an Avenue I and Local Street, respectively; however, dedications along Alameda Street and 4<sup>th</sup> Street would be provided adjacent to the Project Site to meet the standards for Avenue I and II, respectively. The Project would provide a 6-foot dedication along the 4<sup>th</sup> Street ROW and a 5-foot center line adjustment (a total of 11 feet) to meet the Mobility Plan's 86-foot standard for Avenue II ROW and 28-foot street width. The Project would provide a 10-foot dedication along the Alameda Street ROW to meet the Mobility Plan's 50.5-foot standard for Avenue I ROW and 35-foot street width.

The public sidewalks along Central Avenue, 4<sup>th</sup> Street, Alameda Avenue, and Gladys Avenue would be removed and replaced with upgraded and tree lined sidewalks. Public sidewalks, which currently vary from 10 to 16 feet, would be replaced by new sidewalks 15 feet in width along the Project's frontages. Pedestrian crosswalks at the intersections of Alameda Street and 4<sup>th</sup> Street, 4<sup>th</sup> Street and Central Avenue, and at the corner of 5<sup>th</sup> Street and Central Avenue would be maintained and provide connections between the North, South and West Sites.

The Project would provide 2,475 vehicle parking spaces, 146 short-term bicycle parking spaces, and 596 long-term bicycle parking spaces, consistent with LAMC Sections 12.21 A.4 and 12.21 A.16(a)(2) requirements, as required by the Mobility Plan.

In summary, the Project was conceived as a pedestrian- and transit-oriented mixed use community organized around a network of publicly-accessible plazas, pocket parks, pedestrian throughways, and open-air pedestrian pathways between buildings on each Site with activated street frontages that create a high-quality pedestrian experience. The Project Site is served by bus lines and by Metro's Little Tokyo Regional Connector Station (an underground rail line) at 1<sup>st</sup> and Central Streets. The Project would provide pedestrian and bike improvements to serve the Project, as well as the surrounding Arts District, Fashion District, and Little Tokyo communities. The Project would limit vehicle, pedestrian, and bicycle interruptions along Central Avenue, Alameda Street, and 4<sup>th</sup> Street by reducing and improving existing curb cuts to meet current City standards for two-way traffic operations. The Project would also enhance pedestrian access within and around the Project Site by providing publicly-accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The South Site would also provide an internal east-west drive aisle with pedestrian throughways along both sides that would connect Central Avenue and Alameda Street. The pedestrian throughways would provide safety features that would physically separate vehicle traffic from pedestrian traffic. Secured bicycle parking facilities would also be provided throughout the Project Site. Further, the Project does not propose

modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along a street with an existing bicycle facility. Thus, the Project would promote active transportation modes through these measures, thereby reducing the Project VMT. Therefore, the Project would not conflict with any of the applicable goals, policies or programs in Mobility Plan 2035 adopted to protect the environment and reduce VMT.

(b) *Bicycle Parking Ordinance*

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. Based on the proposed land uses, the Project would require a total of 146 short-term and 596 long-term bicycle parking spaces. The Project's proposed 740 bicycle parking spaces meet the LAMC requirements for on-site bicycle parking supply. Therefore, the Project is consistent with LAMC Section 12.21 A.16.

(c) *TDM Ordinance*

LAMC Section 12.26 J, the TDM Ordinance (1993) establishes TDM requirements for non-residential projects, in addition to non-residential components of mixed-use projects in excess of 25,000 square feet. The total non-residential component of the Project exceeds 25,000 square feet. Therefore, the Project would be subject to the requirements of LAMC Section 12.26 J.

Key requirements of the TDM Ordinance as applied to the Project include providing carpool/vanpool loading areas, walkways between buildings, and public sidewalks. The Project would provide pedestrian connectivity both within and surrounding the Project Site with walkways between buildings on all Sites. The Project would also incorporate the following TDM measures for residents, visitors, and employees:

- Reduced parking supply
- Parking cash-out
- Bicycle share station
- Bicycle parking per LAMC, including short-term and long-term parking facilities.

Consistent with the requirements of LAMC Section 12.21 J, the Project would provide the above TDM and trip reduction measures, as applicable to the Project.

(d) *Central City Community Plan*

As previously stated, the Project is located in the Central City Community Plan area. As evaluated in **Table 2**, *Consistency of the Project with Applicable Policies and Programs of the Community Plan*, in Appendix J-2 of this Draft EIR and summarized here, the Project provides determinations of whether the Project would conflict with any of the applicable policies and programs in the Community Plan. As shown below, the Project would not conflict with any of the applicable policies and programs.



(e) *Vision Zero*

As discussed above, Vision Zero is a plan that strives to eliminate traffic-related deaths in Los Angeles by 2025 through strategies, such as modifying streets to better serve vulnerable road users. Adjacent to the Project Site, the following streets are identified in the City's HIN:

- 4th Street between San Pedro Street and Alameda Street
- Alameda Street north of 6th Street
- Central Avenue (entirety within the study area)

No Vision Zero safety improvements are currently planned along the streets identified above. Nonetheless, the Project's proposed improvements to the pedestrian environment would not preclude any Vision Zero safety improvements by the City. Therefore, the Project would not conflict with Vision Zero policies adopted to protect the environment.

(f) *Plan for a Healthy Los Angeles*

As discussed above, the Plan for a Healthy Los Angeles provides guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The Project would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities with separate pedestrian and vehicle access points and active street frontages. As discussed in detail in **Table 3, Consistency of the Project with Applicable Policies of the Health and Wellness Element**, in Appendix J-2 of this Draft EIR, the Project would promote increased access to basic amenities by providing publicly-accessible open spaces including paseos and plazas and would replace underutilized existing uses with housing and employment opportunities. Further, the Project would support healthy lifestyles by locating jobs adjacent and near transit (Metro Local, Rapid, and Light Rail; LADOT DASH, and Montebello Bus Lines), providing bicycle amenities, and enhancing the pedestrian environment by providing open space amenities, shade trees, and landscaping. The Project is also estimated to generate lower VMT per capita for residents and employees than the areawide average, as demonstrated below in the Threshold b) impact discussion, which reduces GHG emissions. Thus, the Project would not conflict with, limit, or preclude the City's ability to implement programs and policies in furtherance of Plan for a Healthy Los Angeles.

(g) *Citywide Design Guidelines*

The Pedestrian-First Design approach of Citywide Design Guidelines identifies design strategies that "create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of pedestrian travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety by putting

eyes and feet on the street.”<sup>24</sup> The Project is compared to applicable policies of the Citywide Design Guidelines in **Table 4, Consistency of the Project with the Applicable Policies of the Citywide Design Guidelines**, in Appendix J-2 of this Draft EIR. As discussed therein, Objectives 1, 5, and 6 apply to pedestrian safety, open space for public gathering, and streetscapes. Objective 1 is to consider neighborhood context and linkages in building and site design. This objective establishes standards for site planning, building entrances, sidewalks, and off-site parking and driveways. Objective 5 addresses open space including publicly-accessible open space, street trees, and sidewalk amenities. Objective 6 provides for improved streetscapes and pedestrian safety, such as lighting and security improvements. The Citywide Design Guidelines recommend carefully incorporating vehicle access such that it does not degrade the pedestrian experience; orienting parking and driveways toward the rear or side of buildings and away from the public right-of-way; and the implementation of amenities to actively engage with streets and public space and maintain human scale.

The Project design includes widened sidewalks, pedestrian amenities such as public open spaces consisting of interconnected plazas and paseos, and vehicular access driveways in accordance with the City’s design considerations. Additionally, street trees would be included as part of the Project’s streetscape plan to provide adequate shade and a more comfortable environment for pedestrians. The orientation of the Project provides direct connection to the public right-of-way. Thus, the Project would align with the Pedestrian-First Design approach of Citywide Design Guidelines to provide a safe, comfortable, and accessible experience for all transportation modes. The Project would not conflict with the Citywide Design Guidelines.

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

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Impacts regarding the Project’s consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities 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.

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<sup>24</sup> City of Los Angeles City Planning, Urban Design Studio, Citywide Design Guidelines, October 2019, pg. 13.

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

**(1) Impact Analysis**

The Project includes several design features to reduce the number of single occupancy vehicle trips to the Project Site. For the purposes of this analysis, the following TDM measures that are incorporated into the Project design and required by the City's current TDM Ordinance were accounted for in the VMT evaluation:

- **Reduced Parking Supply:** The Project would provide less on-site vehicle parking than the amount required by the direct application of LAMC parking rates, without consideration of allowable parking reduction mechanisms such as reduced parking rates for developments within a State Enterprise Zone or Central City Parking District and vehicle parking reductions related to bicycle parking replacement. A reduced parking supply makes parking less available and, therefore, encourages the use of non-automobile modes to and from the Project Site and reduces VMT.
- **Parking Cash-Out:** The Project would comply with the state parking cash-out law, which requires employers who provide subsidized parking to offer employees a cash allowance in lieu of a parking space.
- **Bicycle Share Station:** The Project would also provide a bicycle share station in order to support first-mile/last-mile service for transit users and reduce reliance on personal automobiles.
- **Bicycle Parking per LAMC:** The Project would provide bicycle parking spaces in compliance with the requirements of the LAMC.

Should implementation of the selected TDM measures become infeasible for the Project, substitute TDM measures would be implemented that would be equivalent or superior in reducing vehicle trips and VMT. As calculated by the VMT Calculator, the Project is estimated to generate a total of 13,724 daily vehicle trips and a total daily VMT of 89,694. Additional details regarding the VMT analysis are available in the TA, which is included as Appendix J-1 of this Draft EIR.

**(a) Residential VMT**

The VMT Calculator estimates that the Project would generate 13,522 total daily household VMT. The daily residential VMT per capita is estimated at 3.9 for the Project, below the threshold of 6.0 for the Central APC. Thus, the Project would have a less-than-significant impact on residential VMT per capita as estimated by the VMT Calculator.

**(b) Work VMT**

The VMT Calculator estimates that the Project would generate 13,360 total daily work VMT. The daily work VMT per employee is estimated at 6.5 for the Project, below the threshold of 7.6 for the Central APC. Thus, the Project would have a less-than-significant impact on work VMT per employee as estimated by the VMT Calculator.

(c) *Retail VMT*

The Project as evaluated in the TA included 114,112 sf of restaurant and retail uses, which assumed 45,266 sf of retail uses and 68,846 sf of restaurant uses. Refinements to the Project following completion of the TA have reduced the amount of restaurant space from 68,846 sf to 68,299 sf, for a reduction of 547 sf. As discussed in Chapter II, Project Description, the Project's overall square footage would be 113,565 sf. Thus, the additional 547 sf analyzed in the TA represents a conservative analysis of transportation impacts evaluated within this Transportation section. As evaluated in the TA, collectively, the Project's retail and restaurant use exceeds the 50,000 square feet threshold between local-serving and regional-serving retail identified in the TAG. Notwithstanding, the Project does not fit the TAG's definition of a regional-serving retail project and, therefore, additional VMT analysis of retail and restaurant uses beyond what is provided by the VMT Calculator is not needed. As detailed in the following discussion, the Project is not a retail project, is not considered regional-serving, and would serve the local community. Thus, the Project was not modeled as a regional-serving retail project.

The TAG's definition of a regional-serving retail project explicitly includes the term "retail project." The Project is a mixed-use development that is primarily made up of residential, hotel, and office uses. The retail and restaurant uses comprise less than 10 percent of the total Project floor area and are not the primary Project uses. The retail and restaurant uses are intended to serve Project residents, hotel guests, employees, transit riders, and the surrounding community.

While the total retail and restaurant components of the Project total 114,112 sf as evaluated in the TA, it is not anticipated that any single tenant would occupy a space larger than 50,000 sf. To evaluate a conservative scenario, however, the commercial components were identified as stand-alone trip generators, even though the variety of uses are expected to have significant interaction without triggering an off-site vehicle trip. According to the OPR Technical Advisory, because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local serving. For these reasons, through the MOU process, LADOT agreed that the retail and restaurant uses would generally serve the local needs of the area.<sup>25</sup> As stated in the OPR Technical Advisory (page 16), adding retail opportunities into the urban fabric improves retail destination proximity and, therefore, shortens trips and reduces VMT. Therefore, the Project would have a less-than-significant impact on retail VMT per employee.

**Project-generated VMT would be below the City's household and work VMT significance thresholds, as applicable. Therefore, the Project would result in a less-than-significant VMT impact.**

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<sup>25</sup> Gibson Transportation Consulting, Transportation Assessment for the Fourth & Central Project, Los Angeles, California, p. 110, June 2022.

## (2) Mitigation Measures

Impacts regarding the Project's consistency with CEQA Guidelines section 15064.3, subdivision (b) would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Impacts regarding the Project's consistency CEQA Guidelines section 15064.3, subdivision (b) 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 geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

### (1) Impact Analysis

As discussed in the Initial Study (Appendix A of this Draft EIR), impacts regarding geometric hazards were determined to be less than significant. Thus, as determined therein the Project would have a less than significant impact with respect to Threshold (c). However, this Draft EIR includes the following supplemental analysis which addresses freeway safety. This supplemental analysis does not change the less than significant impact finding in the Initial Study.

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

- US-101 Northbound Off-Ramp to 4th Street
- US-101 Southbound Off-ramp to Los Angeles Street
- I-5 Northbound Off-Ramp to 7th Street
- I-5 Southbound Off-Ramp to 4th Street
- I-10 Eastbound Off-ramp to Central Avenue
- I-10 Eastbound Off-ramp to Alameda Street

In accordance with the applicable methodology, the 95th percentile ramp queue was calculated using the Highway Capacity Manual, 6th Edition (Transportation Research Board, 2016) (HCM) methodology. Conditions were analyzed for the anticipated Project buildout year of 2030, which includes growth and traffic from other related projects, both with and without Project traffic. The summary of queue lengths and off-ramp storage

length, along with the analysis worksheets, are provided in the TA, which is included as Appendix J-1 of this Draft EIR.

The analysis concluded that, under Future with Project Conditions, queues at the six study off-ramps would not exceed the ramp storage length during any of the analyzed peak hours and would, therefore, not be subject to a speed differential analyses. At the following three off-ramp locations, the Project would result in additional queue lengths of 50 feet or more during one of the peak hours:

- US-101 Northbound Off-Ramp to 4th Street (AM peak hour)
- I-5 Southbound Off-Ramp to 4th Street (PM peak hour)
- I-10 Eastbound Off-ramp to Alameda Street (PM peak hour)

While queue lengths at three of the study off-ramps during either the AM or PM peak hour would be longer (i.e., more than 50 feet) with the Project, the queues at the off-ramps would not extend onto the freeway mainline and the Project would not cause a safety impact. **Therefore, the Project would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on freeway safety would be less than significant.**

## (2) Mitigation Measures

Impacts regarding geometric hazards would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Impacts regarding the geometric hazards were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

As discussed in the Initial Study (Appendix A of this Draft EIR), emergency access to the Project Site and surrounding area would be maintained both during Project construction and operation. Therefore, the Project would not result in inadequate emergency access during construction or operation. Less-than-significant impacts would occur with respect to Threshold (d). No further analysis is required.

## **e) Cumulative Impacts**

### (1) Impact Analysis

Figure III-1, *Related Projects Map*, in Chapter III, *Environmental Setting*, is an area map showing the location of the Project and related land use development projects to be evaluated under the cumulative conditions analysis. In accordance with the TAG, the cumulative analysis must include consideration of any Related Projects within 0.25 miles

of the Project Site and any transportation system improvements in the vicinity. Based primarily on information provided by LADOT and the City of Los Angeles Department of City Planning, there are 39 related projects. Table III-1, *Related Projects List*, in Chapter III, *Environmental Setting*, of this Draft EIR, shows the list of related projects and their corresponding proposed land uses.

As discussed under Threshold a), the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Each of the related projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Collectively, the Project and the related projects would add development and density in an area with robust transit accessibility and high levels of pedestrian activity. As with the Project, related projects would be expected to support, include and/or enhance pedestrian, bicycle, and/or other alternative transportation facilities, thus, increasing access to the City's multi-modal transportation network. Thus, the Project and the related projects would not preclude the City's ability to serve transportation needs as defined by the City's transportation policy framework. Therefore, the Project, in combination with the related projects, would not create inconsistencies or result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

As the Project would generate per capita and per employee VMT that are below the City's thresholds of significance resulting in a less-than-significant impact on VMT and would consequently be consistent with the 2020-2045 RTP/SCS VMT reduction goals, the Project would similarly result in a less-than-significant impact on VMT in cumulative conditions, and further analysis is not necessary.

With regard to design hazards, the Project would not result in a significant impact for local or freeway safety. The freeway safety analysis for the Project included traffic conditions for buildout year 2030, which included traffic from the related projects. Further, each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to cumulative impacts associated with hazardous design conditions would not be considerable.

**Based on the above, the Project's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts related to transportation would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Cumulative impacts on transportation 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.