IV. Environmental Impact Analysis
H. Transportation

1. Introduction

This section of the Draft EIR analyzes the Project's potential transportation impacts. This section is based on *The Bloc Residential Tower and Signage SUD Project Transportation Assessment* (Transportation Assessment)[1] prepared by Gibson Transportation Consulting, Inc. (Gibson), dated January 2023, and revised February 2024, and the Traffic Hazards Review for The Bloc Residential Tower and Signage Supplemental Use District Project (Traffic Hazards Review Letter), also prepared by Gibson, dated February 7, 2024, included as Appendices I.1 and I.2 of this Draft EIR. The Transportation Assessment follows the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) dated July 2020 (updated August 2022), 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 that, for CEQA purposes, transportation impacts be evaluated based on vehicle miles traveled (VMT) rather than level of service (LOS).

The base assumptions and technical methodologies (e.g., trip generation, study locations, analysis methodology, etc.) were identified as part of the Transportation Assessment approach and were outlined in a Memorandum of Understanding (MOU) dated February 4, 2022, which was reviewed and approved by LADOT. A copy of the MOU is included as Appendix A of the Transportation Assessment. LADOT also reviewed and approved the Transportation Assessment. A copy of LADOT's Assessment Letter for the Transportation Assessment, is included in Appendix I.3 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 that apply to the Project at the

[1] *Gibson Transportation Consulting, Inc., Transportation Assessment for The Bloc Residential Tower and Signage SUD Project, Los Angeles, California, January 2023, revised February 2024.*

federal, State, regional, and City of Los Angeles (City) 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
- Central City Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- LADOT 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 and Senate Bill 375

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

On December 11, 2008, CARB adopted its first 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: CARB'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 certain 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 specified 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. CVC 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 to 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 under CEQA for land use projects and plans in California. 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 CEQA transportation impacts. In conjunction with this update, LADOT adopted its TAG in July 2019 (last updated in August 2022), which defines the methodology for analyzing a project's transportation impacts under CEQA 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[2] or a stop along an existing high-quality transit corridor[3] should be presumed to cause a less than significant transportation impact. Projects that decrease 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

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

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

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 (July 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 current version of 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 VMT 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 frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within 0.5 mile of a major transit stop that is existing or planned. Job centers are defined as areas with significantly 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 5-percent reduction in VMT per capita, 9-percent reduction in vehicle hours traveled, and a 2-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.[4] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

(1) Safety First;

(2) World Class Infrastructure;

(3) Access for All Angelenos;

(4) Collaboration, Communication, and Informed Choices; and

(5) Clean Environments and Healthy Communities.

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

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

Street classifications are designated in the Mobility Plan, 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 connect to other streets at both ends.
  - Non-Continuous local streets lead to a dead-end.

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

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.

- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.

- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.

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

(b) Central City Community Plan

The 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 Element (Framework Element) 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 within the Central City Community Plan (Community Plan) area. The Community Plan includes the following transportation and circulation objectives that are applicable to the Project:

  – Policy 2-1.2: To maintain a safe, clean, attractive, and lively environment.

  – Policy 11-1.1: Encourage rail connections and High Occupancy Vehicle (HOV) lanes that will serve the downtown traveler.

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

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

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

  - Policy 11-7.1: Encourage transportation strategies that include parking and TDM policies and actions that increase ridesharing and give priority to visitor/shopper parking.

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

(c) Los Angeles Municipal Code

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

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

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.

LAMC Section 14.4.5 requires no sign or sign support structure be erected, constructed, painted or maintained, and no permit be issued, if a sign or sign support structure (because of its location, size, nature, or type) constitutes a hazard to the safe and efficient operation of vehicles upon a street or a freeway, or which creates a condition that endangers the safety of persons or property.

(d) LADOT Transportation Assessment Guidelines

On July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, to reflect 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 most recently 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 was developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[5]

(e) LADOT Manual of Policies and Procedures Section 321

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

[5] *Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, 2022.*

(f) LADOT Vision Zero

The Vision Zero 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 (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last updated in 2018, represents 6 percent of the City's street miles but accounts for approximately two thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

(g) LADOT 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 urban design principles set forth in the City of Los Angeles General Plan Framework (General Plan Framework) 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 General Plan Framework 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.[6] Plan for a Healthy Los Angeles

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

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

b. Existing Conditions

The Project's study area (Study Area) includes a geographic area approximately 0.25 mile from the Project Site. The existing street system and transit network in the Study Area are shown in Figure IV.H-1 and Figure IV.H-2 on pages IV.H-14 and IV.H-15.

(1) Street System

The existing street system in the Study Area consists of a regional roadway system, including arterials and local streets, that provides regional, sub-regional, and local access and circulation to the Project Site. These transportation facilities generally provide two to four travel lanes and usually allow parking on one or both sides of the street. Typically, the speed limits range between 25 and 35 miles per hour (mph) on the streets and 55 mph on the freeways surrounding downtown.

(a) Freeways

In the Study Area, primary regional access to the Project Site is provided by State Route 110 (SR-110 or the Harbor Freeway), located approximately 0.25 mile west of the Project Site.

- SR-110—SR-110 runs in the north-south direction and is located approximately 0.25 mile west of the Project Site. In the vicinity of the Project Site, SR-110 provides three travel lanes in each direction. Access to and from SR-110 is available via interchanges at 6th Street, 8th Street, and James M. Wood Boulevard within the Study Area.

(b) Roadways

The roadways adjacent to the Project Site are part of the existing urban roadway network and do not contain hazardous geometric design features, such as sharp curves or dangerous intersections. Listed below are the primary streets that provide local access to the Project Site.

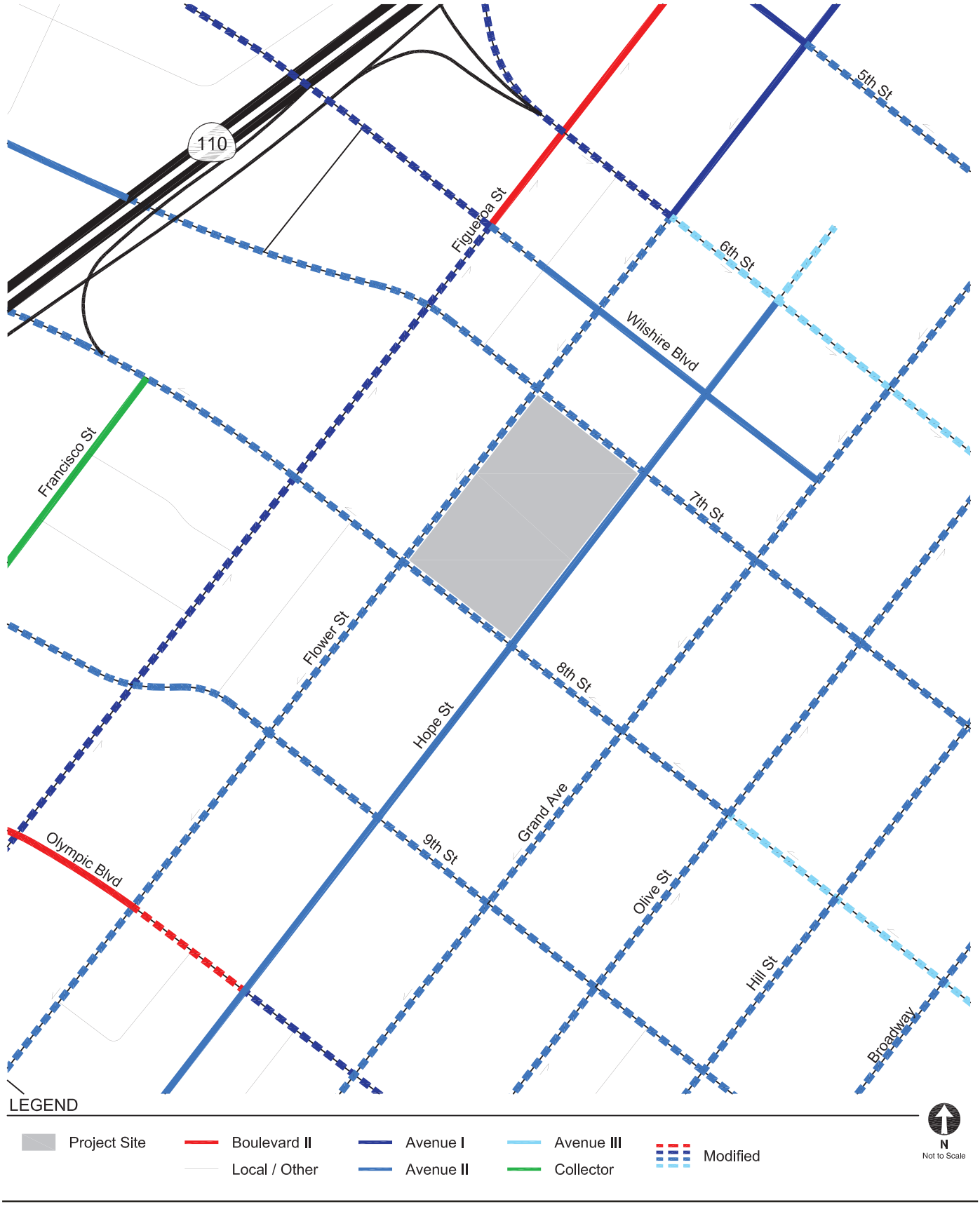

Figure IV.H-1
Existing Street System

Source: Gibson Transportation Consulting, Inc., 2024.

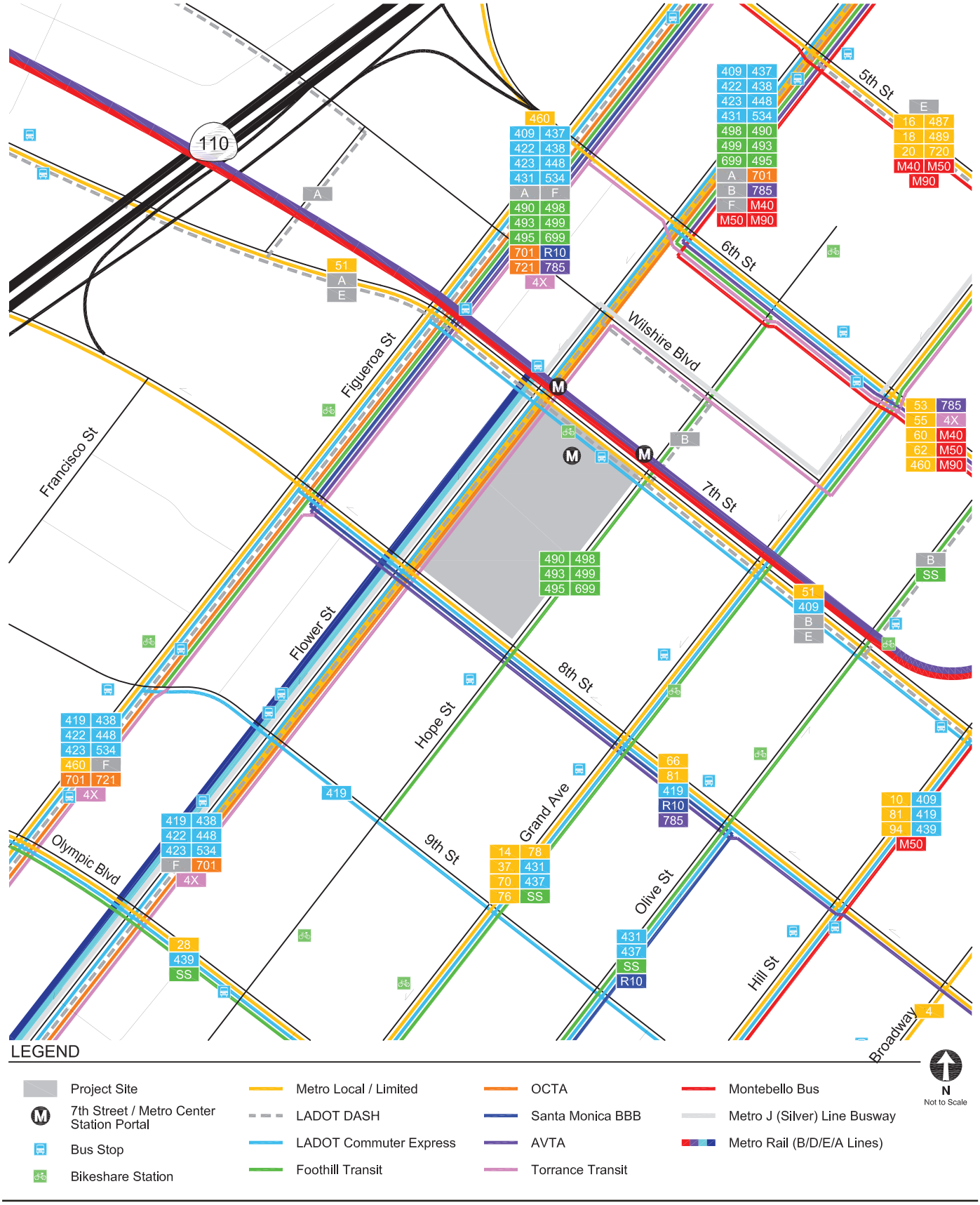

Figure IV.H-2
Existing Transit Network

Source: Gibson Transportation Consulting, Inc., 2024.

- Flower Street is a designated Modified Avenue II south of 6th Street and a designated Avenue I north of 6th Street. It generally travels one-way southbound and is located adjacent to the western boundary of the Project Site. It provides four southbound travel lanes north of 7th Street and three southbound travel lanes and a bus only lane south of 7th Street within the Study Area. Two-hour metered daytime parking is generally available on both sides of the street, with morning and afternoon peak hour restrictions on the west side of the street within the Study Area.

- Hope Street is a designated Avenue II south of 6th Street and a designated Modified Avenue II north of 6th Street.[7] It generally runs in the north-south direction and is located adjacent to the eastern boundary of the Project Site. It generally provides four travel lanes, two in each direction, with left-turn lanes at most intersections. Two-hour metered daytime parking is available north of 8th Street on the east side of the street. Two-hour metered parking is available on both sides of the street between 8th and 9th Street and south of Olympic Boulevard within the Study Area.

- 7th Street is a designated Modified Avenue II east of Francisco Street and a designated Avenue II west of the SR-110. It generally runs in an east-west direction and is located adjacent to the northern boundary of the Project Site. It generally provides one travel lane in each direction east and west of Figueroa Street and west of the SR-110, with striped bicycle lanes on both sides of the street. Daytime two-hour unmetered parking is generally available on the south side of the street between Grand Avenue and Olive Street within the Study Area.

- 8th Street is a designated Modified Avenue III east of Olive Street, a designated Modified Avenue II east of SR 110, and a designated Avenue II west of SR 110. It generally travels one-way in the eastbound direction and is located along the southern boundary of the Project Site. It generally provides four westbound travel lanes within the Study Area. Daytime two-hour metered parking is generally available on the south side of the street between Flower Street and Figueroa Street within the Project Area. Daytime four-hour metered parking is generally available on both side sides of the street with morning and afternoon peak hour restriction on the north side of the street east of Hope Street within the Study Area.

(2) Existing Bicycle and Pedestrian Facilities

(i) Pedestrian Facilities

The Project Site is located in an area with well-developed pedestrian facilities, including sidewalks on all streets and crosswalks at all intersections. There are signalized

[7] *Hope Street terminates north of 6th Street and commences north of 5th Street.*

pedestrian crossings at the four closest intersections to the Project Site (i.e., Flower Street and 7th Street, Hope Street and 7th Street, Flower Street and 8th Street, and Hope Street and 8th Street). These four intersections also provide pedestrian facilities for access to the Project Site, as well as pedestrian phasing, crosswalk striping, and ADA curb ramps. The Flower Street and 8th Street intersection provides a decorative crosswalk, and the Hope Street and 8th Street intersection provides a standard crosswalk. Pedestrian push buttons are also provided at the Flower Street and 7th Street and Hope Street and 8th Street intersections. Figure 5 and of the Transportation Assessment illustrates existing intersection mobility facilities.

(ii) Bicycle Facilities

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

The Mobility Plan consists of a Bicycle Enhanced System (Low-Stress Network) (BEN) and a Bicycle Lane Network (BLN). The BEN is a subset of and supplement to the 2010 Bicycle Plan and is comprised of a network of streets that prioritize bicyclists and provide bicycle paths and protected bicycle lanes (Class IV). Class IV protected bicycle lanes including cycle tracks, bicycle traffic signals, and demarcated areas to facilitate turns at intersections and along neighborhood streets, provide further protection from other travel lanes. These Class IV networks typically provide mini-roundabouts, cross-street stop signs, crossing islands at major intersection crossings, improved street lighting, bicycle boxes, and bicycle-only left-turn pockets. Once implemented, these facilities would offer a safer environment for both cyclists and motorists. The BLN consists of Class II bicycle lanes with striped separation.

As shown in Figure 8 of the Transportation Assessment, the Study Area includes the existing Class II Bike Lane along 7th Street (east of the SR-110); Class III Sharrow Bike Route along Broadway; Class IV Bike Lanes along Figueroa Street, Grand Avenue (south

of Wilshire Street), Olive Street (south of 7th Street), 5th Street (west of Hope Street), 7th Street (west of Figueroa Street), 6th Street (west of Hope Street).

In addition, there are nine existing Metro Bike Share stations in the Project's Study Area at the following approximate locations, as shown in Figure IV.H-2 on page IV.H-15:

- Olive Street & 8th Street;
- Olive Street & 7th Street;
- Hope Street & 6th Street;
- 8th Street & Grand Avenue;
- 7th Street & Flower Street (on-site);
- 8th Street & Figueroa Street;
- 9th Street & Figueroa Street;
- Grand Avenue & Olympic Boulevard; and
- Hope Street & Olympic Boulevard.

(3) Transit System

The Project Site is served by a number of public transit lines. The Project Site contains a portal to the Metro 7th Street/Metro Center Station, which contains the Metro A, B, D, and E Lines and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. The Project's Study Area is also served by a total of eight local and inter-city transit operators. Metro operates four rail lines, one Rapid bus lines, two Express lines, and 19 Local lines in the Study Area. Additional transit lines within the Study Area include 10 LADOT Commuter Express lines, four LADOT Downtown Area Short Hop (DASH) bus lines, seven Foothill Transit bus lines, two Orange County Transportation Authority (OCTA) bus lines, one Santa Monica Big Blue Bus (BBB) line, one Antelope Valley Transit Authority (AVTA) and one Torrance Transit bus line. Table IV.H-1 on page IV.H-19 summarizes the various transit lines providing service in the Project vicinity. Figure 9 and Table 2A and 2B of the Transportation Assessment illustrate the transit facilities and routes in the vicinity of the Project Site.

Table IV.H-1
Existing Transit Service

Provider, Route, and Service Area		Service Type	Hours of Operation	Average Headway (minutes)			
				A.M. Peak Period		P.M. Peak Period	
				NB/EB	SB/WB	NB/EB	SB/WB
Metro							
4	Downtown Los Angeles–West Los Angeles–Santa Monica via Santa Monica Boulevard	Local	24-Hour	12	10	10	11
10	Downtown Los Angeles–West Hollywood via Temple Street and Melrose Avenue	Local	4:30 A.M.–1:00 A.M.	16	15	13	17
14	Downtown Los Angeles–Beverly Hills via Beverly Boulevard	Local	5:30 A.M.–1:00 A.M.	12	11	12	11
16	Downtown Los Angeles–Century City via 3rd Street	Local	4:00 A.M.–1:30 A.M.	7	7	7	8
18	Downtown Los Angeles/Montebello–Downtown Los Angeles/Wilshire/Western Station via 6th Street and Whittier Boulevard	Local	24-Hour	8	7	7	8
20	Downtown Los Angeles–Santa Monica via Wilshire Boulevard	Local	24-Hour	15	11	14	15
28	Downtown Los Angeles–Century City via W. Olympic Boulevard	Local	4:30 A.M.–1:30 A.M.	11	10	10	10
37	Downtown Los Angeles–Washington/Fairfax Transit Hub via Adams Boulevard	Local	4:30 A.M.–1:15 A.M.	12	11	11	11
51	Westlake/MacArthur Park–CSU Dominguez Hills via San Pedro Street and Avalon Boulevard	Local	4:30 A.M.–11:00 P.M.	9	8	7	8
53	Downtown Los Angeles–CSU Dominguez Hills via Central Avenue	Local	4:30 A.M.–10:00 P.M.	11	10	11	11
55	Downtown Los Angeles–Willowbrook Station via Compton Avenue	Local	5:00 A.M.–9:30 P.M.	15	15	15	15
60	Downtown Los Angeles–Artesia Station via Long Beach Boulevard, Owl Service[a] to Downtown Long Beach	Local	24-Hour	9	8	6	7
62	Downtown Los Angeles–Hawaiian Gardens via Telegraph Road	Local	5:00 A.M.–12:00 A.M.	60	34	30	48
66	Wilshire Center–Downtown Los Angeles–Montebello via 8th Street and Olympic Boulevard	Local	4:30 A.M.–1:30 A.M.	10	11	10	10
70	Downtown Los Angeles–El Monte via Garvey Avenue	Local	24-Hour	10	10	9	10
76	Downtown Los Angeles–El Monte via Valley Boulevard	Local	24-Hour	20	20	22	20

Table IV.H-1 (Continued)
Existing Transit Service

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (minutes)			
			A.M. Peak Period		P.M. Peak Period	
			NB/EB	SB/WB	NB/EB	SB/WB
78 Downtown Los Angeles–Temple City via Las Tunas Drive & Mission Road	Local	4:00 A.M.–1:30 A.M.	12	13	12	11
81 Eagle Rock–Downtown Los Angeles–Harbor Freeway Station via Figueroa Street	Local	24-Hour	22	27	20	20
94 Downtown Los Angeles–North Hollywood Station via San Fernando Road	Local	4:30 A.M.–2:00 A.M.	15	17	17	15
460 Downtown Los Angeles–Disneyland via Harbor Transitway & I-105 Freeway	Express	4:00 A.M.–2:00 A.M.	34	27	24	34
487–489 Downtown Los Angeles–Sierra Madre Villa Station–El Monte Station	Express	5:30 A.M.–9:30 P.M.	40	24	22	40
720 LA/Commerce–Santa Monica via Wilshire and Whittier Boulevard	Rapid	6:00 A.M.–2:30 A.M.	6	6	6	6
Metro Rail						
B Downtown Los Angeles–North Hollywood	Rail	4:30 A.M.–2:00 A.M.	15	15	15	15
D Downtown Los Angeles–Koreatown	Rail	4:30 A.M.–2:00 A.M.	15	15	15	15
A Downtown Los Angeles–Long Beach	Rail	4:30 A.M.–1:00 A.M.	8	8	9	10
E Downtown Los Angeles–Santa Monica	Rail	4:00 A.M.–1:00 A.M.	10	9	9	9
Metro Transitway						
Silver Harbor Gateway Transit Center–El Monte	BRT	4:00 A.M.–1:30 A.M.	8	8	8	9
LADOT DASH						
A Little Tokyo–City West	Local	6:00 A.M.–9:00 P.M.	7	7	7	7
B Chinatown–Financial District	Local	6:00 A.M.–9:00 P.M.	8	8	8	8
E Westlake/MacArthur Park–Fashion District	Local	6:00 A.M.–9:00 P.M.	5	5	5	5
F Financial District–Exposition Park	Local	6:00 A.M.–9:00 P.M.	10	10	10	10

Table IV.H-1 (Continued)
Existing Transit Service

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (minutes)			
			A.M. Peak Period		P.M. Peak Period	
			NB/EB	SB/WB	NB/EB	SB/WB
LADOT Commuter Express						
409 Montrose–Tujunga–Sunland–Lake View Terrace–Glendale–Downtown Los Angeles	Express	6:00 A.M.–7:30 P.M.	N/A	19	26	N/A
419 Chatsworth–Northridge–Granada Hills–Mission Hills–Downtown Los Angeles	Express	5:30 A.M.–8:30 P.M.	N/A	17	26	N/A
422 Hollywood–San Fernando Valley–Agoura Hills–Thousand Oaks–Downtown Los Angeles	Express	4:30 A.M.–8:30 P.M.	N/A	30	27	N/A
423 Thousand Oaks–Agoura Hills–Woodland Hills–LADOT Encino Park & Ride–Downtown Los Angeles	Express	6:00 A.M.–9:00 A.M.; 3:00 P.M.–8:00 P.M.	N/A	17	18	N/A
431 Westwood–Palms–Downtown Los Angeles	Express	6:30 A.M.–7:30 P.M.	N/A	38	45	N/A
437 Venice–Marina Del Rey–Mar Vista–Culver City–Downtown Los Angeles	Express	6:00 A.M.–7:00 P.M.	N/A	30	30	N/A
438 Redondo Beach–Hermosa Beach–Manhattan Beach–El Segundo–Downtown Los Angeles	Express	5:30 A.M.–7:30 P.M.	N/A	13	16	N/A
439 El Segundo–Downtown Los Angeles	Express	6:00 A.M.–7:30 P.M.	N/A	45	45	N/A
448 Rancho Palos Verdes–Rolling Hills Estates–Harbor City	Express	5:30 A.M.–7:00 P.M.	N/A	19	15	N/A
534 Westwood–Century City–West Los Angeles–Downtown Los Angeles	Express	7:00 A.M.–6:30 P.M.	N/A	30	30	N/A
Foothill Transit						
490 Grand Ave. Park & Ride–Covina Transit Center–Downtown Los Angeles	Express	4:30 A.M.–9:30 P.M.	N/A	20	18	N/A
493 Diamond Bar–Rowland Heights–Downtown Los Angeles	Express	4:30 A.M.–8:30 P.M.	N/A	15	16	N/A
495 Industry Park & Ride–Rowland Heights–Downtown Los Angeles	Express	5:00 A.M.–7:45 P.M.	N/A	20	24	N/A
498 Azusa–West Covina–Downtown Los Angeles	Express	4:30 A.M.–8:00 P.M.	N/A	22	20	N/A
499 San Dimas Park & Ride–Via Verde Park & Ride–Los Angeles	Express	5:00 A.M.–8:00 P.M.	N/A	24	27	N/A

Table IV.H-1 (Continued)
Existing Transit Service

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (minutes)			
			A.M. Peak Period		P.M. Peak Period	
			NB/EB	SB/WB	NB/EB	SB/WB
699 Montclair–Fairplex Park & Ride–Cal State LA–USC Medical Center–Downtown Los Angeles	Express	4:00 A.M.–8:00 P.M.	N/A	17	17	N/A
SS Silver Streak–Montclair–Downtown Los Angeles	Express	24-Hour	20	16	18	15
OCTA						
701 Huntington Beach–Los Angeles	Express	5:30 A.M.–7:00 P.M.	60	N/A	N/A	60
721 Fullerton–Los Angeles	Express	5:00 A.M.–7:30 P.M.	36	N/A	N/A	36
Santa Monica Big Blue Bus						
R10 Santa Monica–Downtown Los Angeles	Rapid	5:30 A.M.–9:30 P.M.	18	N/A	N/A	15
Antelope Valley Transit Authority						
785 Palmdale/Lancaster–Downtown Los Angeles	Express	5:00 A.M.–8:00 P.M.	26	N/A	N/A	23
Torrance Transit						
4X Torrance–Downtown Los Angeles	Express	5:00 A.M.–8:00 P.M.	30	N/A	N/A	30
Montebello Bus Lines						
M40 Montebello–Whittier–Downtown Los Angeles	Express	4:45 A.M.–11:00 P.M.	17	18	18	17
M50 La Mirada–Downtown Los Angeles	Express	4:30 A.M.–11:15 P.M.	36	48	60	60
M90 Montebello–Whittier–Downtown Los Angeles	Express	8:00 A.M.–5:00 P.M.	36	60	36	36

DASH = Los Angeles Department of Transportation Downtown Area Short Hop
Express = Los Angeles Department of Transportation Commuter Express
Metro = Los Angeles County Metropolitan Transportation Authority
OCTA = Orange County Transportation Authority

Table IV.H-1 (Continued)
Existing Transit Service

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (minutes)			
			A.M. Peak Period		P.M. Peak Period	
			NB/EB	SB/WB	NB/EB	SB/WB
Santa Monica Big Blue Bus = City of Santa Monica Big Blue Bus						
Torrance Transit = City of Torrance Transit Department						
The A.M. peak is from 6 A.M. to 10 A.M.						
The P.M. peak is from 3 P.M. to 7 P.M.						
[a] *Metro's Owl Service operates during the nighttime hours (12 A.M. to 5 A.M.).*						
Source: Gibson Transportation Consulting, Inc., 2024.						

(4) High Injury Network Facilities

As shown in Figure 8 of the Transportation Assessment, the following streets located adjacent to the Project Site have been identified in the LADOT HIN: 7th Street and 8th Street. Furthermore, within the Study Area, the following streets are also identified in the LADOT HIN: Figueroa Street, 5th Street east of Figueroa Street, 6th Street, 9th Street, Olympic Boulevard, and Wilshire Boulevard.

In order to realize the goals and objectives of the Vision Zero Program, LADOT has initiated a number of projects along various street corridors. These projects generally involve improvements to the streets, bicycle facilities, and pedestrian facilities such as installation or upgrading of crosswalks, traffic signals, and bicycle lanes to prevent deaths and severe injuries. There are currently no improvement projects planned on any of the nearby streets on the High Injury Network.[8]

(5) Existing Parking and Site Access

The existing parking structure currently provides 1,971 parking spaces, which are used for the existing commercial and hotel uses on the Project Site. As shown in Figure II-11 in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site is provided via existing ingress/egress driveways along Hope Street, 8th Street, and Flower Street. Primary vehicle access is provided via two ingress/egress driveways along Flower and Hope Streets. Additionally, along 8th Street there is one ingress driveway and one egress driveway, as well as a separate driveway located mid-block along 8th Street which is designated for delivery vehicles to access the subterranean loading area. The hotel's porte-cochere, which provides a pick-up/drop-off area and valet parking for hotel guests, is located mid-block along Hope Street.

c. Future Cumulative Transportation Conditions

The Transportation Assessment incorporates a list of related projects compiled based on information obtained from the Department of City Planning and LADOT, as well as recent studies of projects in the area. A total of 44 related development projects were identified in the vicinity of the Project Site, as shown in Figure III-1 and listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. These related projects are projects that are located within an approximately 0.5-mile radius from the Project Site. Although the buildout years of many of these related projects are uncertain and may well be beyond the Project's buildout year, and notwithstanding that some may not be approved or developed,

[8] *City of Los Angeles, City of Los Angeles GeoHub, High Injury Network Projects Map, https://ladotlivablestreets.org/programs/vision-zero/maps, accessed January 27, 2023.*

all related projects were considered. Therefore, the projected traffic growth as a result of the related projects is a conservative estimate.

The transportation network within the Study Area could be affected by regional improvement plans, local specific plans, and programmed improvements implemented prior to full occupancy of the Project. Therefore, the analysis of Future Conditions accounts for roadway improvements that have been funded and are expected to be implemented prior to full occupancy of the proposed Project, as appropriate. Other proposed roadways improvement projects that are not funded and traffic/trip reduction strategies, such as TDM programs for individual buildings and developments were omitted from the Future Conditions analysis. The anticipated improvements are shown in Figure 14 of the Transportation Assessment and described below:

- Metro Regional Connector: The Metro Regional Connector project is a 1.90-mile underground light rail system that will extend from the Metro Gold Line Little Tokyo/Arts District Station to the 7th Street/Metro Center Station, allowing passengers to make direct transfers between the A, E, B, and D Lines. The Metro Regional Connector will improve access to both local and regional destinations by providing continuous service between these lines and providing connectors to other rail lines via the 7th Street/Metro Center Station. Based on recent information provided on the Metro website, the Metro Regional Connector is anticipated to be completed and in operation in Year 2023.[9] The Metro Regional Connector will be underground and will not affect the at-grade street configurations of the corridors in the Study Area. No changes to the street network were made based on this project.

- Los Angeles Streetcar: The Los Angeles Streetcar project will revive the historic streetcar service that once spanned 600 miles of the City in the early 20th Century. The proposed approximately 4-mile route of the project will closely follow the alignments that originally ran through Downtown. The Los Angeles Streetcar will enhance mobility and transit circulation and support the growth and revitalization of Downtown. The Los Angeles Streetcar is anticipated to begin operation in 2025. However, as the design of the Los Angeles Streetcar has not been finalized, it remains speculative and was not included in the future year analyses.

- Mobility Plan: In the Mobility Plan, the City identifies key corridors as components of various "mobility-enhanced networks." Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements that

[9] *Metro, Regional Connector Transit Project, www.metro.net/projects/connector-2/#:~:text=Status,some%20of%20the%20station%20artworks, accessed March 31, 2023.*

may be implemented in those networks have not yet been identified, and there is no schedule for implementation; therefore, no changes to vehicular lane configurations were made to Future Conditions as a result of the Mobility Plan. However, the following mobility-enhanced networks include corridors within or near the Study Area and are depicted in Figure 14 of the Transportation Assessment.

- TEN: The TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. The TEN has designated 6th Street, 5th Street and Figueroa Street south of 6th Street within the Study Area as part of the network.

- NEN: The NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. The NEN has designated Hill Street and Hope Street south of 5th Street within the Study Area as part of the network.

- BEN/BLN: Within the Project Area, 7th Street, Figueroa Street south of 7th Street, Grand Avenue south of Wilshire Boulevard, and Olive Street south of 7th Street have been designated as part of the BEN. Figueroa Street north of 7th Street, Hill Street south of 5th Street, and Flower Street have been designated as part of the BLN within the Study Area.

- PED: The Mobility Plan aims to promote walking to reduce the reliance on automobile travel by providing more attractive and pedestrian-friendly sidewalks, as well as adding pedestrian signalizations, street trees, and pedestrian-oriented design features. All streets within the Study Area are included as part of the PED.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access.

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

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018, and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines Update*, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The *CEQA Transportation Analysis Guidelines Update* establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG. The analysis in this section and the Transportation Assessment, included as Appendix I.1 of this Draft EIR, uses the version of the TAG updated by LADOT in August 2022.

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

CEQA Guidelines Transportation Threshold (a) requires an analysis of the Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below evaluates the Project's potential to conflict with the applicable transportation plans, programs, ordinances, and policies listed in Subsection IV.H.2.a, Regulatory Framework, above. In accordance with the City's TAG, a project that generally conforms with, and does not obstruct, the City's development policies and standards would generally be considered to not conflict with such plans and standards.

As discussed in the Transportation Assessment, a project would not be shown to result in an impact merely based on whether a project would not implement an adopted plan, program, ordinance or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies. Furthermore, under CEQA, a project is considered to not conflict with an applicable plan if it would not conflict

with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

(3) Vehicle Miles Traveled

(a) VMT Impact Thresholds

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds.[10] The TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the State's goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted the TAG in July 2019 and adopted the last update in August 2022.

The City's VMT impact criteria for development projects is specified in Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG. Per the criteria, a development project would have a potential significant impact if the project meets one or more of the following:

- For residential projects, a development project may have a potential significant impact if it generates household VMT per capita exceeding 15 percent below the

[10] *OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.*

existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. The Project is located in the Central APC, and the corresponding threshold is 6.0 daily VMT per capita.

- For commercial projects, a development project may have a potential significant impact if it generates work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located. The Project is located in the Central APC, and the corresponding threshold is 7.6 daily VMT per employee.

Per the TAG, a project could have a significant cumulative impact on VMT if the project has both a significant project-level impact as determined above and is not consistent with the 2020–2045 RTP/SCS in terms of development location, density, and intensity.

(b) VMT Analysis Methodology

LADOT prepared a tool (VMT Calculator) designed to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The VMT Calculator (Version 1.3, released July 2020) accounts for a variety of sociodemographic, land use, and built environment factors estimated for each census tract within the City, as well as the interaction of land uses within a mixed-use development. Some of the key factors built into the VMT Calculator include travel behavior zones, mixed-use development methodology, population and employment assumptions, and TDM measures.

(i) Travel Behavior Zone

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 VMT Calculator Documentation, the development of the TBZs considered the population density, land use diversity, intersection density, and distance to nearest transit within each Census tract. TBZs are categorized as follows:

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

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

(ii) Travel Demand Forecasting

The VMT Calculator determines a project's VMT based on the trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the project's VMT.

(iii) Population and Employment Assumptions

The VMT Calculator contains population assumptions based on Census data and employment assumptions derived from multiple data sources, including the *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* (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling resources. A summary of the population and employment assumptions for various land uses is provided in Table 1 of the *City of Los Angeles VMT Calculator Documentation (LADOT and Los Angeles Department of City Planning, May 2020).*

(iv) Transportation Demand Management Strategies

The VMT Calculator also measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures. As discussed in City of Los Angeles VMT Calculator Documentation, the following seven categories of TDM strategies are included in the VMT Calculator:

- **Parking**—Reducing, unbundling, permitting, pricing parking.
- **Transit**—Transit subsidies, reduced headways, neighborhood shuttles.
- **Education and Encouragement**—Travel behavior change program, promotions, and marketing.
- **Commute Trip Reductions**—Required commute trip reduction program, vanpool, ride-share.
- **Shared Mobility**—Car-share, bike share, school carpool program.
- **Bicycle Infrastructure**—On-street bike facilities, bike parking, bike facilities, showers.
- **Neighborhood Enhancement**—Traffic calming, pedestrian network improvements.

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented by the California Air Pollution Control Officers Association in the report *Quantifying Greenhouse Gas Mitigation Measures*.[11]

(4) Hazardous Design Features

(a) Geometric Design Feature and Incompatible Uses Analysis

TAG Threshold T-3 requires that the determination of significance should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design), while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions like curves or grade changes, and a project's proximity to streets identified in the HIN or the Safe Routes to School program. Significance may be determined qualitatively or quantitatively as best suits the circumstances of each project. If a significant impact is identified, mitigation measures may include installation of new traffic control devices, redesign or relocation of access points, turn restrictions, pavement markings, or vehicular demand management.

(b) Freeway Safety Analysis

As discussed above, the TAG provides guidance on freeway safety analysis for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted 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. This analysis is included as part of this threshold.

If a project adds 25 or more trips to any off-ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queuing impacts. If a project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramp, then a freeway ramp analysis is not required.

If a freeway ramp analysis is required, the interim guidance provides the following steps to determine if a project may constitute a potential safety impact under CEQA:

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

- For the identified freeway off-ramps, prepare a queuing study for the "Future with Project" conditions for the proposed project build-out year. Evaluate the adequacy of the existing and future storage lengths with the 95th percentile queue and 100 percent of the storage length on each lane of the ramp from the stop line to the gore point. When an auxiliary lane is present, add 50 percent of the length of the auxiliary lane to the ramp storage area.

- If the proposed project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the proposed project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the addition of traffic generated by the proposed project would increase the overflow onto the mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact.

- If a proposed project adds two or more car lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact. If the speed differential is 30 mph or more, then there is a potential safety issue. The Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data including location-based services data from available sources could be used.

- If the speed differential is 30 mph or more, which may result in a potential safety issue, the guidance suggests a proposed project should consider the following preferred corrective measures to offset a potential safety issue:

  – Transportation demand management program(s) to reduce the project's trip generation,

  – Investments to active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's trip generation, and/or

  – Potential operational change(s) to the ramp terminal operations including, but not limited to, lane reassignment, traffic signalization, signal phasing or timing modifications, etc. This option requires coordination with Caltrans and LADOT to assess feasibility and for approval of the proposed measure(s).

A physical change to the ramp itself (addition of auxiliary lane, ramp widening, etc.) may be considered. However, this change would have to demonstrate substantial safety benefits, not be a VMT-inducing improvement, and not result in other environmental issues.

If the cost of the physical change to the ramp is substantial, then a fair-share contribution to the improvement may be required if necessary requirements are met, including, but not limited to, Caltrans defining the improvement cost, and opening a Project File/Project Account to accept a financial contribution for the improvement.

(5) Emergency Access

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

c. Project Design Features

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

Project Design Feature TR-PDF-1: A detailed Construction Traffic Management Plan (CTMP), including haul routes and staging plan, will be prepared and submitted to LADOT for review and approval prior to commencing construction for the new building. The CTMP will formalize how Project construction will be carried out and identify specific actions that will reduce effects on the surrounding community. The CTMP 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 measures:

- 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;
- A Traffic Control Plan formalizing the planning and scheduling of construction activities and identifying specific actions that will be undertaken to facilitate the flow of traffic on surrounding streets during construction. The Traffic Control Plan will be submitted to LADOT for review and approval prior to the issuance of demolition and grading permits for the new building;

- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries, to the extent feasible;
- 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 to the extent feasible;
- 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.

Project Design Feature TR-PDF-2: Prior to issuance of a certificate of occupancy for the new building, the Project will install vehicle signalized alert systems at all four existing parking garage driveways.

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

Table 2.1-2 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following have been assessed for the Project: Mobility Plan 2035; Plan for a Healthy Los Angeles; Central City Community Plan; Draft Downtown Los Angeles Community Plan; LAMC; LADOT Vision Zero; and Citywide Design Guidelines. The Project's potential to conflict with these programs, plans, ordinances, and policies, and with SCAG's 2020-2045 RTP/SCS, is analyzed below.

(a) Mobility Plan 2035

The Mobility Plan combines "complete street" principles with the following primary goals that define the City's mobility priorities:

- **Safety First:** Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.
- **World Class Infrastructure:** A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
- **Access for All Angelenos:** A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
- **Collaboration, Communication, and Informed Choices:** The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
- **Clean Environments and Healthy Communities:** Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

A detailed analysis of the Project's consistency with the applicable transportation-related policies of the Mobility Plan, which are organized according to the above primary goals, is provided in Table IV.H-2 on page IV.H-36.

(b) Plan for a Healthy Los Angeles

As indicated previously in the Regulatory Framework subsection above, the Plan for a Healthy Los Angeles introduces guidelines for the City to follow to enhance its position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.

A detailed analysis of the Project's consistency with the transportation-related policies in the *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan* is provided in Table IV.H-3 on page IV.H-42.

Table IV.H-2
Project Consistency With the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
Chapter 1: Safety First	
Policy 1.1 Roadway User Vulnerability: Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.	**No Conflict.** While this policy generally applies to City streets and not to development projects, the Project would support and would not preclude its implementation. Specifically, the Project design includes pedestrian enhancements, including enhanced sidewalk paving, five new replacement street trees in landscape tree wells, and short-term bicycle parking within a 190-foot portion of Hope Street. The Project would maintain existing pedestrian and bicycle access available to the Project Site and would provide new pedestrian and bicycle access to the residential tower via the new residential lobby entrance along Hope Street. Existing mirrors at the driveways would remain and would continue to make drivers aware of approaching pedestrians. The Project is requesting waivers of dedication and improvement along all Project Site frontages, pursuant to LAMC Section 17.03 and 17.15 because the existing buildings on the Project Site preclude such dedication and improvements; however, the Project would maintain the existing sidewalk width along all Project frontages, would continue to provide safe access for all users regardless of mode of choice, and would not conflict with the Safety First objective of the Mobility Plan. Further, the Project does not propose modifying, removing, or otherwise affecting any existing off-site bicycle infrastructure or existing Project driveways, which are not located along a street with an existing bicycle facility. Additionally, pursuant to Project Design Feature TR-PDF-2, prior to issuance of a certificate of occupancy for the new building, the Project would provide for the installation of signalized alert systems at all four existing parking garage driveways, to warn pedestrians of vehicle traffic exiting the Project driveways. Therefore, the Project would not conflict with Mobility Plan Policy 1.1.
Chapter 2: World Class Infrastructure	
Policy 2.2 Complete Streets Design Guide: Establish the Complete Streets Design Guide as the City's document to guide the operations and design of streets and other public rights-of-way.	**No Conflict.** The Project would conform to all design element requirements regarding public rights-of-way, improved lighting elements, and landscaping design to ensure that the Project does not hinder sight distance, mobility, or accessibility. Therefore, the Project would not conflict with Mobility Plan Policy 2.2.
Policy 2.3 Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** The Project would retain all existing sidewalks that are part of the public rights-of-way, adjacent to the Project Site, with some improvements to enhance the pedestrian experience. The Project would encourage walking and enhance pedestrian activity on and around the Project Site by introducing a new residential entrance, as well as a new storefront for relocated retail space and a relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the

Table IV.H-2 (Continued)
Project Consistency With the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
	existing podium building. The Project would also include enhanced sidewalk paving and five new replacement street trees in landscape tree wells within a 190-foot portion of Hope Street, adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment. The Project would maintain all sidewalks adjacent to all public rights-of-way and all other existing pedestrian access points to the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.
Policy 2.4 Neighborhood Enhanced Network: Provide a slow speed network of locally serving streets.	**No Conflict.** Hope Street adjacent to the Project Site is part of the NEN.[a] The Project would develop residential uses near local serving retail uses and improve the pedestrian experience along Hope Street. Existing mirrors at the driveways would remain and would continue to make drivers aware of approaching pedestrians. Additionally, pursuant to Project Design Feature TR-PDF-2, the Project would provide for the installation of signalized alert systems at all four existing driveways, to warn pedestrians and bicyclists of vehicles exiting the Project driveways. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.
Policy 2.5 Transit Network: Improve the performance and reliability of existing and future bus service.	**No Conflict.** The streets adjacent to the Project Site are not part of the TEN.[b] No access to the Project Site would be provided along street segments identified in the TEN, and, thus, the Project would not interfere with future improvements to existing and future transit services. The Project would encourage more transit usage by developing residential uses within an existing mixed-use site with convenient access to both rail and bus transit services, including a portal to the Metro 7th Street/Metro Center Station. Therefore, the Project would not cause the capacity of the transit system to be substantially exceeded, and, as such, the Project would not conflict with Mobility Plan Policy 2.5.
Policy 2.6 Bicycle Networks: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities (includes scooters, skateboards, rollerblades, etc.).	**No Conflict.** There are currently Class II bicycle lanes on 7th Street adjacent to the Project Site. The Mobility Plan designates Flower Street as part of the BLN adjacent to the Project Site; however, there is currently no schedule for implementation of bicycle improvements. Nevertheless, the Project would not interfere with future implementation of the bicycle infrastructure. The Project would provide bicycle parking within and adjacent to the Project Site to encourage bicycling for residents and visitors to the Project Site. The Project would meet the required bicycle space supply. Bicycle parking requirements per LAMC Section 12.21 A,16 include short-term and long-term bicycle parking. The Project would comply with the LAMC and would provide 22 short-term and 192 long-term bicycle parking spaces. Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

Table IV.H-2 (Continued)
Project Consistency With the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
Policy 2.10 Loading Areas: Facilitate the provision of adequate on and off-street loading areas.	**No Conflict.** The Project Site would maintain the existing truck delivery area on-site accessed via 8th Street, as well as a loading space located in the lowest basement level (Level B) of the existing parking/retail podium building. The existing loading areas meet The Bloc's loading needs without disrupting operations within the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.
Policy 2.16 Scenic Highways: Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway.	**No Conflict.** The Project Site is not located adjacent to any scenic highway. The Project does not propose modifications to any scenic highway and would not impact the characteristics of a scenic highway. Therefore, the Project would not conflict with Mobility Plan Policy 2.16.
Policy 2.17 Street Widenings: Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.	**No Conflict.** The Project does not propose modifications to widen any streets. Therefore, the Project would not conflict with Mobility Plan Policy 2.17.
Chapter 3: Access for All Angelenos	
Policy 3.1 Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	**No Conflict.** The Project would recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes, as integral components of the City's transportation system by providing safe and accessible pedestrian, bicycle, and vehicular access. Specifically, the Project would support residents and visitors, who choose to travel by automobile, through the maintenance of existing vehicular access points along 8th Street, Flower Street, and Hope Street and the provision of adequate parking supply to serve demand. The Project would encourage transit usage by developing a high-density residential project adjacent to a pedestrian portal to the Metro 7th Street/Metro Center Station. In addition, the Project Site is located near several other transit options provided by Metro, LADOT DASH, LADOT's CE, AVTA, Santa Monica BBB, Foothill Transit, OCTA, Montebello Bus Lines, and Torrance Transit. The Project would maintain existing pedestrian connections to transit opportunities and would provide 214 bicycle parking stalls (22 short-term and 192 long-term spaces) on-site to encourage non-motorized transportation. Therefore, the Project would not conflict with Mobility Plan Policy 3.1.
Policy 3.2 People with Disabilities: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** As previously discussed, the existing driveways would not be modified. Project development (which includes a 190-foot length mid-block sidewalk replacement in front of the Project's proposed residential tower, and excludes existing sidewalks on other portions of this block) would comply with the applicable LADOT

Table IV.H-2 (Continued)
Project Consistency With the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
	standards and applicable requirements of the Americans with Disabilities Act (ADA), and would provide an accessible route connecting to existing pedestrian amenities at the east and west ends of the Project Development's new sidewalk. '. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.
Policy 3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No Conflict.** The Project would provide high-density residential uses located in proximity to existing jobs (including those that may be offered on-site), retail and commercial uses, destinations, and other neighborhood services. The Project would also be developed on a site with a direct portal to the Metro 7th Street/Metro Center Station, which is considered a hub of the regional rail network and would encourage the use of alternative mobility modes. Additionally, the Project design would include TDM measures, including short- and long-term bicycle parking, to reduce the number of single occupancy vehicle trips to the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 3.3.
Policy 3.4 Transit Services: Provide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services.	**No Conflict.** The Project Site is located adjacent to the Metro 7th Street/Metro Center Station and several other transit options provided by Metro, LADOT DASH, LADOT's CE, AVTA, Santa Monica BBB, Foothill Transit, OCTA, Montebello Bus Lines, and Torrance Transit, thereby providing residents and visitors to the Project Site with multiple public transit services. Access to adjacent transit would be maintained with safe and convenient paths of travel from the Project Site through the existing pedestrian portal to the Metro 7th Street/Metro Center Station in the Project Site's plaza. Therefore, the Project would not conflict with Mobility Plan Policy 3.4.
Policy 3.5 Multi-Modal Features: Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	**No Conflict.** The Project would support "first-mile, last-mile solutions" by developing a high-density residential project located in an active downtown area adjacent to multiple Metro bus stops and the Metro 7th Street/Metro Center Station portal on-site, with multiple pedestrian connections linking the Project Site to surrounding public sidewalks. Additionally, the Project design would include TDM measures that would encourage the use of transit and other alternative modes of transportation. Therefore, the Project would not conflict with Mobility Plan Policy 3.5.
Policy 3.6 Regional Transportation and Union Station: Continue to promote Union Station as the major regional transportation hub linking Amtrak, Metrolink, Metro Rail, and high-speed rail service.	**No Conflict.** The Project Site is located adjacent to the Metro 7th Street/Metro Center Station (directly accessed through a pedestrian portal in the Project Site's retail plaza), which provides a direct connection to Union Station. Therefore, the Project would not conflict with Mobility Plan Policy 3.6.
Policy 3.7 Regional Transit Connections: Improve transit access and service to major regional destinations, job centers, and inter-	**No Conflict.** The Project would improve transit access and service to major destinations and employment centers by developing high-density residential uses located in downtown

Table IV.H-2 (Continued)
Project Consistency With the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
modal facilities.	Los Angeles adjacent to the Metro 7th Street/Metro Center Station and several other transit options provided by Metro, LADOT DASH, LADOT's CE, AVTA, Santa Monica BBB, Foothill Transit, OCTA, Montebello Bus Lines, and Torrance Transit along Flower Street and Hope Street. Therefore, the Project would not conflict with Mobility Plan Policy 3.7.
Policy 3.8 Bicycle Parking: Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	**No Conflict.** The Project would provide infrastructure and services to encourage bicycling for residents and visitors to the Project Site, including the required amount of on-site bicycle parking spaces, multiple pedestrian/bicyclist connections to the public streets and sidewalks, and access to a Class IV Protected Bike Lane along 7th Street as well as several nearby bikeshare stations. Therefore, the Project would not conflict with Mobility Plan Policy 3.8.
Chapter 4: Collaboration, Communication, & Informed Choices	
Policy 4.8 Transportation Demand Management Strategies: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** The Project design would include TDM measures to reduce the number of single occupancy vehicle trips to the new residential development, including a reduced vehicle parking supply and short- and long-term bicycle parking per LAMC requirements and a reduced vehicle parking supply. Therefore, the Project would not conflict with Mobility Plan Policy 4.8.
Policy 4.13 Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** As discussed in Section II, Project Description, of this Draft EIR, the Project is not required to provide any parking for residential or commercial uses. As such, the Project would provide off-street parking sufficient to accommodate Project parking demand but reduced as compared to current LAMC requirements. The applicant has invoked Assembly Bill 2097 which prohibits the City of Los Angeles from imposing a minimum automobile parking requirement on the Project's proposed 466 residential units and the existing to remain commercial uses. The Project would also maintain existing on-street parking around the Project Site's street frontages. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.1 Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health.	**No Conflict.** The Project would provide secured bicycle parking facilities and pedestrian connections to the Metro 7th Street/Metro Center Station within the Project Site and connecting to off-site pedestrian facilities. This would promote active transportation modes, such as biking and walking. Additionally, the Project would be located adjacent to the Metro 7th Street/Metro Center Station, which is accessible via the portal located in the Project Site's plaza and adjacent to several other transit options along Flower Street and Hope Street, providing residents and visitors to the Project Site with diverse public transportation alternatives. Therefore, the Project would not conflict with Mobility Plan Policy 5.1.

Table IV.H-2 (Continued)
Project Consistency With the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
Policy 5.2 Vehicle Miles Traveled (VMT): Support ways to reduce vehicle miles traveled (VMT) per capita.	**No Conflict.** The Project is estimated to generate lower VMT per capita for residents than the average for the area, as demonstrated in the analysis for Threshold (b) below. Additionally, the Project would incorporate design features, which include TDM measures, to reduce the number of single occupancy vehicle trips to the Project Site by providing a reduced vehicle parking supply and bicycle parking per LAMC (including short-term and long-term parking facilities) and a reduced vehicle parking supply as compared to current LAMC requirements. Therefore, the Project would not conflict with Mobility Plan Policy 5.2.

[a] *LADOT Livable Streets, Maps, Neighborhoods, Networks, and Zones, Mobility Plan 2035: Neighborhood Enhanced Network, https://ladotlivablestreets.org/overall-map/maps, accessed October 4, 2022.*

[b] *LADOT Livable Streets, Maps, Neighborhoods, Networks, and Zones, Mobility Plan 2035: Neighborhood Enhanced Network, https://ladotlivablestreets.org/overall-map/maps, accessed October 4, 2022.*

Source: Gibson Transportation Consulting, Inc., 2024.

(c) Central City Community Plan

As discussed previously in the Regulatory Framework subsection above, the City's General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles. The Project Site is located within the Financial Core portion of Central City Community Plan. As such, a detailed analysis of the Project's consistency with the applicable transportation-related policies of the Central City Community Plan is provided in Table IV.H-4 on page IV.H-43.

(d) Draft Downtown Los Angeles Community Plan

The Draft Downtown Los Angeles Community Plan is currently a draft document undergoing refinement and review and has not been adopted. Thus, the information provided herein is for informational purposes only. A detailed analysis of the Project's consistency with Draft Downtown Los Angeles Community Plan is provided in Table 8 of the Transportation Assessment. The purpose of the Draft Downtown Los Angeles Community Plan is to create and implement a vision of the future for downtown. According to regional projections, by Year 2040, downtown will be adding approximately 125,000 people, 70,000 housing units, and 55,000 jobs. Per the Draft Downtown Los Angeles Community Plan, the following "core principles" represent the long-term priorities of the plan:

Table IV.H-3
Project Consistency with Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
Chapter 1—Los Angeles, a Leader in Health and Equity	
Policy 1.5 Plan for Health Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	**Consistent.** The Project would enhance pedestrian access with a new pedestrian entrance to the new residential lobby along Hope Street, as well as a relocated and enhanced pedestrian entrance to the Project Site from Hope Street. The Project would include new private residential open space and recreational amenities for residents, and the Project Site (outside the Development Area) contains existing open space accessible to the public that is not part of the Project. Further, the Project provides bicycle parking facilities to encourage bicycling for residents and visitors to the Project Site. As such, it would encourage the use of active travel modes and thereby promote healthy living.
Chapter 2—A City Built for Health	
Policy 2.8 Basic Amenities Promote increased access to basic amenities, which include public restrooms and free drinking water in public spaces, to support active living and access to health-promoting resources.	**Consistent.** The Project's residential use does not include public spaces, but promotes active living with residential open space and recreational amenities for residents and their guests. The Project also includes a relocated and enhanced pedestrian entrance from Hope Street which provides access to publicly accessible open space areas adjacent to amenities within retail and other commercial uses, which also supports active living.
Chapter 5—An Environment Where Life Thrives	
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.	**Consistent.** The Project is estimated to generate lower VMT per capita for residents than the average for the area, as demonstrated in Section 4B. Additionally, the Project incorporates several design features, which include TDM measures to reduce the number of single occupancy vehicle trips , including bike parking for the new residential use per LAMC, including short-term and long-term parking facilities, as well as a reduction in vehicle parking supply. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.

[a] *Objectives, Policies, Programs, or Plans based on information provided in Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Los Angeles Department of City Planning, March 2015).*

Source: Eyestone Environmental, 2024.

Table IV.H-4
Project Consistency with Central City Community Plan

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
Policy 2-1.2: To maintain a safe, clean, attractive, and lively environment.	**Consistent.** The Project would provide pedestrian enhancements along Hope Street, such as enhanced paving along a portion of the existing sidewalk, a pedestrian entrance into the new residential lobby along Hope Street, and a relocated and enhanced pedestrian entrance into the Project Site from Hope Street. The location of three of the four existing pedestrian entrances, one along Hope Street and the other two along Flower Street, will remain unchanged and will continue to facilitate pedestrian access to the Project Site. The new residential tower will include residential open space and recreational amenities for residents and their guests to maintain an attractive and lively environment. The existing publicly accessible open space adjacent to commercial uses on the Project Site (outside of the Development Area) will remain and is accessible from pedestrian entrances to the Project Site, further maintaining an attractive and lively environment.
Policy 11-1.1: Encourage rail connections and High Occupancy Vehicle (HOV) lanes that will serve the downtown traveler.	**Consistent.** The Project Site contains a pedestrian portal leading directly to the adjacent 7th Street/Metro Center Station which provides direct connections to Union Station.
Policy 11-6.1: Preserve and enhance Central City's primary pedestrian-oriented streets and sidewalks and create a framework for the provision of additional pedestrian friendly streets and sidewalks which complement the unique qualities and character of the communities in Central City.	**Consistent.** The Project is a high-density residential project with existing commercial uses on-site that is conceived as a pedestrian- and transit- oriented development with pedestrian enhancements including a new pedestrian entrance into the residential lobby along on Hope Street, a relocated and enhanced pedestrian entry to the Project Site from Hope Street, as well as an on-site pedestrian portal to the adjacent 7th Street/Metro Center Station and proximity to other transit services. The Project will also include storefronts at the new ground level residential lobby and the relocated retail. The high quality finish materials of the ground level façade and storefronts will create interest at the pedestrian scale and enhance retail uses along Hope Street, further improving pedestrian-orientation. All existing sidewalks along the Project Site frontages will remain.
Policy 11-7.1: Encourage transportation strategies that include parking and TDM policies and actions that increase ridesharing and give priority to visitor/shopper parking.	**Consistent.** The Project design incorporates TDM measures to reduce the number of single occupancy vehicle trips to the Project Site through reduced vehicle parking supply and providing both long- and short-term bicycle parking per LAMC.

[a] *Objectives, Policies, Programs, or Plans based on information provided in the Central City Community Plan (Los Angeles Department of City Planning, 2003).*

Source: Eyestone Environmental, 2024.

- Accommodate anticipated growth through Year 2040 in an inclusive, equitable, sustainable, and healthy manner, while supporting and sustaining Downtown's ongoing revitalization;
- Reinforce Downtown's jobs orientation;
- Grow and support the residential base;
- Strengthen neighborhood character;
- Promote a transit-, bicycle-, and pedestrian-friendly environment;
- Create linkages between districts; and
- Create world-class streets and public realm.

The Project would support multi-mobility options and further diversify the existing uses on the Project Site by providing a high-density residential tower located in Downtown Los Angeles adjacent to the Metro 7th Street/Metro Center Station, as well as several other public transit options provided by Metro, LADOT DASH, LADOT's CE, AVTA, Santa Monica BBB, Foothill Transit, OCTA, Montebello Bus Lines, and Torrance Transit. The Project would provide high-density residential uses with direct access to on-site retail and commercial uses, and to nearby attractions, including Fig at 7th, Grand Hope Park, Sport venues, and shopping districts. The Project's residential uses, enhanced pedestrian connections, and Sign Supplemental Use District (Sign District) would strengthen and enrich the Project Site as an activity center and destination. The Sign District would assist in establishing a sense of place, emphasizing The Bloc's identity and increasing visibility to its diverse uses and unique internal retail plaza and directing visitors to its on-site commercial and retail uses. The Project's pedestrian portal to the Metro Station and multiple pedestrian entrances to the retail plaza would orient people to the Project Site and help connect them to other destinations and activity centers in the area.

As previously discussed, the Project would provide (1) TDM measures, including the provision of short- and long-term bicycle parking that would serve to promote use of bicycles and (2) pedestrian enhancements along Hope Street, including, but not limited to, a new pedestrian entrance to the new residential lobby, a new storefront for relocated retail space and a relocated pedestrian passageway to the retail plaza; new replacement street trees; and enhanced sidewalk paving along a 190-foot portion of Hope Street. The Project would also provide multiple pedestrian/bicyclist connections to the public streets and sidewalks and access to a Class IV Protected Bike Lane along 7th Street as well as several nearby bikeshare stations. These features would serve to reduce the number of vehicles trips to the Project Site. Additionally, the Project would retain the existing subterranean and above grade parking levels. The parking spaces in the existing parking podium levels

would be reconfigured and two new levels of parking would provide new parking spaces and would not be exposed to pedestrians traveling on adjacent streets.

Based on the above, the Project would not conflict with the applicable policies of the Draft Downtown Los Angeles Community Plan. .

(e) Los Angeles Municipal Code

(i) LAMC Section 12.21 A.16 (Bicycle Parking)

As shown in Table IV.H-5 on page IV.H-46, pursuant to LAMC Section 12.21 A.16, the Project would require 212 residential bicycle parking spaces (20 short-term, 192 long-term). The Project would provide 214 bicycle parking spaces (22 short-term, 192 long-term). Twelve of the short-term spaces bicycle parking spaces would be located indoors and 10 of the short-term bicycle parking spaces would be located outside on the public sidewalk. The Project would provide the LAMC-required bicycle parking and would not conflict with LAMC Section 12.21 A.16.

(ii) LAMC Section 12.26 J (TDM Ordinance)

The Project proposes 466 residential units and no new non-residential floor area. As LAMC Section 12.26 J applies only to the construction of new non-residential gross floor area and to developments in excess of 25,000 square feet of commercial area, the Project would not be subject to such requirements. Therefore, the Project would not conflict with LAMC Section 12.26 J.

(iii) LAMC Section 14.4.5

As discussed in Section II, Project Description, of this Draft EIR, the Applicant has requested that the City approve a Sign District as part of the Project. The proposed Sign District's Conceptual Sign Plan includes a total of 18 signs, of which nine are digital display signs, three are non-digital wall signs, six are non-digital identification signs. Digital display signs would include off-site advertising. Additionally, the Conceptual Sign Plan includes eight digital kiosks (three floor-mounted and five wall-mounted) that are considered to be signs under applicable City regulations. These digital kiosks would identify tenants and serve to orient and direct visitors to the diverse uses at the Project Site and would include off-site advertising. As discussed in the Traffic Hazards Review Letter, the signs would not constitute a hazard to the safe and efficient operation of vehicles on adjacent streets or nearby freeways or create a condition that endangers the safety of persons or property. Therefore, the Project would not conflict with LAMC Section 14.4.5.

Table IV.H-5
Bicycle Parking Spaces Required by City Code

Land Use	Size	Short-Term		Long-Term		Total Required Bicycle Spaces
		Bicycle Parking Ratio[a]	Required Bicycle Spaces	Bicycle Parking Ratio[a]	Required Bicycle Spaces	
Apartment	25: 1–25 du	1 per 10 du	3	1 per 1 du	25	28
	75: 26–100 du	1 per 15 du	5	1 per 1.5 du	50	55
	100: 101–200 du	1 per 20 du	5	1 per 2 du	50	55
	266: 201–455 du	1 per 40 du	7	1 per 4 du	67	74
	466 du total		*20*		*192*	*212*
Project Total			**20**		**192**	**212**

du = dwelling units
sf = square feet
[a] *LAMC Section 12.21 A,16.*
Source: Eyestone Environmental, 2024.

(f) LADOT Vision Zero

As noted above, 7th Street and 8th Street have been identified as a part of the HIN. While no Vision Zero Safety improvements are currently planned near the Project Site,[12] Project improvements to the pedestrian environment would not preclude future improvements by the City. As discussed above in Subsection 3.d.(1) per the Mobility Plan, service and truck access to the loading area would continue to be provided via the existing loading driveway on 8th Street, and the Project's site planning would provide a safe and comfortable walking component, which would enhance the existing pedestrian environment. Further, as demonstrated in the analysis for Threshold (c) below, the Project would not introduce hazards due to incompatible uses along 7th Street and 8th Street. Therefore, the Project would not conflict with Vision Zero.

(g) Streetscape Plans

There are no City streetscape plans adjacent to the Project Site. Therefore, the Project would not conflict with City streetscape plans.

[12] *City of Los Angeles, Vision Zero Safety Improvements, http://ladot.maps.arcgis.com/apps/View/index.html?appid=77df605a3eb142c7a0abc1c65bcf4861, accessed October 4, 2022.*

(h) 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. The Pedestrian-First Design guidelines are as follows:

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

Consistent with the Citywide Design Guidelines, the Project would maintain the existing sidewalks, pedestrian amenities (including public and private open spaces), and vehicular access driveways. As previously discussed, the Project would introduce a new pedestrian entrance to the new residential lobby, as well as a new storefront for relocated retail space and a relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building, which would serve to activate the streets and provide direct connection between the Project Site and the public right-of-way. The Project would also include enhanced sidewalk paving, five replacement street trees in landscape tree wells to provide for shade and natural habitat, and short-term bicycle parking within a 190-foot portion of Hope Street, thereby providing a more comfortable pedestrian environment. The Project Site's proximity to multiple transit services, including the Metro 7th Street/Metro Center Station, would also promote the use of transit and other alternative modes of transportation. Additionally, all vehicular access to the Project Site would be separate from the pedestrian and bicycle access points. Existing mirrors at the driveways would remain and would continue to make drivers aware of approaching pedestrians. Furthermore, as previously discussed, pursuant to Project Design Feature TR-PDF-2, the Project would install signalized alert systems at all four existing vehicle parking garage driveways, to warn pedestrians and bicyclists of vehicles exiting Project driveways. Therefore, the Project would not conflict with the transportation-related Citywide Design Guidelines.

(i) Other Plans and Policies

As discussed in detail in Section IV.E, Land Use and Planning, of this Draft EIR, the Project would not conflict with SCAG RTP/SCS 2020-2045 policies related to encouraging pedestrian activity and reducing VMT.

(j) Conclusion

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to applicable programs, plans, ordinances, and policies addressing the circulation system were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As previously discussed above, Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease per capita VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

As discussed above, the Project Site is located in the Central APC area and is subject to the LADOT threshold of 6.0 household VMT per capita for determining VMT impacts.

The City's VMT Calculator (Version 1.3, July 2020) was used to evaluate Project per capita VMT and compare it to the VMT impact criterion. The VMT Calculator worksheets for the Project are included as Appendix D of the Transportation Assessment.

The Project's proposed land uses and their respective sizes are the primary input in the VMT Calculator. As discussed in Section II, Project Description, of this Draft EIR, the Project would include the development of 466 residential units and the Sign District. Based on the VMT Calculator results, as summarized in Table IV.H-6 on page IV.H-50, the Project would result in a Household VMT per capita of 2.4, which would be less than the 6.0 VMT per capita threshold. As such, the Project would reduce rather than increase per capita VMT within the Central APC. **Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and the impact would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to VMT pursuant to CEQA Guidelines Section 15064.3 and LADOT's TAG were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Table IV.H-6
VMT Analysis Summary

Land Use Information	Project
Multi-Family Housing	466 du
VMT Analysis	
Residential Population	1,050
Employee Population	N/A
Project Area Planning Commission	Central
Total Daily Trips	1,213
Total Daily VMT	7,564
Household VMT per Capita	2.4
Impact Threshold	6.0
Significant Impact?	No

du = dwelling unit
N/A = Not Applicable
Source: Gibson Transportation Consulting, 2024.

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

(1) Impact Analysis

(a) Geometric Design Feature and Incompatible Uses Analysis

As summarized in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would not introduce hazards due to incompatible uses, such as farm equipment. Additionally, the Project would not include new vehicular access improvements. As previously discussed, vehicular access to the Project would be provided from existing ingress/egress driveways at the southern portion of the Project Site, along Hope Street, 8th Street, and Flower Street. Existing mirrors at the driveways would remain and would continue to make drivers aware of approaching pedestrians. Additionally, pursuant to Project Design Feature TR-PDF-2, the Project would install signalized alert systems at all four existing vehicle parking garage driveways, to warn pedestrians and bicyclists of vehicles exiting Project driveways. Furthermore, as detailed in the Traffic Hazards Review Letter included as Appendix I.2 of this Draft EIR, the Project's proposed digital signage would be consistent with LAMC signage requirements and would not conflict with the LADOT Hazards Determination Review checklist. Furthermore, the light resulting from the Project's proposed signage program visible to drivers along roadways would not

exceed the CVC's maximum permissible luminance standards within drivers' field of view during the day or during periods of low sun intensity, such as overcast, twilight or nighttime conditions. Thus, the proposed signage program would not create traffic hazards for vehicles, pedestrians, or bicyclists along Hope Street, Flower Street, 7th Street, or 8th Street. **As such, as determined in the Initial Study, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and no impacts would occur.**

(b) Freeway Safety Analysis

As discussed above in the Regulatory Framework subsection, the TAG provides guidance on freeway safety analyses for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted 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.

LADOT's TAG requires analysis of freeway off-ramps where a proposed development project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queueing 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 is not required.

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

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

As shown in Table IV.H-7 on page IV.H-52, the Project would add fewer than 25 trips to the freeway off-ramps analyzed in both the morning and afternoon peak hours. Therefore, further analysis is not required, and the Project would not increase hazards related to freeway off-ramps.

Table IV.H-7
Project Trip Volumes Added to Off-Ramps

Off-Ramp Location	Project-Added Trip Volumes	
	A.M. Peak Hour	P.M. Peak Hour
I-110 Northbound Off-Ramp at 9th Street	3	11
I-110 Southbound Off-Ramp at 9th Street	3	11

Source: Gibson Transportation Consulting, 2024.

Based on the above, the Project would not result in a substantial increase in hazards due to a geometric design feature or incompatible use, and impacts, including freeway safety impacts, would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to hazardous geometric design features or incompatible use were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction

Emergency services in the vicinity of the Project Site are provided by the LAFD and the Los Angeles Police Department (LAPD). The nearest designated disaster route to the Project Site is Figueroa Street, located approximately 0.08 mile west of the Project Site.[13]

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

Construction activities associated with the Project (i.e., staging and movement of construction equipment, hauling of soil and materials, daily construction worker traffic, etc.) could potentially impact the provision of emergency services by the LAFD and LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Specifically, as described in the Transportation Assessment, included as Appendix I.1 of this Draft EIR, it is expected that construction fences may encroach into the public right-of-way and the sidewalk and one travel land on Hope Street would temporarily be utilized as a staging area for construction equipment adjacent to the Project Site. These short-term and temporary construction activities could temporarily increase response times for emergency vehicles due to travel time delays caused by traffic during the Project's construction phase. However, with implementation of the CTMP, prepared pursuant to Project Design Feature TR-PDF-1, emergency access would not be impeded. Specifically, the CTMP would be prepared by the Project Applicant for approval by LADOT prior to the start of construction to ensure that adequate and safe access would remain available within and near the Project Site during construction activities. Public right-of-way would be maintained along the Flower Street, 7th Street, and 8th Street Project frontages throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on the City-designated disaster routes. **Therefore, the Project would not result in inadequate emergency access during construction, and the impact would be less than significant.**

(b) Operation

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As shown in Figure III-1 in Section III, Environmental Setting, of the Draft EIR, a total of 44 related projects are located generally within 0.5 mile of the Project Site. The related projects comprise a variety of uses, including residential, commercial, hotel, and office uses, as well as mixed-use developments incorporating some or all of these elements. Although the buildout years of many of the related projects are uncertain and may well extend beyond the Project's buildout year, and notwithstanding that some may not ultimately be approved or developed, all related projects were assumed to be completed by the estimated Project buildout year (i.e., 2031) for purposes of the traffic analysis.

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

In accordance with the TAG, the cumulative analysis of consistency with transportation plans and policies must include consideration of the related projects within 0.5 mile of the Project Site and any transportation system improvements in the vicinity of the Project Site.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, the Project's impacts in terms of conflicts with programs, plans, ordinances or policies addressing the circulation system would be less than significant. The majority of the programs, plans, policies, and ordinances reviewed under Threshold (a) above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21 A,16 and the TDM Ordinance from LAMC Section 12.26 J apply to projects individually. Also, in many cases, the Project would specifically support key policies (such as enhancing pedestrian infrastructure), while nearby related projects would neither support nor interfere with such policies. In addition, each related project would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Lastly, as indicated in the Project-level

analysis under Threshold (a) above, the Project would not result in significant inconsistencies with applicable transportation plans; as such, the Project would not contribute considerably to any cumulative inconsistencies. **Therefore, the Project, together with the related projects, would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances, and cumulative impacts would be less than significant.**

(b) Vehicle Miles Traveled

As discussed in the LADOT TAG, a development project would have a cumulative VMT impact if it were to result in significant Project-level VMT impacts and were deemed inconsistent with the SCAG 2020–2045 RTP/SCS in terms of development location, density and intensity. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. As indicated in the Project-level analysis under Threshold (b) above, the Project would result in a less-than-significant VMT impact. The Project would also not conflict with the RTP/SCS as indicated in the Project-level analysis under Threshold (a) above (refer to Section IV.E, Land Use and Planning, of this Draft EIR for a detailed discussion of the Project consistency with the SCAG RTP/SCS). **Therefore, the Project's cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

(c) Hazardous Geometric Design Features

As previously discussed, a project would not have the potential to result in significant freeway safety impact unless it adds 25 or more trips to any off ramp in either the morning or afternoon peak hour. As indicated in the Project-level analysis under Threshold (c) above, as the Project trips would not exceed this screening threshold at any area off ramps, the Project's impacts to freeway safety would be less than significant. As such, the Project would not make a considerable contribution to cumulative freeway safety impacts. **Therefore, significant cumulative impacts related to hazardous geometric design features would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts with respect to hazardous geometric design features would be less than significant.**

(d) Emergency Access

As analyzed in the Project-level analysis under Threshold (d) above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. Currently, no identified related projects are proposed with access points along the same block as the Project, which encompasses the entire block. The nearest related project is the Related Project No. 3 (8th/Grand/Hope Project) located at 754 South Hope Street, immediately adjacent to the Project Site across

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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