IV. Environmental Impact Analysis
I. Transportation

1. Introduction

This section analyzes the Project's potential impacts on transportation. The analysis is primarily based on the *Transportation Assessment for the 6th and Alameda Studio Project* (Transportation Assessment)[1] prepared for the Project by Gibson Transportation Consulting, Inc., dated September 2023 and included in Appendix I of this Draft EIR.

The Transportation Assessment was prepared pursuant to the Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines* (TAG) dated July 2020 and updated in August 2022, which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (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), which was reviewed and approved by LADOT in September 2023. 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 Letters for the Transportation Assessment dated July 17, 2024, is included in Appendix I of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding transportation at the federal, State, regional, and City

[1] *Gibson Transportation Consulting, Inc., Transportation Assessment for the 6th and Alameda Studio Project, Los Angeles, California, September 2023.*

of Los Angeles levels that apply to the Project. As described below, these plans, guidelines, and laws include:

- Americans with Disabilities Act of 1990 (ADA)
- Complete Streets Act
- Assembly Bill (AB) 32 and Senate Bill (SB) 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)
- City of Los Angeles Mobility Plan 2035
- Central City North Community Plan
- Los Angeles Municipal Code (LAMC)
- LADOT Transportation Assessment Guidelines (TAG)
- 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
- Los Angeles River Design Guidelines.

(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 eight-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. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well

served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

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

Based on these changes, on July 30, 2019, the City of Los Angeles City Council adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's CEQA transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743, in July 2019 with updates in July 2020 and August 2022.

(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

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

[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.*

compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the 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 vehicle miles and improvements to the transportation system.

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016–2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs), and Livable Corridors. These areas account for 4 percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. 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, a 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.

[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 North 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 North Community Plan (Community Plan) area. The Community Plan was adopted in 2000 and amended in 2016 as part of the Mobility Plan Update. While the DTLA 2040 Plan, an update to the Community Plan, is under development, the plan from 2016 is currently in effect.[5] The Community Plan includes transportation-related objectives, policies, and programs, as well as design policies included in the Urban Design chapter, which are focused on enhancing the pedestrian environment and reducing VMT. Additionally, a Transportation Improvement and Mitigation Plan (TIMP) was prepared for the Community Plan. The TIMP establishes a program of specific measures which are recommended to be undertaken during the life of the Community Plan.

[5] *The City of Los Angeles Department of City Planning updated the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. On May 3, 2023, the Los Angeles City Council voted unanimously to approve the DTLA 2040 Plan. Following City Council approval, the implementing ordinances will be reviewed and finalized by the City Attorney to ensure clarity of regulations and consistency with state law. DTLA 2040 will be brought into effect by the City Council upon adopting the implementing ordinances after completion of form and legality review.*

(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.

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

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

(d) LADOT Transportation Assessment Guidelines

On July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model, and transportation impact thresholds based on VMT pursuant to CEQA Guidelines Section 15064.3 and the 2019 CEQA updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in August 2022. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation

thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies, including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[6]

(e) LADOT Manual of Policies and Procedures Section 321

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

(f) Vision Zero

The Vision Zero 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) 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.

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

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

(i) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[7] Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

(j) Los Angeles River Design Guidelines

The River Improvement Overlay (RIO) District is a special use district established by Ordinance Nos. 183,144 and 183,145 in August 2014 to support the goals of the Los Angeles River Revitalization Master Plan; contribute to the environmental and ecological health of the City's watersheds; establish a positive interface between river adjacent property and river parks and/or greenways; promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods; provide native habitat and support local species; provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; provide safe, convenient access to and circulation along the river; promote the river identity of river adjacent communities; and support the Low Impact Development Ordinance and the City's Irrigation Guidelines. The RIO District Ordinances establish landscaping, design criteria, and administrative review procedures for projects within the RIO District.[8] The Los Angeles River Design Guidelines complement the Los

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

[8] *City of Los Angeles Department of City Planning, Zoning Information No. 2358, River Improvement Overlay District, Ordinance Nos. 183,144 and 183,145, revised January 12, 2015.*

Angeles River Revitalization Master Plan and builds on the original draft Los Angeles River Design Guidelines from July 2015.[9]

b. Existing Conditions

The study area considered in the Transportation Assessment (Study Area) includes a geographic area that is generally bounded by 6th Street to the north, Mateo Street to the east, 7th Street to the south, and Alameda Street to the west, as well as the existing street system described below. The existing street system and transportation facilities in the Study Area are shown in Figure IV.I-1 and Figure IV.I-2 on page IV.I-14 and IV.I-15, respectively.

(1) Existing Street Systems

The existing street system in the transportation Study Area consists of freeways, arterials, and collector and local streets that provide regional, sub-regional, or local access and circulation within the Study Area. These transportation facilities generally provide two to six travel lanes and usually allow parking on either side of the street. Typically, the speed limits range between 25 and 35 miles per hour (mph) on the streets and between 55 and 65 mph on freeways.

(a) Freeways

Primary regional access to the Project Site is provided by the Santa Ana Freeway (U.S. Highway 101 or US 101), the Golden State Freeway (Interstate 5 or I-5), and the Santa Monica Freeway (I-10). The following is a brief description of the freeways located in the Study Area:

- US 101 generally runs in the north-south direction and is located less than 1 mile east of the Project Site. In the vicinity of the Project Site, US 101 provides three travel lanes in each direction. Access to and from US 101 is available via interchanges at Alameda Street, Vignes Street, Commercial Street, 1st Street, 4th Street, 7th Street, and Whittier Boulevard.

- I-5 generally runs in the north-south direction and is located less than 1 mile east of the Project Site. In the vicinity of the Project Site, I-5 provides five travel lanes in each direction. Access to and from I-5 is available via interchanges at 4th Street and Boyle Avenue.

[9] *City of Los Angeles, LA River Design Guidebook: Boyle Heights, Arts District, Lincoln Heights, Chinatown East, 2016.*

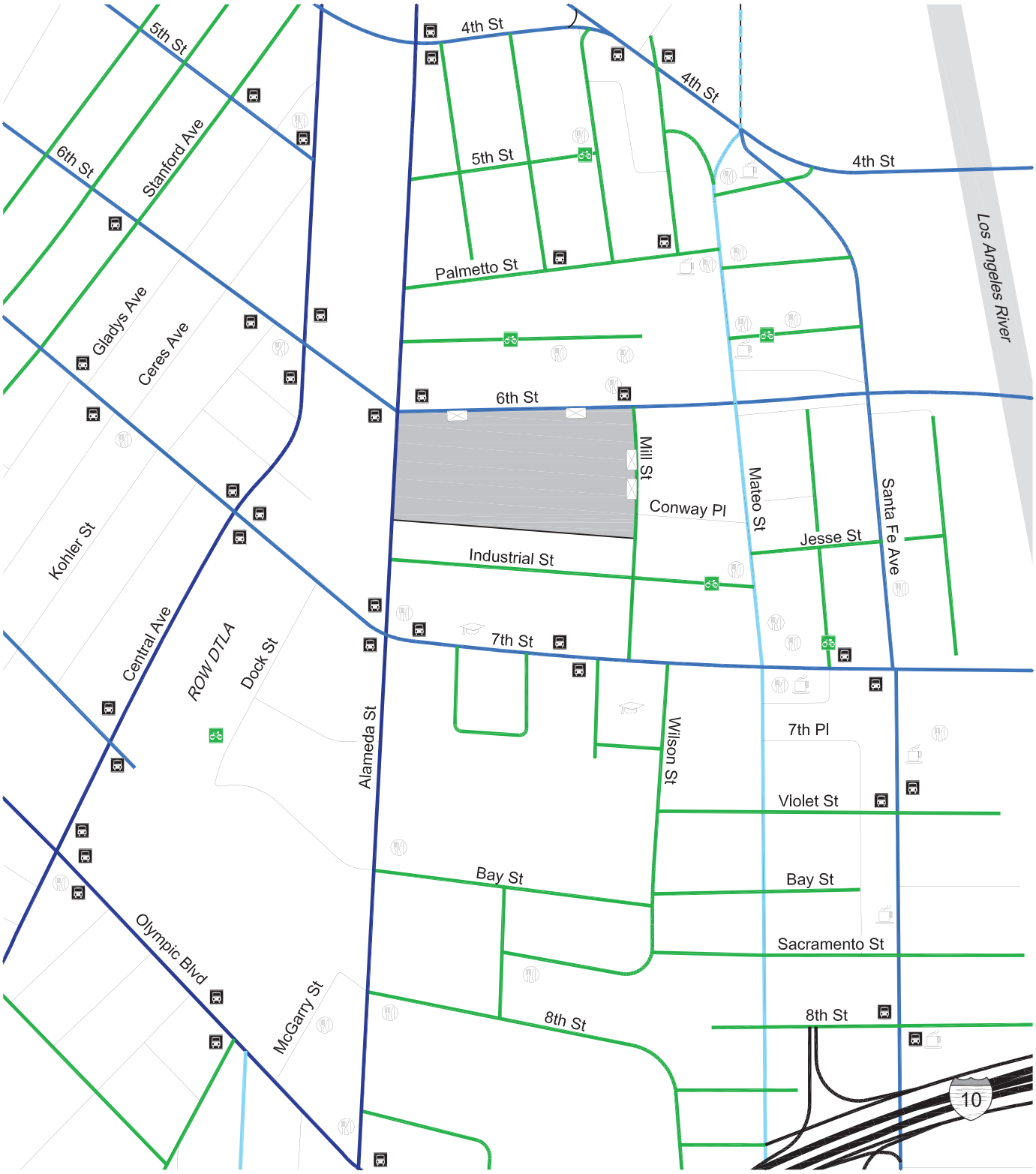

Figure IV.I-1
Existing Street System

Source: Gibson, 2023.

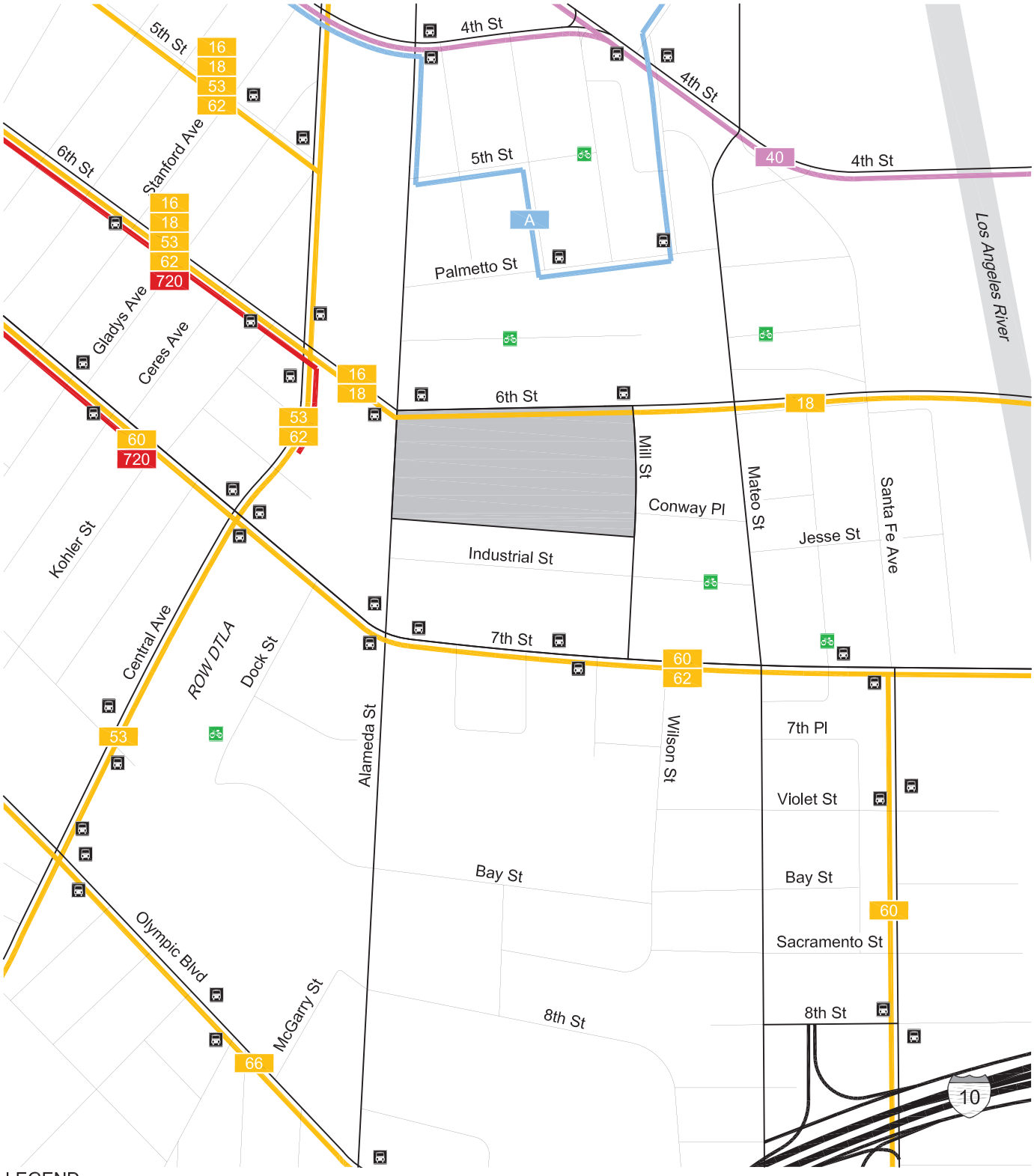

Figure IV.I-2
Existing Transit Network

Source: Gibson, 2023.

- I-10 generally runs in the east-west direction and is located approximately 1 mile south of the Project Site. In the vicinity of the Project Site, I-10 provides three to five travel lanes in each direction. Access to and from I-10 is available via interchanges at 8th Street, Porter Street, Mateo Street, Olympic Boulevard, and Alameda Street.

(b) Roadways

Listed below are the primary streets and highways that provide regional and local access to the Project Site:

- Alameda Street is a designated Avenue I. It travels in the north-south direction and is located adjacent to the western boundary of the Project Site. It provides four travel lanes, two in each direction, with left-turn lanes at intersections and a two-way left-turn median. On-street parking is generally prohibited within the Study Area.

- Mill Street is a designated Collector Street. It travels in the north-south direction and is located adjacent to the eastern boundary of the Project Site. It provides two travel lanes, one in each direction. Unmetered parking is generally available on both sides of the street between 6th Street and Industrial Street.

- Mateo Street is a designated Avenue III. It travels in the north-south direction and is located one block east of the Project Site. It provides two travel lanes, one in each direction. Unmetered parking is generally available on both sides of the street within the Study Area. Class II bicycle lanes are provided on both sides of the street north of 6th Street.

- 6th Street is a designated Avenue II. It travels in the east-west direction and is located adjacent to the northern boundary of the Project Site. It provides four travel lanes, two in each direction, with left-turn lanes at intersections. Restricted unmetered parking is generally available on the north side of the street between Alameda Street and Mill Street within the Study Area. Class II bicycle lanes are provided on both sides of the street between Alameda Street and Mateo Street adjacent to the Project Site. Class IV protected bicycle lanes are provided on 6th Street on the north side of the street west of Alameda Street and on both sides of the street east of Mateo Street.

- 7th Street is a designated Avenue II. It travels in the east-west direction and is located two blocks south of the Project Site. It provides four travel lanes, two in each direction, with left-turn lanes at intersections. Unmetered parking is generally available on the south side of the street east of Mateo Street and west of Alameda Street as well as on the north side of the street between Channing Street and Lawrence Street with passenger loading restrictions from 6:30 A.M. to 9:00 A.M. and 1:30 P.M. to 4:00 P.M.

(2) Existing Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

The signalized intersections surrounding the Project Site provide access in the vicinity of the Project Site. The signalized intersections provide pedestrian phasing, crosswalk striping, and Americans with Disabilities (ADA) accessible ramps at most crosswalks. Additional pedestrian facilities, not immediately adjacent to the Project Site, are located within the Study Area.

(b) Bicycle Facilities

Based on the City's 2010 Bicycle Plan, the City's existing bicycle system consists primarily 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. Class III bicycle routes and bicycle-friendly streets are those whose motorists and cyclists share the roadway and there is no separated striping for bicycle travel. Bicycle routes and bicycle-friendly streets are preferably located 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, makes motorists aware of bicycles potentially in the travel lane, and shows bicyclists the correct direction of travel.

As detailed in the Transportation Assessment, within the Study Area, Class II bicycle facilities are currently provided on Mateo Street north of 6th Street and on 6th Street between Alameda Street and Mateo Street adjacent to the Project Site. Class IV protected bicycle lanes are provided on 6th Street on the north side of the street west of Alameda Street and on both sides of the street east of Mateo Street. Class IV protected bicycle lanes include cycle tracks, bicycle traffic signals, and demarcated areas to facilitate turns at intersections and along neighborhood streets and provide further protection from other travel lanes.

(3) Existing Transit System

As detailed in the Transportation Assessment, the Project Site is served by a number of public transit lines and is located within 0.25 mile of a Major Transit Stop. Specifically, the Project Site is located within 0.25 mile of the bus stop at Central Street and 6th Street, which is served by the Los Angeles County Metropolitan Transportation Authority (Metro) Lines 16, 18, 53, 60, 62, 66, and 720. Additionally, the Project Site is located approximately 0.85-mile south of the Metro Little Tokyo/Arts District Station, which serves the A and E Lines. The A Line travels between Azusa and Long Beach and the E Line travels between Santa Monica and East Los Angeles. Additional transit lines within the Study Area include one LADOT Downtown Area Short Hop (DASH) bus line, and one Montebello Bus Line. The following provides a brief discussion summarizing the various transit lines providing service in the

Study Area. For additional information of the transit lines operating in the Study Area, refer to Table 2 of the Transportation Assessment, attached as Appendix I.

- Metro Line 16 provides local service between Downtown Los Angeles and West Hollywood via 3rd Street. Metro Line 16, which operates 24 hours a day, has an average headway of 6 minutes during the A.M. and P.M. peak periods.

- Metro Line 18 provides local service between the Wilshire Center in Downtown Los Angeles to Montebello via 6th Street and Whittier Boulevard. Metro Line 18, which operates 24 hours a day, has average headways of 6 to 7 minutes during the A.M. and P.M. peak periods.

- Metro Line 53 provides local service between Downtown Los Angeles and California State University, Dominguez Hills via Central Avenue. Metro Line 53, which operates between the hours of 4:00 A.M. to 12:00 A.M., has an average headway of 11 minutes during the A.M. peak period and average headways of 10 to 11 minutes during the P.M. peak periods.

- Metro Line 60 provides local service between Downtown Los Angeles and Artesia Station via Long Beach Boulevard. Metro Line 60, which operates 24 hours a day, has an average headway of 6 minutes during the A.M. and P.M. peak periods.

- Metro Line 62 provides local service between Downtown Los Angeles and Hawaiian Gardens via Telegraph Road. Metro Line 62, which operates between the hours of 4:00 A.M. to 12:00 A.M., has average headways of 24 to 60 minutes during the A.M. peak period and 30 to 60 minutes during the P.M. peak period.

- Metro Line 66 provides local service between the Wilshire Center in Downtown Los Angeles and Montebello via 8th Street and Whittier Boulevard. Metro Line 66, which operates 24 hours a day, has average headways of 9 to 10 minutes during the A.M. peak period and 9 to 11 minutes during the P.M. peak period.

- Metro Line 720 provides rapid service between Santa Monica and Downtown Los Angeles. Metro Line 720, which operates 24 hours a day, has average headways of 5 to 6 minutes during the A.M. peak period and 6 to 8 minutes during the P.M. peak period.

- LADOT DASH A shuttle provides local service from Little Tokyo to City West. The shuttle, which operates between the hours of 6:00 A.M. to 9:00 P.M., has an average headway of 7 minutes during the A.M. and P.M. peak periods.

- Montebello Bus Line M40 provides local service between Downtown Los Angeles and Whittier. Montebello Bus Line M40, which operates between the hours of 5:30 A.M. to 9:30 P.M., has average headways of 18 to 23 minutes during the A.M. peak period and an average headway of 20 minutes during the P.M. peak period.

(4) Existing High Injury Network Facilities

Vision Zero is a traffic safety policy that promotes strategies to eliminate transportation-related collisions that result in severe injury or death. Vision Zero has identified the High Injury Network (HIN), a network of streets included based on collision data from the last five years, where strategic investments by LADOT will have the biggest impact in reducing death and severe injury. Streets identified in the HIN in the Study Area include 6th Street between Alameda Street and Mateo Street (along the northern boundary of the Project Site) and west of Stanford Avenue, 7th Street west of Mateo Street, and Alameda Street north of 6th Street.

(5) Existing Project Site Conditions

The Project Site is located within the Central City North Community Plan area of the City and is bounded by 6th Street to the north, Mill Street to the east, commercial and industrial zoned land currently developed with warehouse uses to the south, and Alameda Street to the west. There is a 30-foot strip of land adjacent to the south of the Project Site labeled as Wholesale Street on the City's Zone Information and Map Access System (ZIMAS) map. However, this is not a public right-of-way, and the land is privately-owned and zoned for commercial uses. The Project Site is located within a fully developed area, and is located in a City-designated Transit Priority Area (TPA) and within a SCAG-designated High Quality Transit Area (HQTA).

The Project Site is currently developed with two single-story warehouse structures. The existing buildings are currently used for storage and distribution purposes. The Project Site also includes surface parking areas for automobiles and tractor trailer trucks. The Project Site is relatively flat with limited ornamental landscaping. Local access to the Project Site is provided by 6th Street, Alameda Street, and Mill Street.

c. Future Cumulative Transportation Conditions

(1) Related Projects and Ambient Growth

In accordance with the TAG and MOU, the future conditions analysis 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 21 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.[10] Although the buildout years for many of these related projects are uncertain and may

[10] *In accordance with the TAG, related projects considered in the cumulative analysis should include known development projects within a one-half mile radius of a project site.*

well be beyond the Project's buildout year, and not withstanding that some may not be approved or developed, all related projects were considered. Therefore, the projected traffic growth as a result of the related projects is a conservative estimate. In addition, in accordance with the MOU, the future conditions analysis also assumes a one-percent annual increase in ambient growth due to regional growth and development outside the Study Area.

(2) Future Base Transportation System Improvements

The transportation network within the Study Area could be affected by regional improvement plans, local specific plans, and programmed improvements implemented prior to buildout 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 buildout of the Project. 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 following proposed improvements were evaluated for their potential effects on the future roadway configurations:

- Metro Arts District/6th Street Station—Metro is exploring opportunities to provide a new Metro Rail station near 6th Street that would provide Metro B Line and/or D Line service to the Arts District, Boyle Heights, and surrounding communities.

- Metro West Santa Ana Branch (WSAB)—Metro's WSAB Transit Corridor project would provide a new 19-mile light rail transit line connecting Downtown Los Angeles with southeast Los Angeles County. Metro recently selected the locally preferred alternative, which proposes a first phase of the WSAB that includes a 14.8-mile, nine-station transit line connecting the Metro A Line Slauson Station to the City of Artesia. The Final Environmental Impact Statement/EIR for this first phase is scheduled for certification by the end of 2024. Metro has also selected Union Station as the terminus for the WSAB project. However, Metro is still in the process of evaluating potential alignment routes that would connect the Metro A Line Slauson Station to Union Station.

Additionally, in the Mobility Plan, the City identified key corridors as components of various "mobility-enhanced networks." Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements that may be implemented in those networks have not yet been identified, and there is no schedule for implementation; therefore, no changes to vehicular lane configurations were made or incorporated into the analysis as a result of the Mobility Plan. However, the following mobility-enhanced networks included corridors within the Study Area:

- Transit Enhanced Network (TEN)—The TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase

transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. The TEN has designated 6th Street and Central Avenue within the Study Area as part of the network.

- Neighborhood Enhanced Network (NEN)—The NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of Local Streets that are slow moving and safe enough to connect neighborhoods through active transportation. The NEN has designated Mateo Street and Santa Fe Avenue within the Study Area as part of the network.

- Bicycle Enhanced Network (BEN)—Within the Study Area, the Mobility Plan designated 6th Street for a Tier 1 Protected Bike Lane as part of the BEN. 7th Street and Mateo Street north of 7th Street have also been designated within the Study Area with Tier 2 Bike Lanes.

- Pedestrian Enhanced District (PED)—The Mobility Plan aims to promote walking to reduce the reliance on automobile travel by providing more attractive and pedestrian-friendly sidewalks, as well as adding pedestrian signalizations, street trees, and pedestrian-oriented design features. Alameda Street south of 6th Street, 7th Street west of Mill Street, Mateo Street north of 7th Street, and 6th Street west of Alameda Street and east of Mill Street are identified as part of the PED.

In addition to the mobility-enhanced networks above, the Mobility Plan also identifies Vehicle Enhanced Networks (VEN). As discussed in the Regulatory Framework subsection above, the VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times. There are no VEN corridors located within the Study Area.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access.

For this analysis, the Appendix G Thresholds provided above are relied upon. The methodology and base assumptions used in this analysis were established by LADOT as set forth in the TAG and MOU.

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 in 2019 and updated it in 2020 and again in 2022. The analysis in this section and the Transportation Assessment, included as Appendix I of this Draft EIR, uses the latest 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 the Regulatory Framework subsection 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 or 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 or 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

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 existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.

- 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.

- For regional serving projects including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT. Retail projects fewer than 50,000 square feet in size are considered local-serving and are assumed to have a negligible effect on VMT and are therefore not considered for the purposes of identifying significant VMT impacts. New retail uses greater than 50,000 square feet may also be considered local-serving if an applicant provides documentation that most of the vehicle trips would originate from the project area.

Table 2.2-1 of the TAG provides the daily household VMT per capita and daily work VMT per employee impact thresholds for the APC areas. The Project Site is located in the Central APC area and the corresponding daily work VMT per employee 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

The following describes the methodology by which vehicle trips and VMT are calculated in City of Los Angeles VMT Calculator Version 1.4 (LADOT, June 2023) (VMT Calculator), as detailed in the City of Los Angeles VMT Calculator Documentation (LADOT and LADCP, May 2020). LADOT developed the VMT Calculator to estimate project-specific daily work VMT per employee for developments within City limits. The daily work VMT per employee are based on the following types of one-way trips:

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

As detailed in City of Los Angeles VMT Calculator Documentation, the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, while the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Additionally, as noted above, small-scale retail/restaurant components less than 50,000 square feet are not considered for the purposes of identifying significant work VMT per employee impacts as those trips are assumed to be local serving and would have a negligible effect on VMT.

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

Based on a review of relevant empirical and historical data, and in consultation with LADOT, it was determined that the daily trip generation characteristics and patterns of the Project's employee-based studio-related land uses were similar in scope and behavior to the characteristics of the general office land use in *Trip Generation Manual, 11th Edition*. As such, a custom land use input was developed to evaluate the VMT generated by the Project's

studio-related land uses (including the sound stage and production support uses), which are not land use categories recognized within the VMT Calculator. The daily trip generation estimates for the Project's studio-related uses are based on empirical rates from other studios in the City. The trip characteristics and patterns of studio-related uses are similar in scope and behavior to the general office land use. Therefore, the custom land use input for the studio-related uses utilized the trip purpose assumptions for the general office land use.

The VMT Calculator 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, as further described below.

(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 the City's *VMT Calculator Documentation*, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City. TBZs are categorized as follows:

1. **Suburban (Zone 1):** Very low-density areas primarily centered around single-family homes and minimally connected street network.

2. **Suburban Center (Zone 2):** Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.

3. **Compact Infill (Zone 3):** Higher-density neighborhoods that include multi-story buildings and well-connected streets.

4. **Urban (Zone 4):** High-density neighborhoods characterized by multi-story buildings with a dense road network.

The VMT Calculator determines a project's TBZ based on the latitude and longitude of a project site address. The Project Site is located in a Suburban Center (Zone 2) TBZ.

(ii) Mixed-Use Development Methodology

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

- The project location's jobs/housing balance

- Land use density of the project
- Transportation network connectivity
- Availability of and proximity to transit
- Proximity to retail and other destinations
- Vehicle ownership rates
- Household size

(iii) Trip Lengths

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

(iv) 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.[11] 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.*

(v) 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. The following seven categories of TDM strategies are included in the VMT Calculator:

1. Parking
2. Transit

[11] *The 2020 LAUSD Developer Fee Justification Study and Trip Generation Manual, 11th Edition are now available; however, the City's VMT Calculator utilized the editions indicated herein.*

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

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented by the California Air Pollution Control Officers Association in the report *Quantifying Greenhouse Gas Mitigation Measures*.[12]

(4) Hazardous Geometric Design Features

(a) Geometric Design Feature and Incompatible Use 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.

(b) Freeway Safety Analysis

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

Based on the Freeway Guidance, a transportation assessment for a development project must include analysis of any freeway off-ramp where the project adds 25 or more

[12] *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.*

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

1. Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes.

2. A project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.

3. The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 mph.

(5) Emergency Access

The analysis of the Project's potential access impacts includes a review of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination was 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 a staging plan, will be prepared and submitted to the City for review and approval, prior to commencing construction. The Construction Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.

- Prohibition of haul staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Containment of construction activity within the Project Site boundaries, as feasible.
- Implementation of safety precautions for pedestrian and bicyclists through such measures as alternate routing and protection barriers.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours.
- Spacing of trucks so as to discourage a convoy effect.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Section 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 apply to the Project: the Mobility Plan; Plan for a Healthy Los Angeles; Central City North Community Plan; LAMC; LADOT Vision Zero; Streetscape Plans; 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 five goals that define the City's mobility priorities:

1. 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.

2. 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.

3. 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.

4. Collaboration, Communication, and Informed Choices: The impact of new technologies on our day-to-day mobility standards 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.

5. 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.

The Mobility Plan further enumerates a variety of policies and programs in support of these goals. A detailed analysis of the Project's consistency with the applicable policies in the Mobility Plan is provided in Table IV.I-1 on page IV.I-31.

As previously described, the Mobility Plan identifies key corridors within the Study Area as components of various "mobility-enhanced networks," including the TEN, NEN, PED, and BEN/BLN. As provided in the Transportation Assessment, though no specific improvements have been identified adjacent to the Project Site or within the Study Area and, thus, there is no schedule for implementation of any improvements, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. As discussed above, in the vicinity of the Project Site, 6th Street and Central Avenue are part of the TEN; Mateo Street and Santa Fe Avenue are part of the NEN; 7th Street and Mateo Street north of 7th Street have been designated as part of the BLN; and Alameda Street south of 6th Street, 7th Street west of Mill Street, Mateo Street north of 7th Street, and 6th Street west of Alameda Street and east of Mill Street are identified as part of the PED As discussed further below and in Table IV.I-1, the Project would support the City's overarching objective of the mobility-enhanced networks to improve urban mobility.

The Mobility Plan also designates street and sidewalk width standards based on a street's functional classification. Adjacent to the Project Site, 6th Street is designated as an Avenue II, Mill Street as a Collector Street, and Alameda Street as an Avenue I in the Mobility Plan. As provided in the Transportation Assessment, sidewalk dedications along 6th Street and Mill Street would be required to meet their respective Mobility Plan designations. Alameda Street currently meets the Mobility Plan right-of-way standards for an Avenue I, and no dedications are required as part of the Project.

Table IV.I-1
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plana	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 applies to the City and not development projects, with the development of the Project, 6th Street and Mill Street along the Project Site frontage would be improved to provide adequate pedestrian safety and to satisfy the right-of-way and roadway standards to meet the goals and long-term needs of the Mobility Plan. The Project would improve existing curb cuts along the Project Site frontages by providing driveways designed and placed in accordance with current City standards for typical two-way operations to reduce interruptions to vehicle, bicycle, and pedestrian safety. Furthermore, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the number of driveways located along the bicycle lane on 6th Street would be reduced from eight to two. Therefore, the Project would not conflict with Mobility Plan Policy 1.1.
Policy 1.2 Complete Streets Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.	**No Conflict.** While this policy applies to the City and not development projects, the Project would conform to all design element requirements, including those related to proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility to reduce, if not totally avoid, any effects the safety and mobility of all users on-site and on the public rights-of-way. In addition, the Project would provide bicycle parking for employees and visitors, thereby promoting public and active transportation modes. The Project would support the mobility goals of the City and help facilitate pedestrian and bicycle accessibility by improving the safety and mobility of all users in the vicinity of the Project Site as provided above in Policy 1.1. Therefore, the Project would not conflict with Policy 1.2.
Policy 1.3 Safe Routes to Schools Prioritize the safety of school children on all streets regardless of highway classifications.	**No Conflict.** While this policy applies to the City and not development projects, the Project would not result in roadway modifications such that safety hazards would be introduced adjacent to the Project Site. In addition, the Project would improve existing curb cuts along the Project Site frontages by providing driveways designed and placed in accordance with current City standards for typical two-way operations to reduce interruptions to vehicle, bicycle, and pedestrian safety, thereby enhancing the safety of school children. Therefore, the Project would not conflict with Policy 1.3.
Policy 1.6 Multi-Modal Detour Facilities Design detour facilities to provide safe passage for all modes of travel.	**No Conflict.** Construction activities would be maintained on-site to the extent feasible. Any impediments to the public right-of-way would be addressed with implementation of the Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1. Therefore, the Project would not conflict with Mobility Plan Policy 1.6.

Table IV.I-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plana	Analysis of Project Consistency
Chapter 2: World Class Infrastructure	
Policy 2.1 Adaptive Reuse of Streets Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	**No Conflict.** While this policy applies to the City and not development projects, the Project would not alter adjacent streets or the right-of-way in a manner that would preclude or conflict with future changes by various City Departments. The Project would conform to all design element requirements, including those related to proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility to reduce, if not totally avoid, any effects on the public rights-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.1.
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 enhance pedestrian access within and around the Project Site by providing pedestrian connections and open-air pedestrian pathways between the various buildings on the Project Site for employees and guests. To enhance the pedestrian environment, the Project would improve sidewalks along the Project Site frontages to meet Mobility Plan standards, as well as removal and improvement of existing curb cuts to reduce vehicular-pedestrian conflicts to ensure pedestrian safety. The Project would provide separate pedestrian entrances from the vehicular driveways to the Project Site. The Project would include new landscaping along Alameda Street, 6th Street, and Mill Street including the planting of new trees, which would enhance the public realm and improve the pedestrian experience. The Project would also include ground floor retail and restaurant space, which would further enhance the pedestrian environment to provide a safe and comfortable walking environment. 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.** No streets adjacent to the Project Site are identified as part of the Mobility Plan's NEN. Within the Study Area, Mateo Street and Santa Fe Avenue have been designated as part of the NEN. While this policy applies to the City and not development projects, the Project is proposing pedestrian improvements along the Project Site frontages to meet the long-term mobility needs identified in the Mobility Plan. The Project would not alter Mateo Street and Santa Fe Avenue in a manner that would preclude or conflict with the City's plans to provide comfortable and safe routes for localized travel of slower-moving modes along these streets. 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.** 6th Street adjacent to the Project Site is identified as part of the TEN. The Project would not alter 6th Street in a manner that would preclude or conflict with the City's plans to improve the performance and reliability of existing and future bus service. In addition, the Project would encourage more transit use by developing a studio/office

Table IV.I-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plana	Analysis of Project Consistency
	project with convenient access to transit services, including Metro Lines 53 and 50 at the intersection of 7th Street and Central Avenue and Metro Lines 53 and 720 at the intersection of East 6th Street and Central Avenue, which would help to facilitate performance improvements and promote the reliability of existing and future bus service. Therefore, 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.** The Mobility Plan identifies 6th Street, adjacent to the Project Site, as part of the BEN, specifically calling for a Tier 1 Protected Bike Lane. While this policy applies to the City and not development projects, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure. Rather, the Project would reduce the number of driveways located along the bicycle lane on 6th Street from eight to two driveways to reduce vehicular-bicyclists conflicts. No other driveways would be located along a street with an existing bicycle facility. The Project would install a passenger loading area on 6th Street, which would be designed in compliance with LADOT's standards which would ensure that the Project would not preclude the City from future implementation of bicycle infrastructure, including the designation of 6th Street as a future Tier 1 Protected Bike Lane. In addition, the Project would comply with the LAMC and would provide 68 short-term and 105 long-term bicycle parking spaces. Therefore, the Project would not conflict with Mobility Policy Plan 2.6.
Policy 2.7 Vehicle Network Provide vehicular access to the regional freeway system.	**No Conflict.** Regional access to the existing freeway system is provided via several roadways within the Study Area, including 6th Street, 7th Street, and Alameda Street. The Project would not alter any of the surrounding streets, particularly those that provide regional access to and from the freeway system. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.
Policy 2.9 Multiple Networks Consider the role of each mode enhanced network when designing a street that included multiple modes.	**No Conflict.** Central Avenue and Alameda Street adjacent to the Project Site are part of multiple networks designated by the Mobility Plan. While this policy applies to the City and not development projects, the Project would provide and accommodate for the various modes of travel on the streets and minimize conflicts to prioritize safety as previously described above. In addition, the Project would not preclude any future improvements to the adjacent roadway network. Therefore, the Project would not conflict with Mobility Plan Policy 2.9.
Policy 2.10 Loading Areas Facilitate the provision of adequate on and off-street loading areas.	**No Conflict.** All proposed delivery drop-off/loading zones would be provided on-site, including loading for large trucks. The loading zones would be managed to facilitate safe loading operations and to limit vehicle queue spillovers into the travel

Table IV.I-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plana	Analysis of Project Consistency
	lanes on Mill Street. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.
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.** While this policy applies to the City and not development projects, 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, vehicular access to the Project Site would be condensed compared to existing conditions and would be provided from two large, gated driveways along 6th Street and two additional driveways on Mill Street to improve vehicular, pedestrian, and bicyclist conflicts and safety. In addition, while pedestrian access to the campus would not be available to the public, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity along those street frontages while maintaining essential security. Furthermore, the Project would incorporate streetscape improvements, including landscaping along the perimeter of the Project Site, which would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of a production studio. The Project would also provide bicycle parking spaces in accordance with LAMC requirements, which would promote the use of alternative modes of travel. Additionally, the Project Site is located in a TPA and is well-served by a variety of public transit options, including a number of local bus lines serviced by Metro and LADOT that provide connections to Downtown subway stations and regional bus lines serviced by Metro and Montebello Bus Line that provide connections to West Hollywood, CSU Dominguez Hills, Hawaiian Gardens, Compton, Montebello, Whittier, and Santa Monica. In addition, while located outside of the TPA, the Project Site is located within 0.85 miles of the Little Tokyo/Arts District Station serving the A and E lines and would be accessible to bicyclists and pedestrians. 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.** The Project would be designed to comply with ADA requirements. All street crossings adjacent to the Project Site, including those installed by the Project, would feature wheelchair-accessible curb cuts to provide direct connections to pedestrian amenities at adjacent intersections. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.

Table IV.I-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plana	Analysis of Project Consistency
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 develop a new production studio campus within the Arts District neighborhood of the City in proximity to other commercial, retail, and restaurant uses and neighborhood services. The Project would also provide employment opportunities to existing and future residents of the Arts District neighborhood. The Project and the surrounding mix of land uses would encourage ridesharing and use of alternative transportation modes to minimize vehicle trips. The Project would also support initiatives to create transit-oriented developments as it would be developed on an infill site adjacent to or near multiple transit services. Therefore, the Project would not conflict with 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 would be located near various bus stops serviced by local bus lines with frequencies of 15 minutes or less, as previously described above. Access to nearby bus stops would be maintained with safe and convenient paths of travel from the Project Site. In addition, the Project would not alter surrounding streets in a manner that would preclude or conflict with the City's plans to improve the performance and reliability of existing and future bus service Therefore, the Project would not conflict with 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 include a reduced parking supply and bicycle parking facilities. In addition, the Project Site is located near transit stops serviced by rail and bus lines, including Metro Line 53 and 50 at the intersection of 7th Street and Central Avenue and Metro Line 53 and 720 at the intersection of East 6th Street and Central Avenue. Furthermore, the Project Site is located within 0.85 mile of the Metro Little Tokyo/Arts District Station serving the A and E lines and would be easily accessible to bicyclists. These features would support multi-modal connectivity and access for transit riders. Therefore, the Project would not conflict with Mobility Plan Policy 3.5.
Policy 3.8 Bicycle Parking Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	**No Conflict.** The Project would provide short-term and long-term bicycle parking spaces in accordance with LAMC requirements throughout the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 4.5.
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 would encourage alternative modes of travel through its proximity to multiple transit services. Additionally, the Project would provide on-site bicycle parking and amenities as part of its TDM strategies to reduce the number of single occupancy vehicle trips to the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 4.8.

Table IV.I-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
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.** The Project would provide sufficient off-street parking to accommodate Project parking demand. No on-street parking would be provided adjacent to the Project Site on Alameda Street or 6th Street. 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.** While this policy applies to the City and not development projects, the Project would encourage sustainable transportation by providing on-site bicycle parking facilities and amenities and separate pedestrian entries, both of which would promote active transportation modes, such as biking and walking. Additionally, the Project would be located near transit stops serviced by rail and bus lines, including Metro Line 53 and 50 at the intersection of 7th Street and Central Avenue and Metro Line 53 and 720 at the intersection of East 6th Street and Central Avenue, as well as the Metro Little Tokyo/Arts District Station serving the A and E lines, thereby providing employees and visitors to the Project with public transportation alternatives. Therefore, the Project would not conflict with Policy 5.1.
Policy 5.2 Vehicle Miles Traveled (VMT) Support ways to reduce vehicle miles traveled (VMT) per capita.	**No Conflict.** It is estimated that the Project would generate lower work VMT per employee than the average for the area, as demonstrated below in the analysis of Threshold (b). Therefore, the Project would not conflict with this policy.
Policy 5.4 Clean Fuels and Vehicles Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.	**No Conflict.** The Project would provide EV parking and charging stations in accordance with applicable LAMC requirements to accommodate those who arrive in EVs. By providing this type of service, the Project would promote usage of EVs, which produce less GHG emissions compared to nonelectric vehicles. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.

[a] *Objectives, Policies, Programs, or Plans based on information provided in Mobility Plan 2035: An Element of the General Plan (Los Angeles Department of City Planning, January 2016).*

Source: Gibson Transportation, Eyestone Environmental, 2023.

As discussed in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site would be provided via two gated driveways along 6th Street (referred to as the West Gate and the East Gate) and two additional driveways on Mill Street. The Project's proposed four driveways would replace the existing 16 driveways located along the Project Site frontages and would provide distinct access points for the various uses of the Project. Reducing the number of driveways around the Project Site would improve vehicular-pedestrian and vehicular-bicyclist conflicts surrounding the Project Site. In addition, the

proposed driveways along 6th Street would prohibit left-turn ingress/egress in order to improve safety along an HIN-designated street. The proposed driveways would be designed and implemented in accordance with LADOT standards. The driveways anticipated to provide truck access also would be designed to adequately accommodate truck turning maneuvers without encroachment into the public right-of-way.

In addition to the above Project driveways, an emergency vehicle-only access would be located along the southern boundary of the Project Site with entrances on Alameda Street and Mill Street. Passenger loading areas would be provided on 6th Street and on Mill Street with separate pedestrian and bicycle access provided via entrances along Alameda Street, 6th Street, and Mill Street. Due to the unique security requirements of production studio campuses, pedestrian access to the campus would not be available to the general public. However, the proposed office buildings would include large lobbies at the ground level to enhance pedestrian activity along those street frontages while maintaining essential security. The Project would also be designed in compliance with ADA standards to provide accessibility for all patrons of the Project. As such, as provided in Table IV.I-1 on page IV.I-31, the Project would not conflict with the Mobility Plan policies related to roadway safety as the Project would be designed and operated to prioritize the safety of all users.

As further discussed in Table IV.I-1, the Project would provide sufficient off-street parking to satisfy the Project's parking demand. Secured bicycle parking facilities within the Project Site would also be provided in accordance with LAMC requirements, which would promote active transportation modes, such as biking, thereby reducing the Project VMT per employee compared to the average for the area. Furthermore, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project would reduce the number of vehicular driveways on 6th Street from eight to two to reduce vehicular-bicyclists conflicts.

As detailed in Table IV.I-1 and as concluded in the Transportation Assessment, the Project's proposed land uses and design features, including site access; pedestrian, bicycle, and transit accessibility; and loading areas, would not conflict with the policies of the Mobility Plan. In addition, the Project would not conflict with the implementation of future projects in the public right-of-way adjacent to the Project Site. Overall, the Project would not conflict with the applicable policies of the Mobility Plan.

(b) Plan for a Healthy Los Angeles

A detailed analysis of the Project's consistency with the applicable policies in the Plan for a Healthy Los Angeles is provided in Table IV.I-2 on page IV.I-38. In summary, the Project prioritizes safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities at adjacent intersections. Furthermore, the Project would support healthy lifestyles by locating jobs near

Table IV.I-2
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.	**No Conflict.** The Project would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities at adjacent intersections. In addition, the Project would support healthy lifestyles by locating jobs near public transit, providing bicycle parking, and enhancing the pedestrian environment by providing landscape elements for a more comfortable environment for pedestrians along Alameda Street, 6th Street, and Mill Street. Therefore, the Project would not conflict with Plan for a Healthy Los Angeles Policy 1.5.
Policy 1.7 Displacement and Health Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.	**No Conflict.** The Project would revitalize the Project Site through the development of a new production studio campus that can provide employment and entrepreneurial opportunities to existing residents of the Arts District neighborhood and support local small businesses. Therefore, the Project would not conflict with Policy 1.7.
Chapter 2: A City Built for Health	
Policy 2.1 Access to Goods and Services Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.	**No Conflict.** The Project would provide employment and entrepreneurial opportunities in the Arts District neighborhood through the development of production studio-related uses and office space. Therefore, the Project would not conflict with Policy 2.1.
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.	**No Conflict.** VMT directly contributes to GHG emissions; therefore, a reduced VMT per capita also reduces GHG per capita. It is estimated that the Project would generate lower work VMT per employee than the average for the area, as demonstrated below in the analysis of Threshold (b). The Project would also incorporate several design features to reduce the number of single occupancy vehicle trips to the Project Site. Specifically, the Project would provide 68 short-term and 105 long-term bicycle parking spaces in accordance with LAMC requirements and a reduced parking supply that would reduce the amount of employees and visitors of the

Table IV.I-2 (Continued)
Project Consistency With Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
	Project Site and subsequently reduce the number of SOV trips to and from the Project Site. Accordingly, the Project would contribute to the improvement of air quality and decreased air pollution. Therefore, the Project would not conflict with Plan for a Healthy Los Angeles policy 5.7.

[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: Gibson Transportation, Eyestone Environmental, 2023.

public transit, providing bicycle parking, and enhancing the pedestrian environment by providing landscape elements for a more comfortable environment for pedestrians along Alameda Street, 6th Street, and Mill Street. The Project would also promote healthy living by encouraging active travel modes and would generate lower VMT per capita for employees than the average for the area, thus reducing air pollutants. Therefore, the Project would not conflict with the applicable policies of the Plan for a Healthy Los Angeles.

(c) Central City North Community Plan

A detailed analysis of the Project's consistency with the applicable transportation-related policies of the Central City North Community Plan is provided in Table IV.I-3 on page IV.I-40. As discussed therein, the Project would provide employment opportunities in an area characterized by industrial and warehouse uses that are located in close proximity to various transit options, including several Metro bus lines as well as the Metro Little Tokyo/Arts District Station serving the A and E lines. The Project's proximity to transit and bicycle facilities designated along 6th Street would encourage alternative modes of transportation for employees and visitors to travel to and from the Project Site, supports the continued use of the existing transit system, and facilitates future development opportunities of the transit system. Thus, as detailed in Table IV.I-3, the Project promotes and encourages development consistent with the transportation-related goals and objectives of the Central City North Community Plan.

Table IV.I-3
Project Consistency With Central City North Community Plan

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
Goal 10: Develop a public transit system that improves mobility with convenient alternatives to automobile travel. **Objective 10-1:** To encourage improved local and express bus service through the Central City North community and encourage park-and-ride facilities to interface with freeways, high occupancy vehicles (HOV) facilities and rail facilities. **Policy 10-1.1:** Coordinate with the MTA to improve local bus service to and within the Central City North community and on a Bus Restructuring Program for the area. **Policy 10-1.2:** Encourage the provision of safe, attractive and clearly identifiable transit stops with user friendly design amenities. **Policy 10-1.3:** Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled persons, and the transit dependent population.	**No Conflict.** While this policy applies to the City and not development projects, the Project would encourage more transit usage by developing a studio/office project with convenient access to bus transit services as well as the Metro Little Tokyo/Arts District Station serving the A and E lines located within 0.85 miles of the Project Site. Furthermore, the Project would enhance the pedestrian environment with landscaping and a reduction in the number of driveways around the Project Site, which would improve connectivity to transit for employees, visitors, and neighbors (including seniors, disabled persons, etc.) by reducing vehicular-pedestrian and vehicular-bicyclist conflicts. Therefore, the Project would not conflict with this goal, objective, or policies.
Goal 11: A well maintained, safe, efficient freeway and street network. **Objective 11-1:** That signalized intersections are integrated with the City's ATSAC system by the year 2010. **Policy 11-1.1:** Install ATSAC equipment at an accelerated rate with expanded funding. **Policy 11-1.2:** Support the existing Department of Transportation program to provide separate right and/or left turn lanes on arterial streets, where feasible. **Policy 11-1.3:** Accelerate controller replacement to upgrade and improve signal efficiency.	**No Conflict.** The City completed integration of the ATSAC system at signalized intersections in 2013. While this policy applies to the City and not development projects, the Project would not preclude LADOT from making any further changes to traffic signal controllers or installing separate right- and/or left-turn lanes on arterial streets. Therefore, the Project would not conflict with this goal, objective, or policies.
Goal 12: Encourage alternative modes of transportation to the use of single occupant vehicles (SOV) in order to reduce vehicular trips. **Objective 12-1:** To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips. **Policy 12-1.1:** Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e.,	**No Conflict.** The Project would encourage the use of alternative modes of transportation over the use of SOV to reduce vehicle trips by providing on-site bicycle parking facilities and amenities and separate pedestrian entries, both of which would promote biking and walking. Additionally, the Project would be located near transit stops serviced by rail and bus lines, including Metro Line 53 and 50 at the intersection of 7th Street and Central Avenue and Metro Line 53 and 720 at the intersection of East 6th Street and Central Avenue, as well as the Metro Little Tokyo/Arts District Station serving the A and E lines providing employees and visitors to the Project with

Table IV.I-2 (Continued)
Project Consistency With Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
carpools, vanpools, buses, flex time, bicycles, and walking, etc.) **Policy 12-1.2:** Encourage the use of multiple-occupancy vehicle programs for shopping and other activities to reduce midday traffic. **Policy 12-1.3:** Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City. **Policy 12-1.4:** TDM measures in Central City North should be consistent with adopted City policy.	public transportation alternatives. Therefore, the Project would not conflict with this goal, objective, or policies.
Goal 13: A system of safe, efficient and attractive bicycle and pedestrian facilities. **Objective 13-1:** To promote an adequate system of bikeways for commuter, school, and recreational use. **Policy 13-1.1:** Plan for and encourage funding and construction of bicycle facilities connecting residential neighborhoods to schools, open space areas, and employment centers. **Policy 13-1.2:** Identify bicycle facilities along arterials in the community. **Policy 13-1.3:** Assure that local bicycle facilities are linked with the facilities of neighboring areas of the City. **Policy 13-1.4:** Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places.	**No Conflict.** While this policy applies to the City and not development projects, the Project would include 173 bicycle parking spaces inclusive of 68 short-term and 105 long-term bicycle parking spaces. As previously discussed, the Project Site is located along Class II bicycle lanes on 6th Street, which provide access from across the 6th Street Viaduct into the Arts District. The lanes improve connectivity between the residential, commercial, industrial, recreational, and institutional uses nearby. The Project would not involve removal or alteration of the bicycle lanes. Furthermore, 6th Street is designated as a future Tier 1 Protected Bike Lane in the Mobility Plan. The Project would install a passenger loading area on 6th Street that would be designed in compliance with LADOT's standards, which would ensure that the Project would not preclude the City from future implementation of bicycle infrastructure. Therefore, the Project would not conflict with this goal, objective or policies.
Objective 13-2: To promote pedestrian oriented mobility and the utilization of the bicycle for commuter, school, recreational use, economic activity, and access to transit facilities. **Policy 13-2.1:** Encourage safe utilization of easements and/or rights-of-way along flood control channels, public utilities, railroad rights-of-way, and streets wherever feasible for the use of bicycles and/or pedestrians. **Policy 13-2.2:** Require the installation of sidewalks with all new roadway construction and significant reconstruction of existing roadways.	**No Conflict.** While this policy applies to the City and not development projects, the Project would include 173 bicycle parking spaces inclusive of 68 short-term and 105 long-term bicycle parking spaces. In addition, to promote pedestrian-oriented mobility, the Project would include separate pedestrian entries, reduce the number of driveways around the Project Site to minimize vehicular-pedestrian conflicts, and include pedestrian-friendly landscaping surrounding the Project Site to improve the streetscape. Additionally, the Project would be located near transit stops serviced by rail and bus lines providing employees and visitors to the Project with public transportation alternatives. Therefore, the Project would not conflict with this objective or policies.

Table IV.I-2 (Continued)
Project Consistency With Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
Goal 14: A sufficient system of well-designed and convenient on-street parking and off-street parking facilities throughout the Plan area. **Objective 14-1:** To provide parking in appropriate locations in accord with Citywide standards and community needs. **Policy 14-1.1:** Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto the arterial. **Policy 14-1.2:** New parking lots and garages shall be developed in accordance with design standards.	**No Conflict.** The Project would provide sufficient off-street parking to accommodate the proposed uses. Vehicular access to the Project Site would be provided from two gated driveways along 6th Street and two driveways on Mill Street. With completion of the Project, the total number of driveways serving the Project Site would be reduced from 16 driveways to four, which would reduce conflict points along arterial streets. The design of the driveways and parking areas would comply with LADOT standards. Therefore, the Project would not conflict with this goal, objective, or policies.

[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: Gibson Transportation, Eyestone Environmental, 2023.

(d) Draft Downtown Los Angeles Community Plan

The Draft Downtown Los Angeles Community Plan has been adopted but has not yet become effective. Following adoption of the implementing ordinances, the Draft Downtown Los Angeles Community Plan will be brought into effect. Thus, the information provided herein is for informational purposes only. A detailed analysis of the Project's consistency with the 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, the Downtown Plan Area 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:

- 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 by providing a new production studio campus at a site located within 0.5 mile of numerous Metro bus stops, including Metro Line 53 and 50 at the intersection of 7th Street and Central Avenue and Metro Line 53 and 720 at the intersection of East 6th Street and Central Avenue, as well as within 0.85 miles of the Metro Little Tokyo/Arts District Station serving the A and E lines. The Project's location within a dense neighborhood and in close proximity to a variety of transit options would expand equitable access to employment opportunities and provide employees and visitors to the Project Site options for alternative modes of transportation. The Project would include new landscaping inclusive of street trees, shrubs, lighting, and wayfinding signage along Alameda Street, 6th Street, and Mill Street. Along Alameda Street and Mill Street, proposed landscaped areas would add to the available public open space. The proposed streetscape improvements would better connect and orient people toward destinations and activity centers and enhance the visual character of the neighborhood.

As previously discussed, the Project would (1) provide TDM measures, including a permissibly reduced parking supply and 68 short-term and 105 long-term bicycle parking spaces in accordance with LAMC requirements, and (2) encourage pedestrian activity by incorporating streetscape improvements inclusive of new landscaping along Alameda Street, 6th Street, and Mill Street, as well as providing large lobbies within the proposed office buildings at the ground-level to enhance the public realm while maintaining essential security. The reduced parking supply, provision of bicycle parking spaces, and pedestrian improvements would serve to reduce the number of vehicle trips to the Project Site. Therefore, the Project would not conflict with the Draft Downtown Los Angeles Community Plan.

(e) LAMC

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

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. The Project's bicycle parking requirement is 68 short-term and 105 long-term spaces, which the Project would provide. Accordingly, the Project would meet the LAMC requirements for on-site bicycle parking supply.

(ii) LAMC 12.26 J (TDM Ordinance)

LAMC Section 12.26 J establishes TDM requirements for projects with at least 25,000 square feet of non-residential floor area, such as the Project. Key requirements of the TDM Ordinance as applied to the Project include providing carpool/vanpool loading areas, walkways between buildings, and public sidewalks. The Project would provide pedestrian connectivity both within and surrounding the Project Site with walkways between buildings on all sites. As previously discussed, the Project would also incorporate TDM measures for visitors and employees, including a permissibly reduced parking supply, as well as 68 short-term and 105 long-term bicycle parking spaces in accordance with LAMC requirements. Therefore, the Project would not conflict with the TDM Ordinance.

(f) Vision Zero Corridor Plans

As discussed above, 6th Street is identified as part of the High Injury Network (HIN). The Project proposes to eliminate six of the existing driveways along 6th Street and reconfigure two driveways for vehicular access on 6th Street. In consultation with LADOT, these driveways were restricted to right-turn ingress/egress only in order to reduce conflict points between vehicles, pedestrians, and bicyclists. Additionally, the Project would install a passenger loading area on 6th Street, which would be designed in compliance with LADOT's standards, ensuring that the Project would not preclude the City from future implementation of bicycle infrastructure. While vehicles utilizing the loading area may need to cross the bicycle lane on 6th Street, the Project would result in less overall conflict points with the bicycle lane due to the reduction in the amount of driveways along 6th Street, which is identified as part of the HIN. Currently, no Vision Zero safety improvements are planned along 6th Street. Nonetheless, the Project improvements to the pedestrian environment would not preclude the City from implementing any Vision Zero safety improvements along 6th Street. Therefore, the Project would not conflict with Vision Zero.

(g) Streetscape Plans

None of the City's established Streetscape Plans would affect the Project Site and, therefore, streetscape plans do not apply to the Project.

(h) Citywide Design Guidelines

The Pedestrian-First Design approach of the 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." 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 design includes accessible sidewalks, pedestrian amenities, and well-designed vehicular access driveways in accordance with the City's design guidelines. The Project would incorporate streetscape improvements that would enhance the public realm and improve the pedestrian experience. Specifically, the Project would include new landscaping, such as street trees and shrubs, lighting, and wayfinding signage along Alameda Street, 6th Street, and Mill Street. The proposed office buildings would include large lobbies at the ground-level to enhance pedestrian activity while maintaining essential security. Additionally, all vehicular access points would be separate from the pedestrian and bicycle access points. Furthermore, the Project proposes to eliminate six of the existing driveways along 6th Street and reconfigure two driveways for vehicular access on 6th Street, which would minimize pedestrian and vehicular conflicts. Therefore, the Project would not conflict with the transportation-related Citywide Design Guidelines.

Refer to Section IV.F, Land Use and Planning, of this Draft EIR, for additional analysis of the Project's consistency with the Citywide Design Guidelines.

(i) Other Plans and Policies

As discussed in detail in Section IV.F, Land Use and Planning, of this Draft EIR, the Project would not conflict with 2020–2045 SCAG RTP/SCS policies related to encouraging pedestrian activity and reducing VMT. As indicated therein, the Project would improve mobility and accessibility, encourage transit use, and reduce VMT and GHG emissions. These would be achieved by intensifying urban density within a TPA and an HQTA in close proximity to transit and destinations; providing complementary new uses (i.e., creative office, production) in close proximity to existing residential, retail, and restaurant uses; providing pedestrian and bicycle improvements; providing EV charging stations; implementing TDM measures; supporting healthy and equitable communities by encouraging walking and bicycling; providing EV charging stations; providing public realm improvements (i.e., new street trees, native grasses and shrubs, bicycle parking and supporting amenities, etc.); and incorporating sustainability features Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards, which would support resource efficiency by conserving water and energy.

(j) Conclusion

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

(2) Mitigation Measures

Project-level impacts related to a conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to a conflict with a program, plan, ordinance, or policy addressing the circulation 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, 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 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 and is subject to the LADOT threshold 7.6 work VMT per employee for determining VMT impacts.

As detailed in the Transportation Assessment, the Project would result in an estimated 3,815 daily vehicle trips and a total 27,985 daily VMT. This would result in a daily work VMT per employee of 5.5, which would be below the threshold of significance for the Central APC of 7.6 work VMT per employee. Thus, the Project would not result in a significant impact with respect to work VMT per employee as estimated by the VMT Calculator. **Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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

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

As evaluated in the Initial Study for the Project, included as Appendix A of this Draft EIR, the Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). In addition, the proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access such that the proposed driveways would not create hazards to the surrounding streets. Thus, as determined in the Initial Study included in Appendix A of this Draft EIR, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts were determined to be less than significant.

(b) Freeway Safety Analysis

As discussed above in the Methodology subsection, the City's Freeway Guidance 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 identified in the Transportation Assessment, the Project would add 25 or more peak-hour trips to the following off-ramps during the morning and afternoon peak hours:

- I-10 Eastbound Off-Ramp to Porter Street
- I-10 Westbound Off-Ramp to Mateo Street/Enterprise Street
- I-10 Westbound Off-Ramp to 8th Street

As detailed in the Transportation Assessment, as these intersections fall outside the Study Area, additional historical counts from 2015 were utilized for two of the three intersections. For the third intersection, traffic volumes were extrapolated from a 2022 traffic count at the nearby intersection of Mateo Street and 8th Street and from Caltrans off-ramp count data from 2015.

In accordance with the Freeway Guidance, the 95th percentile ramp queue was calculated using the Highway Capacity Manual (HCM) methodology. Conditions were analyzed for the anticipated Project buildout year of 2026, which include growth and traffic from related projects, both without and with Project traffic. As detailed in the Transportation Assessment, under Future with Project conditions, the queues at the three off-ramps identified above would not exceed the ramp storage length during any of the analyzed peak hours and would not be subject to a speed differential analysis. The queues at the three off-ramps would not extend onto the freeway mainline and would not result in a significant safety constraint. **Thus, impacts related to hazardous geometric design features associated with freeway safety would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to hazardous geometric design features associated with freeway safety would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Project-level impacts related to hazardous geometric design features associated with freeway safety were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant without mitigation.

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

(1) Impact Analysis

(a) Construction Impacts

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 in the vicinity of the Project Site as a result of construction activities along the surrounding roadways. Specifically, as described in the Transportation Assessment, included as Appendix I of this Draft EIR, the Project-adjacent parking lane and sidewalks along Alameda Street, 6th Street, and Mill Street

may be affected by construction activities or the staging of construction materials and equipment. 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, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, as part of the Construction Traffic Management Plan included as Project Design Feature TRA-PDF-1, construction-related deliveries and haul trips would be scheduled to occur outside the commuter peak hours to the extent feasible, thereby reducing the effect on traffic flow on surrounding streets. 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. **Therefore, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.**

(b) Operational Impacts

As described above, vehicular access to the Project Site would be provided from two gated driveways along 6th Street and two additional driveways on Mill Street. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operation of the Project. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Based on the above, Project operation would not result in inadequate emergency access, and impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

(a) Consistency with Transportation Plans and Policies

In accordance with the TAG, the cumulative analysis of consistency with transportation plans and policies must include consideration of the related projects within 0.5 mile of the Project Site and any transportation system improvements in the vicinity of the Project Site. As shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, a total of 22 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., 2026) for purposes of the traffic analysis.

The majority of the programs, plans, policies, and ordinances reviewed above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21 A.16 and the TDM Ordinance from LAMC Section 12.26 J apply to projects individually. Also, in many cases, the Project would specifically support key policies (such as enhancing pedestrian infrastructure), while many of the nearby related projects would neither support nor interfere with such policies. In addition, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Lastly, as indicated in the Project-level analysis under Threshold (a) above, the Project would not result in significant inconsistencies with applicable transportation programs, plans, policies and ordinances. **Therefore, cumulative impacts of the Project with respect to conflicts with transportation-related programs, plans, policies, and ordinances 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 2020–2045 RTP/SCS as indicated in the Project-level analysis under Threshold (a) above (Refer to Section IV.F,

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 VMT would be less than significant.**

(c) Hazardous Design Features

According to the TAG, a cumulative impact analysis for potential geometric design or land use hazards should consider the effect of access to related projects in the same block as the Project Site. Related Project No. 2, which is located at 1340 E. 6th Street immediately across Mill Street from the Project Site, is located on the same block as the Project. Related Project No. 2 is an existing building that would be converted from manufacturing to apartments. As part of the conversion, the existing non-compliant driveway along Mill Street would be updated to meet LADOT standards for driveways. Thus, potential conflict points between vehicles and pedestrians, bicycles, or other vehicles would be reduced, making a safer environment for all road users. In addition, as discussed in the Project-level analysis under Threshold (c) above, the Project would not itself result in a significant impact associated with hazardous geometric design features associated with freeway safety. **Therefore, the cumulative impacts of the Project with respect to hazardous geometric design features, including safety, operational, or capacity impacts, would be less than significant.**

(d) Emergency Access

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. As previously discussed, under Related Project No. 2, the existing non-compliant driveway along Mill Street would be updated to meet LADOT standards for driveways. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites, including the proposed driveway modification as part of Related Project No. 2, would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and inspection for new construction projects, as set forth in 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 Study Area 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. **Therefore, the cumulative impacts of the Project with respect to emergency access would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related to the consistency with adopted plans, programs, ordinances, and policies; VMT; hazardous geometric design features; and 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.