

## **IV. Environmental Impact Analysis**

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### **K. Transportation**

#### **1. Introduction**

This section analyzes the Project's potential impacts on transportation. This section is primarily based on the 2159 Bay Street Project Transportation Assessment<sup>1</sup> (Transportation Assessment) prepared for the Project and included in its entirety in Appendix M of this Draft EIR. The Transportation Assessment follows the July 2019 Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG), and updated July 2020, which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated CEQA guidelines from the State of California that require transportation impacts be evaluated based on vehicle miles traveled (VMT) rather than level of service (LOS).

The analysis of Vehicle Miles Traveled (VMT) in the Transportation Assessment was prepared pursuant to LADOT's Transportation Assessment Guidelines (July 2020) 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 transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment, including the VMT analysis, was approved by LADOT on October 8, 2020. A copy of LADOT's Assessment Letter for the Transportation Assessment is included in Appendix M of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

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

- Americans with Disabilities Act of 1990

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<sup>1</sup> *The Mobility Group, 2159 Bay Street Project Transportation Assessment, July 2020.*

- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035
- Central City North Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Citywide Design Guidelines
- Plan for a Healthy Los Angeles
- Los Angeles River Design Guidelines

## (1) Federal

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

Titles I, II, III, and V of the American 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 Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

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

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

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

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

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

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

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

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

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

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



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

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

(e) *CEQA Guidelines Section 15064.3*

As discussed above, recent changes to the CEQA include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop<sup>2</sup> or a stop along an existing high-quality transit corridor<sup>3</sup> should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has the 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

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

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

VTM Calculator Version 1.3 (May 2020) (VTM Calculator) to estimate project-specific daily household VTM per capita and daily work VTM per employee for developments within City limits. The methodology for determining VTM based on the VTM Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

### (3) Regional

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

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

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG’s prior 2016–2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high-quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for four percent of SCAG’s total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a 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 that capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

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

#### (4) Local

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

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

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

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

Street classifications are designated in the Mobility Plan, and may be amended by a Community Plan, and are intended to create a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments,

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

bicycle routes, building design and site access, etc. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows:

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

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: 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 Central City North Community Plan<sup>5</sup> (Community Plan) was adopted in 2000 and amended in 2016 as part of the Mobility Plan 2035 Update. While an updated Community Plan is currently under development in concert with an update to the Central City Community Plan (together known as the DTLA 2040 Plan—discussed further below), the Community Plan from 2016 is currently in effect. The Community Plan includes transportation-related goals, objectives and policies in Chapter III, Land Use Plan Policies and Programs, as listed below.<sup>6</sup> These objectives, policies, and programs, as well as design policies included in the Urban Design chapter, are focused on enhancing the pedestrian environment and reducing VMT.

- 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., carpools, vanpools, buses, flex time, bicycles, and walking, etc.).
- 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 City policy.
- Policy 13-1.4: Encourage the provision of changing rooms, showers, and bicycle storage at new and existing non-residential developments and public places.

<sup>5</sup> *City of Los Angeles, Central City North Community Plan, adopted December 15, 2000, Amended September 7, 2016.*

<sup>6</sup> *Note that Project consistency with each of these goals, objectives and policies is evaluated in Table 4 of the Land Use Consistency Analysis Tables included as Appendix I of this Draft EIR. As indicated therein, the Project would be consistent with these goals, objectives and policies.*

Additionally, a Transportation Improvement and Mitigation Plan (TIMP), was prepared for the Community Plan through an analysis of the land use impacts on transportation. The TIMP establishes a program of specific measures which are recommended to be undertaken during the life of the Community Plan.

*(i) Central City Community Plan Update (DTLA 2040 Plan)*

The City of Los Angeles Department of City Planning is currently updating the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles, in a combined planning process referred to as the DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth.<sup>7</sup> Specifically, the following core principles represent the long-term priorities for the DTLA 2040 Plan:

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

The DTLA 2040 Plan will inform developers and homeowners of allowable development options, densities, and intensities, outline strategies for how to accommodate planned growth, and bring the Central City North Community Plan up-to-date as an improved planning tool. The DTLA 2040 Plan process began in 2014, and a public scoping meeting was held in February 2017 to collect comments from agencies and the public. The Draft DTLA 2040 Plan was released in June 2019 and followed by a series of open houses held by DCP in November. A Draft EIR regarding the DTLA 2040 Plan is anticipated to be released in 2020 and was followed by a public comment period. Subsequently, a virtual

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<sup>7</sup> Los Angeles Department of City Planning, *Downtown Community Plan Update*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed September 15, 2021.

public hearing was held on December 8, 2020. A meeting with the City Planning Commission (CPC) was held on June 17, 2021, at which CPC voted to reconvene a second meeting on August 26, 2021. At the August 26, 2021 CPC meeting, Commissioners voted to continue deliberation of the Community Plan and new Zoning Code to September 23, 2021. At the September 23, 2021 CPC meeting, the CPC recommended approval of the DTLA 2040 Plan and new Zoning Code.<sup>8</sup>

*(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 lot in any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or RD3 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

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<sup>8</sup> Los Angeles Department of City Planning, *Downtown Community Plan Update*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed January 21, 2022.

square feet of gross floor area. The TDM requirements set forth therein vary depending upon the maximum non-residential gross floor area described above, and include measures such as the provision of a bulletin board, display case, or kiosk with transit information and carpool/vanpool parking spaces.

*(d) LADOT Transportation Assessment Guidelines*

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on VMT, pursuant to State CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the Transportation Assessment Guidelines (TAG) that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including 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 has been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.<sup>9</sup>

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

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

*(f) Vision Zero*

The Vision Zero Los Angeles program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero Los Angeles has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025.

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<sup>9</sup> Los Angeles Department of Transportation, *Transportation Assessment Guidelines*, July 2020.



In order to achieve these goals, LADOT identified a network of streets, called the High Injury Network, which has a higher incidence of severe and fatal collisions. The High Injury Network, which was last updated in 2018, represents 6 percent of the City's street miles but accounts for approximately two-thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

*(g) Interim Guidance for Freeway Safety*

In May 2020, LADOT issued Interim Guidance for Freeway Safety Analysis (City Freeway Guidance) identifying City requirements for a CEQA safety analysis of Caltrans facilities as part of a transportation assessment.<sup>10</sup> The City Freeway Guidance relates to the identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

*(h) Citywide Design Guidelines*

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

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.<sup>11</sup> The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

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<sup>10</sup> Los Angeles Department of Transportation, *Interim Guidance for freeway Safety Analysis*, May 2020.

<sup>11</sup> City of Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*, 2015.

*(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, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program. The RIO District Ordinances establish landscaping, design criteria, and administrative review procedures for projects within the RIO District.<sup>12</sup> The Los Angeles River Design Guidelines complement the Los Angeles River Revitalization Master Plan and builds on the original draft Los Angeles River Design Guidelines from July 2015.<sup>13</sup>

## **b. Existing Conditions**

### **(1) Study Area**

As shown in Figure IV.K-1 on page IV.K-15, the Project's Study Area includes a geographic area approximately 0.25 mile from the Project Site, as required by LADOT TAG. The Study Area was established in consultation with LADOT and the City, based on the above criteria with a review of the Project's peak-hour vehicle trip generation and the anticipated distribution of the Project's vehicular traffic.

### **(2) Roadway System**

#### *(a) Freeways*

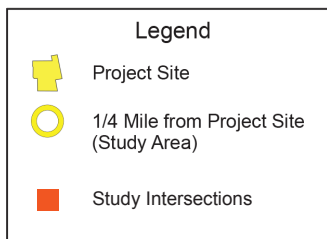
The Project Site is located in the Arts District of Downtown Los Angeles, which is served by an extensive freeway network. Primary regional arterials within the vicinity of the site are Santa Monica Freeway (I-10), the Santa Ana Freeway (US-101) and the Golden State Freeway (I-5). The I-10 westbound on/off-ramps are located approximately 0.3 miles from the Project Site on 8th Street west of Santa Fe Avenue, and the I-10 eastbound

<sup>12</sup> 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.

<sup>13</sup> City of Los Angeles, LA River Design Guidebook: Boyle Heights, Arts District, Lincoln Heights, Chinatown East, 2016.



Note: Quarter mile boundary is a composite from each edge of project site



**Figure IV.K-1**  
Transportation Study Area

on/off-ramps are located 0.5 miles away on Porter Street west of Santa Fe Avenue. Additionally, an I-5 NB off-ramp, I-5 SB on-ramp, and US-101 SB Off-ramp are located approximately 0.8 miles away on 7th Street to the northeast of Project Site. See Figure 1.7 of the Transportation Assessment for the location of these freeway ramps including routes to/from the Project Site.

### *(b) Streets*

The key surface streets serving the two-block radius of the Project are 7th Street, and 8th Street in the east-west direction, and Mateo Street and Santa Fe Avenue in the north-south direction. Local streets directly serving the Project Site are Bay Street and Sacramento Street. Other local circulation streets in the area include Violet Street. Figures 1.1 and 1.2 of the Transportation Assessment show the street classifications and street designations from the Mobility Plan 2035, respectively. 7th Street and Santa Fe Avenue are classified as Avenue II, Mateo Street is an Avenue III, and Violet Street, Bay Street, Sacramento Street, and 8th Street are Collector Streets. Table 1.1 of the Transportation Assessment lists the street characteristics within the vicinity of the Project including number of lanes, direction of flow, peak period tow-away lanes, and bike lanes.

In addition, based on Mobility Plan 2035, the Project would have the following requirements for adjacent streets:

- Bay Street—Per the Mobility Plan 2035, the required dimensions are a 33-foot half right-of-way, a 20-foot half roadway, and a 13-foot sidewalk. Under existing conditions, Bay Street immediately adjacent to the Project Site includes a 30-foot half right-of-way and a 30-foot half roadway with no sidewalk.
- Sacramento Street—Per the Mobility Plan 2035, the required dimensions are a 33-foot half right-of-way, a 20-foot half roadway, and a 13-foot sidewalk. Under existing conditions, Sacramento Street immediately adjacent to the Project Site includes a 30-foot half right-of-way, a 20-foot half roadway, and a 10-foot sidewalk.

### **(3) Transit Service**

The Project Site is located within a City-designed Transit Priority Area (TPA) as defined by ZI File No. 2452 within.<sup>14</sup> TPAs are areas within one-half mile of a major existing or planned transit stop. Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional public bus lines, several of which provide

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<sup>14</sup> City of Los Angeles Department of City Planning, *Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 2159 East Bay Street*, <http://zimas.lacity.org>, accessed November 21, 2021.



connections to Downtown subway stations, including the Los Angeles County Metropolitan Transit Authority (Metro) Red and Purple Lines Pershing Square Station and the Metro Red, Purple, Blue, and Expo Lines 7th Street/Metro Center Station. In particular, Metro provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, approximately 580 feet northwest of the Project Site. A total of two other bus lines, local lines Metro 18, and Metro 62 have stops within a quarter mile of the Project Site. Metro Local Line 66 and Metro Rapid Line 720 currently serve the Project Site via stops located within approximately a half mile along Alameda Street/7th Street, and Olympic Boulevard. Additionally, the Greyhound Bus Terminal is located northwest of the Project Site on 7th Street, which provides private inter-city bus service to various locations outside of the Los Angeles area. Table 1.2 of the Transportation Assessment lists the individual bus lines serving the Study Area and indicates the frequency of service (headways) during the morning and evening peak periods. Figure 1.3 of the Transportation Assessment depicts the transit service.

#### (4) Existing Site Access

The Project is located adjacent to dead-ends on Bay Street and Sacramento Street. To the east of the dead-ends are the Burlington Northern Santa Fe (BNSF) railway tracks. As such, both streets provide access only to adjacent uses without through traffic, and there are no existing pedestrian or bicycle connections nor the opportunity for any future connections to the east of the Project Site.

Under existing conditions, there is no curb on Bay Street adjacent to the Project Site. There are no existing curb spaces being used for bike corral, car-sharing, parklet, electric vehicle charging, loading zone, or curb extension.

#### (5) Bicycle Facilities

##### *(a) Bicycle Facilities*

Mobility Plan 2035 designates bicycle lanes within the Project vicinity as Tier 1, 2, and 3. Tier 1 Bicycle Lanes are bicycle facilities on arterial roadways with physical separation. Tier 2 and Tier 3 Bicycle Lanes are bicycle facilities on arterial roadways with striped separation. Bicycle routes that are identified for bike use and include street signage to alert drivers that bicyclists are sharing the roadway spaces; often identified with the use of shared lane markings, or “sharrows,” painted on the street.

There are no bicycle lanes/routes currently in the Study Area. However, as shown for the Study Area in Figure 1.6 of the Transportation Assessment, the Mobility Plan 2035 has designated 7th Street as a Tier 2 bike lane for future implementation.

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*(b) Metro Bike Share*

There is one existing Metro Bike Share station at the intersection of Imperial Street and 7th Street, as shown in Figure 1.5 of the Transportation Assessment.

## **(6) Pedestrian Facilities**

The Project Site is located in the Arts District, which is an area with numerous local streets that do not have sidewalks, and with some streets that are uncurbed where vehicles and pedestrians share roadway space. The arterial streets predominantly have developed pedestrian facilities including sidewalks and crosswalks. Adjacent to the Project Site, there is currently a 10-foot sidewalk on Sacramento Street and no sidewalk on Bay Street. The closest signalized pedestrian crossings to the Project Site are located at Santa Fe Avenue and 8th Street south of the Project Site, and Santa Fe Avenue and 7th Street north of the Project Site.

## **(7) High Injury Network Facilities**

The Project is not located on a High Injury Network street, and no High Injury Network streets are located within the 0.25-mile radius Transportation Assessment Study Area identified in Figure IV.K-1 on page IV.K-15.

The following streets located within an approximately one-mile radius of the Project Site have been identified in LADOT's High Injury Network: Santa Fe Avenue (between Olympic Boulevard and Hunter Street), Olympic Boulevard (between S. Lorena Street westward), Alameda Street (between Olympic Boulevard and 6th Street), Soto Street north of Olympic Boulevard, S. Central Avenue, 7th Street west of Mateo Street, and 6th Street west of Mateo Street. The closest such street to the Project Site is 7th Street at Mateo Street, approximately 0.3 mile to the northwest.<sup>15</sup>

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

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<sup>15</sup> City of Los Angeles, City of Los Angeles GeoHub, High Injury Network Map, <https://geohub.lacity.org/datasets/ladot::high-injury-network-2/explore?location=34.035028%2C-118.225053%2C15.51>, accessed January 21, 2022.

planned within the Transportation Assessment Study Area. The closest such project to the Project Site is along Soto Street, approximately 0.6-mile to the east.<sup>16</sup>

## (8) Project Site

The Project Site comprises a 74,063-square-foot lot (1.70 acres) at 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street. The Project Site is currently developed with three buildings (referred to herein as Building 1, Building 2, and Building 3) comprising a total of 39,328 square feet of floor area. Specifically, Building 1 includes 7,106 square feet of office uses, Building 2 includes 6,584 square feet of light industrial uses, and Building 3 includes 25,638 square feet of light industrial and creative office uses. Other smaller structures at the Project Site include shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, and stacked parking systems. In addition, designated areas for storage of industrial byproducts and materials associated with on-site uses are located on the south side of Building 3. The Project Site also includes surface parking on the northern and eastern portions of the Project Site. Vehicular access to the Project Site is available via a driveway along Bay Street.

## 3. Project Impacts

### a. Thresholds of Significance

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

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

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

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

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

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<sup>16</sup> City of Los Angeles, City of Los Angeles GeoHub, High Injury Network Projects Map, <https://ladotlivablestreets.org/programs/vision-zero/maps>, accessed January 21, 2022.

In assessing impacts related to transportation in this section, the City used Appendix G as the thresholds of significance. The factors and considerations identified from the *L.A. CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing the Appendix G thresholds.

The methodology and base assumptions used in this analysis were established by LADOT, and, where LADOT does not prescribe a specific methodology, the criteria identified in the *L.A. CEQA Thresholds Guide* were used. The *L.A. CEQA Thresholds Guide* criteria is discussed below as part of the methodology discussion.

## **b. Methodology**

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

As discussed above, with the implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As such, this analysis does not go into detail on the anticipated effect of the Project with respect to LOS. As described above, CEQA Guidelines' Transportation Threshold (a) has been updated to require an analysis of the proposed Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle, and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the applicable plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. In accordance with LADOT's TAG adopted in July 2020, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered consistent.

An impact would not occur merely for an inconsistency with, or a failure to implement, an adopted plan, program, ordinance, or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies.<sup>17</sup> Furthermore, under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose

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<sup>17</sup> *City of Los Angeles Department of Transportation, Transportation Assessment Guidelines, page 2-2 (July 2020).*



of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

## (2) Vehicle Miles Traveled

### *(a) VMT Impacts Thresholds*

The City's TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted the TAG in July 2019 and adopted an update in July 2020. The City's VMT impact criteria for development projects is specified in Threshold T-2.1 (Causing Substantial VMT) 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, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.
- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

The City's TAG establishes different VMT significance thresholds for each of the seven Area Planning Commission areas as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. The City's significance thresholds (i.e., based on a Daily Household VMT per Capita basis and a Daily Work VMT per Employee) for each of the APC areas are presented in the TAG.

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

- Household VMT per Capita: 6.0

- Work VMT per Employee: 7.6

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

It is noted that local-serving retail development tends to shorten trips and reduce VMT whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT. Local-serving is defined as retail uses (including restaurants) that are less than 50,000 square feet. The retail/restaurant component of the Project is considered to be local serving and this portion of the Project is considered to not have a significant VMT impact based on the screening criteria contained in the City's TAG.

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 RTP/SCS in terms of development location, density, and intensity.

#### *(b) VMT Analysis Methodology*

LADOT developed the City of Los Angeles VMT Calculator Version 1.3 (VMT Calculator) in July 2020 to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. 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 transportation demand management (TDM) measures.

#### *(i) Travel Demand Forecasting and Behavior Zones*

The VMT Calculator uses a project's latitude and longitude to gather information from about the project location, surrounding land uses, travel characteristics, and built environment. The lookup information is obtained from the City of Los Angeles Travel Demand Forecasting (TDF) Model and the City of Los Angeles Travel Behavior Zones (TBZ). The TDF Model considers the traffic analysis zone of the project location to determine the trip length and trip type, which factor into the calculation of the project's VMT. The TBZs informs the VMT Calculator to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, the development of the TBZs considered the population density, land use diversity, intersection density, and distance to nearest transit within each Census tract. TBZs are categorized as follows:

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

*(ii) Mixed-Use Development Methodology*

As detailed in City of Los Angeles VMT Calculator Documentation, the VMT Calculator also accounts for the interaction of land uses within a mixed-use development local to Los Angeles. The mixed-use development methodology considers sociodemographic, land use, and built environment factors for the Project area, including:

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

*(iii) Transportation Demand Management Strategies*

Additionally, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures. The following seven categories of TDM strategies are included in the VMT Calculator:

- **Parking**—Reducing, unbundling, permitting, pricing parking.
- **Transit**—Transit subsidies, reduced headways, neighborhood shuttles.
- **Education & Encouragement**—Travel behavior change program, promotions, and marketing.

- **Commute Trip Reductions**—Required commute trip reduction program, vanpool, ride-share.
- **Shared Mobility**—Car-share, bike share, school carpool program.
- **Bicycle Infrastructure**—On-street bike facilities, bike parking, bike facilities, showers.
- **Neighborhood Enhancement**—Traffic calming, pedestrian network improvements.

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

*(iv) Population and Employment Assumptions*

The VMT Calculator contains population assumptions based on the United States Census Bureau’s American Community Survey 2015 5-year estimates for the City of Los Angeles.<sup>18</sup> Employment assumptions were derived from multiple data sources, including the Los Angeles Unified School District (LAUSD) 2012 Developer Fee Justification Study, the San Diego Association of Governments 2012 Activity Based Model, the Institute of Transportation Engineers 2012 Trip Generation, 9th Edition, the U.S. Department of Energy, and other modeling resources.<sup>19</sup> A summary of population and employment assumptions for various land uses is provided in Table 1 of the City of Los Angeles VMT Calculator Documentation.<sup>20</sup>

### (3) Hazardous Design Features

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

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

<sup>19</sup> *The 2020 LAUSD Developer Fee Justification Study and Trip Generation 10th Edition are now available, but the City’s VMT Calculator utilizes the editions indicated herein.*

<sup>20</sup> *City of Los Angeles Department of Transportation, VMT Calculator Documentation, Version 1.3, May 2020.*

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

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

The Project design, including proposed infrastructure improvements, land uses, and open spaces, will be reviewed to determine if the Project will increase and/or create a hazardous design feature(s) and/or incompatible use.

In May 2020, LADOT provided interim guidance on freeway safety analysis for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and if speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline could constitute a potential safety impact under CEQA. This analysis is included as part of this threshold.

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

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

- For the identified freeway off-ramps, prepare a queuing study for the “Future with Project” conditions for the proposed project build-out year. Evaluate the adequacy of the existing and future storage lengths with the 95th percentile queue and 100 percent of the storage length on each lane of the ramp from the stop line to the gore point. When an auxiliary lane is present, add 50 percent of the length of the auxiliary lane to the ramp storage area.
- If the proposed project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the proposed project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the addition of traffic generated by the proposed project would increase the overflow onto the mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact
- If a proposed project adds two or more car lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact. If the speed differential is 30 mph or more, then there is a potential safety issue. The Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data including location-based services data from available sources could be used.
- If the speed differential is 30 mph or more, which may result in a potential safety issue, the guidance suggests a proposed project should consider the following preferred corrective measures to offset a potential safety issue:
  - TDM program(s) to reduce the project’s trip generation,
  - Investments to active transportation infrastructure, or transit system amenities (or expansion) to reduce the project’s trip generation, and/or
  - Potential operational change(s) to the ramp terminal operations including, but not limited to, lane reassignment, traffic signalization, signal phasing or timing modifications, etc. This option requires coordination with Caltrans and LADOT to assess feasibility and for approval of the proposed measure(s).

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

the improvement may be required if the necessary requirements are met, including, but not limited to, Caltrans defining the improvement cost, and opening a Project File/Project Account to accept a financial contribution for the improvement.

In August 2021 LADOT released an LADOT Transportation Assessment Guidelines Update for Freeway Safety Analysis. This update noted that in December 2020 Caltrans released an “Interim Local Development Intergovernmental Review Safety Review Practitioners Guidance” providing instructions to lead agencies and consultants conducting transportation safety reviews for proposed land use projects affecting the State Highway System, and that the interim guidance is intended to be replaced by the Caltrans “Safety Analysis Guide” that is expected to be developed and released in 2022. As noted in their August 2021 Guidelines Update, LADOT concluded that as the Caltrans Interim Guidance is so closely aligned to LADOT’s Interim Guidance, that LADOT’s Interim Guidance remains in effect until Caltrans releases their “Safety Analysis Guide”.

#### (4) Emergency Access

In consultation with the Los Angeles Fire Department (LAFD), the analysis of the Project’s potential access impacts will include 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 construction activities:

**Project Design Feature TR-PDF-1:** A detailed Construction Management Plan and Worksite Traffic Control Plan shall be prepared and submitted to LADOT for review and approval prior to the issuance of any demolition, grading, or building permits. These plans shall include sidewalk/lane closure information, a detour plan, haul routes, and a staging plan to formalize how construction would be carried out and to identify specific actions required to reduce effects on the surrounding community. The plans shall also identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The plans shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

## d. Analysis of Project Impacts

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

### (1) Impact Analysis

Based on LADOT's TAG and use of LADOT's VMT Calculator, the Project would result in a net increase of 2,119 daily trips. As the Project would generate greater than 250 daily trips (i.e., LADOT's screening criteria), further analysis was required to assess the Project and its effect on existing pedestrian, bicycle, and transit facilities. Table 2.1-1 of the TAG lists documents that establish the regulatory framework relevant to determining project consistency. Table 2.1-2 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following have been assessed for the Project: Mobility Plan 2035; LADOT Manual of Policies and Procedures Section 321; LAMC; Central City North Community Plan; and Transit Oriented Communities Affordable Housing Incentive Program. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

#### *(a) Mobility Plan 2035*

*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.*

The Project would retain the current functionality of Bay Street and Sacramento Streets as Collector Streets. The Project would add a sidewalk and a passenger loading zone to Bay Street. 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.*

While this is a citywide policy, the Project would support its implementation. Specifically, one of the primary objectives of the Project is to provide a pedestrian-oriented development that improves pedestrian experiences within the Arts District. The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, planting street trees, and creating active ground floor commercial space with storefront glazing. In addition, a north-south pedestrian paseo would be constructed to provide access to lobby entrances for tenants and to link Bay Street and Sacramento Street. The pedestrian paseo would be anchored by common open space, street trees, seating areas, and low scale structures to promote an active pedestrian experience on the ground floor. Furthermore, the proposed pick-up/drop-off zone on Bay Street would provide a dedicated space for



Project location employees and patrons arriving via taxi or rideshare services. As such, the Project would ensure high quality pedestrian access in site planning and public right-of way modifications to provide a safe and comfortable walking environment, and would not conflict with Mobility Plan Policy 2.3.

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

The Project is located adjacent to Bay Street and Sacramento Street, which are both Collector Streets and serve only adjacent properties on the Project block. There is no through traffic on the street as the Project is located at the terminus of both dead-end streets. Due to their location, these streets are slow speed streets and local serving. The Project would not change these characteristics and the streets would remain consistent with Policy 2.4. In addition, the Project Site is not located adjacent to street segments of the Neighborhood Enhanced Network. The nearest segment of the Neighborhood Enhanced Network is along Santa Fe Avenue. 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.*

While this is a citywide policy, the Project would not conflict with its implementation. The Project Site is not immediately adjacent to any Transit Enhanced Streets. Furthermore, in 2008, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress and an additional half-cent sales tax increase to fund transportation projects through Measure M in 2016. As such, the Project's net increase in transit trips would be partially offset by improvements to transit service in the Project area. Furthermore, the Project would support these transit investments (and thus this Mobility Plan Policy) by providing infill development in a location that would encourage and facilitate transit ridership.

*Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.*

While this is a Citywide Policy, the Project would support its implementation. Currently, there are no bicycle lanes in the study area. However, per Mobility Plan 2035, 7th Street to the north of the Project Site is designated with Tier 2 bicycle lanes. Similarly, Olympic Blvd to the south of the Project Site is designated with Tier 3 bicycle lanes. The designated Bicycle Path Network segment nearest to the Project Site is the Central LA River Path located immediately east of the Project Site. Furthermore, during operation, Project visitors, patrons, and employees arriving by bicycle would have the same access

opportunities as pedestrian visitors. Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

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

This is a citywide policy that does not apply to the Project because no changes related to vehicular access to the regional freeway system are proposed as part of the Project. Primary regional access to the Project Site is provided by the Santa Monica Freeway (I-10) to the south and east, the Santa Ana Freeway (US-101) to the east and north, and the Golden State Freeway (I-5) to the east, which are all accessible within less than 1 mile of the Project Site. Key roadways providing regional access to the Project Site include Santa Fe Avenue, 7th Street, Olympic Boulevard, and Alameda Street. The Project would not impede access to these roadways or otherwise impede access to the regional freeway system. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.

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

The Project would provide an on-street passenger loading zone directly adjacent to building entrances on Bay Street, which is a dead-end street. As such, passenger loading activity would likely have a minimal impact on the surrounding street network. The Project would also provide an onsite truck loading area within the ground level parking area accessible from the Bay Street and Sacramento Street driveways. As such, truck loading activities would result in a minimal impact on the surrounding street network and the loading docks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

*Policy 2.17 Street Widenings—Carefully consider the overall implications (cost, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.*

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

On the west portion of Bay Street, the Project would decrease the half roadway width from 30 feet to 20 feet, which would still meet the 20-foot required width. The Project

would dedicate 3 feet and provide a 33-foot half right-of-way width and a 13-foot sidewalk to comply with Mobility Plan requirements. On the east portion of Bay Street, the Project would provide a 30-foot half roadway width to maintain the existing width, which would exceed the required width. This section of the roadway width would accommodate a fire truck turnaround and a passenger drop-off zone. Therefore, the Project would be in compliance with the Mobility Plan 2035 along Bay Street.

On Sacramento Street, per the Mobility Plan, the required dimensions are a 33-foot half right-of-way width, a 20-foot half-roadway, and 13-foot sidewalk. The existing dimensions for Sacramento Street include a 30-foot half right-of-way width, 20-foot roadway width, and a 10-foot sidewalk. The Project would retain the 20-foot half roadway width and meet the requirement. The Project would dedicate 3 feet and provide a half right-of-way width of 33 feet with a 13-foot sidewalk and would be in compliance with the Mobility Plan along Sacramento Street.

*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.*

The Project would provide for pedestrian, bicycle, and vehicular modes of travel. As described above, the Project would also be located near public transit. 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.*

The Project would design sidewalks and passenger loading areas in accordance with LADOT and Americans with Disabilities Act (ADA) standards. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.

*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.*

There is no transit service on Bay Street or Sacramento Street. The nearest transit service is on Santa Fe Avenue. The Project would add a new sidewalk on Bay Street adjacent to the Project, and proposes to add a new traffic signal with crosswalks at Sacramento Street & Santa Fe Avenue, which would facilitate pedestrian access to transit service on Santa Fe Avenue. 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.*

The Project would provide on-site bicycle parking in accordance with LAMC requirements. Bicycle parking requirements per LAMC Section 12.21-A,16 include short-term and long-term parking. Short-term bicycle parking would be available on the ground floor, and long-term bicycle parking would be enclosed from inclement weather and secured from the general public. The Project would comply with the LAMC and would provide 78 bicycle parking spaces, including 28 short-term spaces and 50 long-term spaces. Bicycle lockers and showers would also be provided at the ground level. Therefore, the Project would not conflict with Mobility Plan Policy 3.8.

*Policy 3.10 Cul-de-sacs—Discourage the use of cul-de-sacs that do not provide access for active transportation options.*

Although the Project Site is located along both Bay Street and Sacramento Street, which dead-end at the railroad tracks and the Los Angeles River, the Project would not alter the existing roadway pattern or include the development of new cul-de-sacs. In other words, the Project would not result in physical barriers to active transportation options that do not already exist. Therefore, the Project would not conflict with his policy.

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

The Project does not conflict with the portion of Policy 4.13 that discourages utilizing land for parking that could have been used for other valuable uses since all parking will be integrated into the project and not located in a large lot. Moreover, employees and visitors will have to pay for parking; therefore, the Project does not conflict with the policy regarding the abundance of free parking. While the Project would include parking in excess of the LAMC minimum requirements, it would include features to encourage walking and bicycling, and would implement a TDM plan to promote multi-modal transportation. Furthermore, the Project would be consistent with the applicable goals and objectives of the SCAG 2020–2045 RTP/SCS to locate jobs and housing in infill locations served by public transportation and facilitating active transportation and TDM (see Sections IV.A, Air Quality, IV.D, Greenhouse Gas Emissions, and IV.G, Land Use, of this Draft EIR for further discussion). Therefore, the Project would not undermine broader regional goals of creating vibrant public spaces and a robust multi-modal transportation system.

Under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Therefore, even though the Project's parking may exceed the LAMC's minimum

requirements, the Project would be consistent with the overall intent of Policy 4.13 and the Mobility Plan.

Moreover, any inconsistency with the an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The above policy is intended to implement broader regional goals (such as reducing per capita VMT which the Project would do with implementation of the recommended mitigation as discussed under Threshold (b) below), not to mitigate an environmental effect.

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

As discussed above for Policies 2.3, 2.6, 3.5, and 3.8, the Project would provide new and improved sidewalks, a pedestrian paseo to provide access between Bay Street and Sacramento Street, and bicycle parking and facilities at the ground level. In addition, the Project Site's proximity to various public transit options and nearby commercial and offices uses would also promote walkability and alternative modes of transportation. Therefore, the Project would not conflict with Mobility Plan Policy 5.1.

*Policy 5.4 Clean Fuels and Vehicles—Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.*

As required by the City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of the Project's parking spaces would be capable of supporting future electric vehicle supply equipment, and 10 percent of spaces would have electric vehicle charging stations. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.

*Policy 5.5 Green Streets—Maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way.*

The Project would implement a Stormwater Pollution Prevention Plan (SWPPP) during construction as required under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The Project would implement best management practices (BMPs), including erosion control, sediment control, non-stormwater management, and materials management measures, to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would implement Low Impact Development (LID) strategies, including infiltration, stormwater capture and/or High Efficiency Biofiltration/Bioretenion Systems in accordance with the current City of Los Angeles LID Ordinance requirements. Furthermore, to avoid increasing the runoff flow from the Project Site to the Sacramento Street drain, the Project would provide an on-site stormwater runoff detention system. Thus, the Project would maximize opportunities to

capture and infiltrate stormwater within the City's public rights-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 5.5.

*Program ENG.19 First Mile/Last Mile Transit Connectivity Program—Install pedestrian and bicycle connectivity improvements at every major Metro transit station by providing enhanced sidewalk amenities such as landscaping, shading, lighting, directional signage, shelters, curb extensions and midblock crosswalks where feasible, ADA ramps, lead pedestrian interval signal phases, secure bike parking, etc.*

The Project would contribute by providing enhancements such as the addition of new sidewalks with landscaping, lighting, and signage. The Project would design sidewalks and passenger loading areas in accordance with LADOT and ADA standards abutting the Project Site on right-of-way within a half mile of a major transit stop. Furthermore, although the above program focuses on improvements at Metro transit stations that enhance transit connectivity, the Project would include secure on-site bicycle parking that would contribute to transit connectivity and use (for example, by allowing Project employees to bicycle to the Project from the Metro bus stops in the area and from the Greyhound Bus Terminal on 7th Street). Therefore, the Project would not conflict with Mobility Plan Program ENG.19.

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

LADOT Driveway Design Guidelines (Manual of Policies and Procedures Section 321) recommends that driveway widths for commercial projects should be 16 feet for one-way driveways and 30 feet for two-way driveways (or wider for multiple entry lane driveways). The Project would provide a two-way driveway on Bay Street that would be 30 feet wide and would comply with LADOT Driveway Design Guidelines.

The Project would also provide a two-way driveway on Sacramento Street with three lanes and a total width of 41 feet. The 41 foot-wide driveway would not conflict with LADOT allowing wider than 30 feet for multi-lane driveways because: (1) no maximum width is specified in LADOT Driveway Design Guidelines; and (2) the LADOT Driveway Design Guidelines have language that supports the idea of a wider driveway for multi-lane driveways such as that proposed. In addition, a second two-way driveway on Sacramento Street would be limited to a width of 24 feet, 7 inches due to site design constraints from the existing electrical power pole immediately east of the driveway. As such, this second driveway would not meet LADOT's recommended width of 30 feet. However, since the driveway would be in close proximity to the Sacramento Street dead-end to the east, only traffic from the west and that exiting the Project Site would use this driveway, and no traffic other than Project traffic would be passing the driveway. Therefore, as concluded in the Transportation Assessment, this driveway width would not substantially conflict with LADOT Driveway Design Guidelines.

LADOT provides minimum clearance distances for driveways based on the amount of parking spaces provided. Parking entry control and security gate on the main driveway on Sacramento Street would be located approximately 25 feet from the property line. LADOT guidelines require the entry gate at this location, which would provide access to 605 parking spaces, to be 60 feet from the property line.<sup>21</sup> The proposed design for this driveway would include a center reversible lane, so at peak times there would be two inbound lanes, which would provide a total reservoir distance of 50 feet. Given that the Project Site is located at the end of dead-end Sacramento Street, that the only traffic on Sacramento Street is local traffic, and that there is/would be no vehicular traffic passing this driveway, the 50-foot reservoir distance would not substantially conflict with LADOT Driveway Design Guidelines. On Bay Street and Sacramento Street, while no parking controls would be anticipated for the surface parking driveways, the Project would provide security gates approximately 40 feet from the property line and would comply with LADOT clearance requirements.

Therefore, based on the above, the Project would be generally consistent with LADOT Manual of Policies and Procedures Section 321, which states that the goal of good driveway design is to minimize adverse effects on street traffic. As detailed under Threshold (c), the Sacramento Street driveways would not substantially increase hazards due to a geometric design feature and related impacts would be less than significant.

*(c) Los Angeles Municipal Code*

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

Pursuant to LAMC Section 12.21-A.16, the Project would require 65 office bicycle parking spaces (22 short-term, 43 long-term) and 6 retail/restaurant bicycle parking spaces (3 short-term, 3 long-term). The Project would provide the required bicycle parking and would not conflict with LAMC Section 12.21-A, 16.

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

LAMC Section 12.26-J applies only to the construction of new non-residential gross floor area, and to developments in excess of 25,000 square feet of commercial area. As discussed further below under Threshold (b), the Project would include a TDM plan, which would be subject to review and approval by LADOT. Therefore, the Project would not conflict with LAMC Section 12.26-J.

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<sup>21</sup> LADOT Driveway Design Guidelines, Section 321, page 6.

*(iii) LAMC Section 12.37 (Waivers of Dedications and Improvement)*

As detailed above under Mobility Plan Policy 2.17, the Project has been designed to be consistent with the street standard requirements of the Mobility Plan and would not seek a WDI. Furthermore, LAMC Section 12.37 does not apply because the Project would fulfill applicable dedication and improvement requirements through the tract map conditions of approval. Therefore, the Project would not conflict with LAMC Section 12.37.

*(d) Central City North Community Plan*

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

*(i) Policies*

*Policy 2-2.2—New development needs to add to and enhance the existing pedestrian street activity.*

*Policy 2-3.1—New development needs to add to and enhance the existing pedestrian activity.*

Policies 2-2.2 and 2-3.1, which are substantially similar, call for adding to and enhancing existing pedestrian activity. The Project Site is currently developed with offices, creative offices, and light industrial uses. Under existing conditions, no sidewalk exists adjacent to the Project Site on Bay Street, and limited ornamental landscaping surrounds the site. The Project would increase the footprint on the Project Site by developing approximately 217,189 square feet of creative office space and 5,000 square feet of new retail and restaurant space. As such, the proposed uses would complement the recent development trends in the Arts District and would increase the number of onsite employees and visitors. The Project would enhance pedestrian activity within and around the Project Site by providing new sidewalks, street trees, active ground floor commercial space with storefront glazing, and lobby entrances for the office/creative office tenants along a pedestrian paseo. The paseo would allow pedestrians to access Bay Street and Sacramento Street through the Project Site and would also include landscaped planters and various gathering areas. In addition, development of the Project would further enhance pedestrian connections in the area and within the public realm that are linked to residential and commercial developments in the vicinity. The Project Site's proximity to various public transit options and nearby commercial and offices uses would also promote walkability. Hence, the Project would not conflict with Policies 2-2.2 and 2-3.1.

*Policy 2-2.3 and Policy 2-3.4—Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.*



The Project would provide active retail, restaurant, and office uses on the first floor street frontages to promote pedestrian activity.

*Policy 12-1.1—Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.).*

*Policy 12-1.3—Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.*

The Project would develop a TDM plan pursuant to Mitigation Measure TR-MM-1. The final TDM plan would be approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. The following TDM strategies would be implemented for the proposed office uses:

- Parking: Parking cash-out (75% employees assumed eligible).
- Education & Encouragement: Promotions and marketing (100% employees and eligible)
- Commute Trip Reductions: Ride-share program (100% employees eligible)
- Shared Mobility: Provide car-share and bike share spaces.
- Bicycle Infrastructure: Implement/improve on street bicycle facility through \$100,000 contribution to Bicycle Trust Fund; provide bicycle parking per LAMC; include secure bike parking and showers.
- Neighborhood Enhancement: Pedestrian network improvements.

*Policy 12-1.4—TDM measures in Central City North should be consistent with adopted City policy.*

The TIMP strategies outlined in the Community Plan that are applicable to the Project require education on carpooling and ridesharing, expanding employer-based commute assistance programs, and requiring new development to include bicycle facilities. The Project would implement TDM measures under Mitigation Measure TR-MM-1 that would be consistent with these strategies and reduce vehicle trips. In addition, the Project would provide bicycle parking as required under the bicycle ordinance.

*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.*

The Project would provide a total of 78 bicycle parking spaces (28 short-term, 50 long-term) in accordance with LAMC requirements. The Project would also provide bicycle lockers and showers and changing rooms onsite.

*(ii) Transportation Improvement and Mitigation Plan*

The following TIMP programs were reviewed to determine Project consistency with the Central City North Community Plan.

Street Reclassifications

The TIMP proposes implementation of a new street classification, local industrial, in the Central City North Community Plan area. None of the streets along the Project frontages are classified as local industrial. Therefore, the Project would not conflict with the TIMP's street reclassification program.

Transportation Demand Management Program

The TIMP identifies TDM programs and other improvements to enhance safety and mobility in the Community Plan area. As discussed above, Policies 12-1.1, 12-1.3, and 12-1.4 are relevant, and the Project would not conflict with these policies.

*(iii) Urban Design Chapter*

This section addresses policies in the Urban Design Chapter of the Community Plan that are relevant to the circulation system.

*A. Commercial—1. Site Planning: Structures shall be oriented toward the main commercial street where a parcel is located and shall avoid pedestrian/vehicular conflicts.*

The Project would be consistent with this design policy by locating parking to the rear of structures and in subterranean levels; maximizing retail and commercial service uses along frontages of commercial developments; providing front pedestrian entrances for businesses fronting the street; providing site plans that include ancillary structures, service areas, pedestrian walkways, vehicular paths, loading areas, drop-off, and landscaped areas.

As such, the Project would orient development to avoid pedestrian/vehicular conflicts and would not conflict with this aspect of the Community Plan.

*(e) Vision Zero & Safe Routes to School*

The Project Site is not located adjacent to any streets identified in the High Injury Network or Safe Routes to Schools (SRTS) project schools.<sup>22,23</sup> In addition, while no Vision Zero Safety Improvements are currently planned near the Project Site, Project improvements to the pedestrian environment, such as new/widened sidewalks along the Project Site's Bay Street and Sacramento Street frontages and the on-site paseo which would provide a safe pedestrian connection between Bay and Sacramento Streets, would enhance the pedestrian environment and would, along the proposed new driveways, not preclude future safety improvements by the City. Furthermore, the Project Site is located close to the easterly dead ends of Bay and Sacramento Streets, and few if any students use these portions of Bay and Sacramento Streets to get to school. Lastly, there are no schools identified as part of LADOT's ongoing SRTS program within the Study Area. Therefore, the Project would not be in conflict with the Vision Zero Action Plan or SRTS.

*(f) Regional Transportation Plan/Sustainable Communities Strategy*

The Project's general consistency with the applicable goals and principles set forth in SCAG's 2020–2045 RTP/SCS is analyzed in detail in Sections IV.A, Air Quality, IV.E, Greenhouse Gas Emissions, and Section IV.H, Land Use, of this Draft EIR. As described therein, the Project would not conflict with the applicable goals and principles set forth in the RTP/SCS. In summary, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods as well as reducing GHG emissions by developing new office and commercial retail uses on a Project Site on an urban infill site within an area well served by public transit provided by Metro and LADOT. In addition, the Project would provide bicycle parking spaces for Project uses to promote the use of alternative transportation.

With regard to the VMT and greenhouse gas (GHG) goals of SCAG's RTP/SCS, as detailed in the Transportation Assessment and further discussed below, the Project would not result in a significant VMT impact after implementation of mitigation. Specifically, the Project would incorporate TDM strategies as mitigation. Implementation of the proposed TDM strategies would result in a Daily Work VMT per Capita impact that is less than significant. Therefore, as the VMT impacts related to the Project have been shown to be mitigated, the Project would be consistent with the VMT and GHG goals of SCAG's RTP/SCS.

<sup>22</sup> LADOT, *Vision Zero Safety Improvements*, <http://ladot.maps.arcgis.com/apps/View/index.html?appid=77df605a3eb142c7a0abc1c65bcf4861>, accessed January 20, 2020.

<sup>23</sup> LADOT, *Safe Routes to School, Maps*, <https://ladotlivablestreets.org/programs/safe-routes-to-school/maps>, accessed June 7, 2020.

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

As discussed in detail in Section IV.H, Land Use, and Appendix I, Land Use Tables, of this Draft EIR, the Project would not conflict with Los Angeles General Plan Health and Wellness Element—Plan for a Health Los Angeles, and Citywide Design Guidelines policies that address the circulation system. As such, the Project would not conflict with these programs, plans, ordinances, and policies.

*(h) Conclusion*

As discussed above, the secondary driveway on Sacramento Street would not meet LADOT's recommended width of 30 feet as the driveway would be limited to a width of 24 feet, 7 inches due to site design constraints from the existing electrical power pole immediately east of the driveway. However, since the driveway would be in close proximity to the Sacramento Street dead-end to the east, only traffic from the west and that exiting the Project Site would use this driveway, and no traffic other than Project traffic would be passing the driveway. Therefore, as concluded in the Transportation Assessment, this driveway width would not substantially conflict with LADOT Driveway Design Guidelines. Additionally, as discussed above under Methodology, in accordance with LADOT's TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered consistent. As detailed above, overall, the Project would not conflict with the applicable regulations addressing the circulation system and would be consistent with the overall intent of the applicable plans and requirements. **As such, the Project's impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant.**

**(2) Mitigation Measures**

The Project would be consistent with the applicable programs, plans, ordinances, and policies addressing the circulation system. Therefore, impacts would be less than significant, and no mitigation measures are required.

**(3) Level of Significance After Mitigation**

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

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

## (1) Impact Analysis

As discussed above, Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

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

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

As described in Section II, Project Description, of this Draft EIR, the Project proposes approximately 217,189 square feet of creative office space and 5,000 square feet of retail and restaurant space. As described in the Methodology Subsection, a portion of, or entirety of a project that contains small-scale or local serving retail land uses (including restaurants) is assumed to have less-than-significant VMT impacts and can be excluded from the VMT analysis if less than 50,000 square feet. Therefore, the Project's approximately 5,000 square feet of retail and restaurant would not contribute to work-related VMT.

Based on the VMT Calculator results (see Appendix M of this Draft EIR), the Project would generate a net increase of 2,119 daily trips and would result in "yes" in response to both questions above. As such, further VMT analysis was conducted.

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

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

The Project would result in a Household VMT per Capita ratio of 0 because no residential uses would be provided. The Project would result in a Work VMT per Employee ratio of 9.1, which would exceed LADOT's threshold of 7.6.<sup>24</sup> **Therefore, the Project could potentially conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and impacts would be potentially significant.**

## (2) Mitigation Measures

Project-level impacts with regard to Work VMT would be significant without mitigation. Therefore, the Project would require a TDM program to reduce trips to and from the Project Site and mitigate impacts from the proposed office uses.

**Mitigation Measure TR-MM-1:** The Project shall prepare and implement a TDM Program with the following measures subject to review and approval by LADOT:

- *Parking cash-out.* The Project shall require employers to offer employees the opportunity to “cash-out” the monthly value of their free or subsidized parking space with 75 percent of employees assumed eligible.
- *Education & Encouragement—Promotions and Marketing.* The Project shall use marketing, educational and promotional tools, and materials (such as posters, info boards, or a website with information) to educate and inform travelers about site-specific transportation options and the effects of their travel choices with 100 percent of employees eligible.
- *Commute Trip Reductions—Ride-share Program.* The Project shall provide a rideshare program to include ride-share matching services, designating preferred parking for ride-share participants, adequate passenger loading/unloading and waiting areas for ride-share vehicles, and providing a website or message board to connect riders and coordinate rides with 100 percent of employees eligible.
- *Shared Mobility—Car-share and bike share.* The Project shall provide 10 on-site bike share spaces to allow people to have on-demand access to a bicycle, as needed.

<sup>24</sup> Based on the LADOT Transportation Assessment Guidelines and the City of Los Angeles VMT Calculator User Guide, a portion of, or entirety of a project that contains small-scale or local serving retail land uses is assumed to have less-than-significant VMT impacts and can be excluded from the VMT analysis if less than 50,000 square feet. Local serving retail land uses would include restaurants. Therefore, the Project VMT calculations exclude the proposed 5,000 square feet of retail and restaurant space.

- *Bicycle Infrastructure.* The Project shall implement/improve on street bicycle facility through the contribution of \$100,000 to LADOT's Bicycle Trust Fund for LADOT to implement improvements for the bicycle network and/or facilities in the Project area; provision of bicycle parking per LAMC requirements; and provision of secure bike parking and showers.
- *Neighborhood Enhancement—Pedestrian Network Improvement.* The Project shall enhance pedestrian circulation by providing an on-site pedestrian paseo connecting Bay Street and Sacramento Street.

### (3) Level of Significance After Mitigation

As shown in Table IV.K-1 on page IV.K-44, implementation of the TDM program would reduce the Project's Work VMT per Employee from 9.1 to 7.5 as demonstrated by the VMT Calculator, thus reducing the Project's VMT impacts from significant to less than significant. Project-level impacts with regard to VMT pursuant to CEQA Guidelines Section 15064.3 would be less than significant with mitigation incorporated.

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

### (1) Impact Analysis

The Project Site is located adjacent to dead-ends on Bay Street and Sacramento Street and is essentially flat. To the east of the dead-ends are the BNSF railway tracks. There is minimal pedestrian activity around the Project Site, and there are no existing pedestrian or bicycle connections nor the opportunity for any future connections. There are no slopes, curves, landscaping or other barriers that would impede visibility or that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts. In addition, the Project would not result in incompatible uses as the proposed office, retail, and restaurant uses are consistent with the commercial uses in the Project vicinity.

Based on LADOT's TAG, as the Project would provide new driveways and vehicle access as well as modifications to the public right-of-way, further analysis was required to assess potential impacts (e.g., safety, operational, or capacity) for geometric design hazards. Specifically, the Project would provide three driveways, all of which would be perpendicular to the street with no sharp curves or visibility issues. Landscape design would also ensure there would be no impediments to visibility of and by vehicles, bicycles and pedestrians.

**Table IV.K-1  
Project VMT per Employee with Mitigation**

	<b>Work VMT per Employee</b>	<b>Threshold</b>	<b>Significant Impact?</b>
Project	9.1	7.6	Yes
Project with Mitigation	7.5	7.6	No
<p><sup>a</sup> Based on LADOT's TAG and the City of Los Angeles VMT Calculator User Guide, a portion of, or entirety of a project that contains small-scale or local serving retail land uses is assumed to have less-than-significant VMT impacts and can be excluded from the VMT analysis if less than 50,000 square feet. Local serving retail land uses would include restaurants. Therefore, the Project VMT calculations exclude the proposed 5,000 square feet of retail and restaurant space.</p> <p>Source: The Mobility Group, 2020.</p>			

As discussed under Threshold (a), the Project's two-way, two-laned driveway on Bay Street and two-way, three-laned driveway on Sacramento Street would be designed in accordance with the width recommendations in Section 321 of LADOT Manual of Policies and Procedures (Driveway Design Guidelines). The two-way, two-lane driveway on Sacramento Street would not meet LADOT's recommended width of 30 feet and would instead be limited to a width of 24 feet, 7 inches due to site design constraints from the existing electrical power pole immediately east of the driveway. However, since the driveway would be in close proximity to the Sacramento Street dead-end to the east, only traffic from the west and that exiting the Project Site would use this driveway, and no traffic other than Project traffic would be passing the driveway. Therefore, the Sacramento Street driveway width would not substantially increase hazards due to a geometric design feature. As also detailed under Threshold (a), with regard to LADOT's minimum reservoir distances for driveways, the Project would comply with clearance requirements for the two-way, two-laned driveways on Bay Street and Sacramento Street that provide access to surface parking. The two-way, three-laned main driveway on Sacramento Street that would access to 605 subterranean parking spaces would provide a reservoir distance of 50 feet, which would be less than the minimum 60-foot distance requirement. As discussed above, given that the driveway would be near the dead-end Sacramento Street, the 50-foot reservoir distance would not substantially conflict with LADOT Driveway Design Guidelines.

As the Project Site is not located adjacent to any High Injury Network<sup>25</sup> streets or SRTS project sites,<sup>26</sup> the Project would not make any changes to the roadway system that

<sup>25</sup> LADOT, *Vision Zero Safety Improvements*, <http://ladot.maps.arcgis.com/apps/View/index.html?appid=77df605a3eb142c7a0abc1c65bcf4861>, accessed January 20, 2020.



would impact the High Injury Network or SRTS (there are no SRTS project sites adjacent to the Project).

Furthermore, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a development project adds 25 or more trips to any freeway off-ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queueing impacts following the identified steps in the guidelines. If the project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As shown in Table IV.K-2 on page IV.K-46, the Project would add less than 25 trips to all the freeway off-ramps in both the morning and afternoon peak hours. Therefore, further analysis would not be required, and the Project would not increase hazards related to freeway off-ramps.

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

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

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

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

## (1) Impact Analysis

### *(a) Construction*

Construction activities associated with the Project (i.e., movement of construction equipment, hauling of soil and materials, daily construction worker traffic, etc.) could potentially impact the provision of emergency services by the LAFD and LAPD in the

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<sup>26</sup> LADOT, *Safe Routes to School, Maps*, <https://ladotlivablestreets.org/programs/safe-routes-to-school/maps>, accessed June 7, 2020.

**Table IV.K-2  
Project Trip Volumes Added to Off-Ramps**

Off-Ramp Location	Project-Added Trip Volumes	
	A.M. Peak Hour	P.M. Peak Hour
US-101 Southbound Off-Ramp at 7th Street	12	4
I-5 Northbound Off-Ramp at 7th Street	6	2
I-10 Westbound Off-Ramp at Santa Fe Avenue	23	8
I-10 Eastbound Off-Ramp at Santa Fe Avenue	17	9
Source: <i>The Mobility Group, 2020.</i>		

vicinity of the Project Site as a result of construction impacts to the surrounding roadways. The nearest designated freeway disaster routes to the Project Site include the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than one mile of the Project Site. Santa Fe Avenue and Alameda Street are the closest designated surface street disaster routes, located approximately 0.1-mile and 0.6-mile, respectively, from the Project Site.<sup>27</sup>

Construction would occur for a period of approximately 30 months. During this time, it is expected that the closure of the existing parking lane and one traffic lane on the south side of Bay Street, as well as the closure of the existing sidewalk and parking lane and one traffic lane on the north side of Sacramento Street adjacent to the Project Site, would be required. As previously discussed, no sidewalk exists on Bay Street adjacent to the Project Site. As both Bay Street and Sacramento Street terminate at the Project Site, there is no pedestrian activity east of the Project Site and the streets would only include traffic to adjacent land uses. While lane closure would be required, the Project would ensure that local traffic accessing street parking would be allowed to turn around. Furthermore, as Project construction activities would not close or block access to any properties in the vicinity, there would be no substantive negative effects on access to other properties. Nonetheless, short-term and temporary construction activities could temporarily increase response times for emergency vehicles due to travel time delays. Thus, with implementation of the Construction Traffic Management Plan and Worksite Traffic Control Plan, prepared pursuant to Project Design Feature TR-PDF-1, emergency access would not be impeded. A Construction Traffic Management Plan (CTMP) and a Worksite Traffic Control Plan (WTCP) would be prepared by the Project Applicant for approval by LADOT prior to the issuance of any demolition, grading, or building permits and would specify the

<sup>27</sup> *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

details of any sidewalk and lane closures. The plans would identify all traffic control measures, signs, delineators, flagmen and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Project would also coordinate the plan details with emergency services. As such, the plans would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. 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.

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

*(b) Operation*

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

**As such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operation of the Project.**

## (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

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

## e. Cumulative Impacts

### (1) Impact Analysis

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

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

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed under Threshold (a) above in the Project-level analysis, the Project's impacts would be less than significant. The majority of the programs, plans, policies, and ordinances reviewed above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21-A,16 and the TDM Ordinance from LAMC Section 12.26-J apply to projects individually. Also, in many cases, the Project would specifically support key policies such as enhancing pedestrian infrastructure. Furthermore, the related projects primarily propose high-density residential, office, and commercial uses in an area with good transit connectivity, reducing dependence on automobiles and encouraging more active travel modes (likely making the majority of the related projects consistent with programs, plans, ordinances and policies addressing the circulation system). In addition, each related project would be separately reviewed for consistency with applicable LAMC requirements during the building permit process (including site plan review for those projects subject to such review), while those projects subject to CEQA review would also be checked for their consistency with applicable policies. **Therefore, the Project, together with the related projects, would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances, and cumulative impacts would be less than significant.**

#### *(b) Vehicle Miles Traveled*

As discussed in LADOT's TAG, a development project would have a cumulative VMT impact if it exceeds the VMT threshold and is deemed inconsistent with the SCAG 2020–2045 RTP/SCS, the regional plan to reach state air quality and GHG reduction

targets. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. As set forth above, the Project would not result in a significant VMT impact with mitigation. As set forth in Sections IV.A, Air Quality, IV.G, Greenhouse Gas Emissions, and IV.H, Land Use, of this Draft EIR the Project would be consistent with the SCAG RTP/SCS. **Therefore, the Project's cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

*(c) Hazardous Geometric Design Features*

As previously discussed, the block containing the Project Site and in the overall study area are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. According to LADOT's 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.<sup>28</sup> As identified in Section III, Environmental Setting, of this Draft EIR, Related Project No. 9 (2110 Bay Street) is located west of the Project Site on the same block and would propose residential, office, and retail uses. As discussed above, the Project Site is located at the end of the dead-end Bay Street and Sacramento Street, and Project activities would be limited to the Project Site and sidewalk/lanes immediately adjacent to the Project Site. As such, the Project's new driveways and pick-up and drop-off zones would not increase hazards for Related Project No. 9 due to a geometric design feature or incompatible use. In addition, any modifications to the street system proposed as part of the Project and all related projects would be reviewed by LADOT to ensure that modifications do not create dangerous travel conditions. As with the Project, the design of related projects would also be reviewed by the Los Angeles Department of Building and Safety and LADOT during the City's standard required plan review process to ensure all applicable building design requirements are met. **Therefore, significant cumulative impacts related to hazardous geometric design features would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts with respect to hazardous geometric design features would be less than significant.**

*(d) Freeway Off-Ramp Safety Analysis*

Under LADOT's Interim Guidance for Freeway Safety Analysis, a project would not have the potential to result in significant freeway safety unless it adds 25 or more trips to any off ramp in either the morning or afternoon peak hour. As the Project trips would not exceed this screening threshold at any area off ramps, the Project's impacts to freeway

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<sup>28</sup> Los Angeles Department of Transportation, *Transportation Assessment Guidelines*, p. 2-18, July 2020.

safety would be less than significant, and the Project would not make a considerable contribution to cumulative freeway safety impacts.

*(e) Emergency Access*

During construction, the majority of the Project construction activities would be confined to the Project Site, and the Project would implement a detailed Construction Management Plan as required by Project Design Feature TR-PDF-1 to ensure that emergency access to the Project Site and adjacent properties is maintained during the construction period (including coordinating construction activities with the construction activities of other close-by projects, as required). Hence, the Project would not contribute considerably to any cumulative construction-related hindrance of emergency access. Furthermore, each of the related projects would be required to implement their own Construction Management Plan to accomplish the same.

During operation, as analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the 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. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected.

**Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to emergency access would be less than significant.**

**(2) Mitigation Measures**

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and policies; VMT/CEQA Guidelines Section 15064.3; hazardous geometric

design features; freeway off-ramp safety; and inadequate emergency access would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

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