IV. Environmental Impact Analysis
H. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is based on the Violet Street Creative Office Campus Project Transportation Assessment[1] (Transportation Assessment) prepared for the Project, and included in its entirety in Appendix M.1 of this Draft EIR. The Transportation Assessment was prepared pursuant to LADOT's Transportation Assessment Guidelines (TAG; 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 was approved by LADOT on February 28, 2023. A copy of LADOT's Assessment Letter for the Transportation Assessment is included as Appendix M.2 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Americans with Disabilities Act of 1990
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743

[1] *Fehr & Peers, Violet Street Creative Office Campus Project Transportation Assessment, November 2022. Refer to Appendix M.1 of this Draft EIR.*

- 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) Americans with Disabilities Act of 1990

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

(2) State

(a) Complete Streets Act

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

legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

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

(b) Assembly Bill 32 and Senate Bill 375

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

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

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

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

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

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they: (1) are at least 50 percent residential;

(2) meet density requirements; and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

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

(c) California Vehicle Code

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

(d) Senate Bill 743

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

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

Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

Based on these changes, on July 30, 2019, the City of Los Angeles City Council adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its 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 Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop[2] or a stop along an existing high-quality transit corridor[3] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

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

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

(3) Regional

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

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

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016–2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for four percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within 0.5 mile of a major transit stop that is existing or planned. Job centers are defined as areas with significantly higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the "Core Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020–2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and

enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a 5-percent reduction in VMT per capita, 9-percent reduction in vehicle hours traveled, and a 2-percent increase in work-related transit trips.

(4) Local

(a) City of Los Angeles Mobility Plan 2035

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

(1) Safety First;

(2) World Class Infrastructure;

(3) Access for All Angelenos;

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

(5) Clean Environments and Healthy Communities.

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

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

- Arterial Streets: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:

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

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

The Project Site is located within the Central City North Community Plan (Community Plan) area. The Community Plan was adopted in 2000 and amended in 2016 as part of the Mobility Plan Update. While an updated Community Plan is currently under development, the plan from 2016 is currently in effect. The Community Plan includes transportation-related objectives, policies, and programs in Chapter III, Land Use Plan Policies and Programs. 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.

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.

(c) Los Angeles Municipal Code

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

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

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

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

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

(d) LADOT Transportation Assessment Guidelines

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on VMT, pursuant to State CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to

provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[5]

(e) LADOT Manual of Policies and Procedures Section 321

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

(f) Vision Zero

The Vision Zero Los Angeles program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last updated in 2018, represents 6 percent of the City's street miles but accounts for approximately two thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

(g) Interim Guidance for Freeway Safety

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

(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

[5] *Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, July 2020.*

Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design which serves to reduce VMT.

(i) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[6] 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.

(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.[7] 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.[8]

b. Existing Transportation System

The existing street system in the study area consists of freeways, arterials, collector, and local streets, which provide regional, sub-regional, and local access and circulation within the study area. The study area also includes existing public transit and pedestrian

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

[7] *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.*

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

and bicycle infrastructure. The existing street system and transit network is shown in Figure IV.H-1 on page IV.H-14.

(1) Freeways

The Project Site is located in the Arts District area of downtown Los Angeles. The Project area is served by an extensive freeway network. Primary regional access to the Project area is provided by the Santa Monica Freeway (I-10), the Hollywood Freeway (US-101), the Golden State Freeway (I-5), and the Pomona Freeway (SR-60), all of which are accessible within 1.5 miles of the Project Site. Each of these freeways are described below and provide regional access to and from the study area and connect with each other via the East Los Angeles Interchange:

- I-5 runs in the north/south direction and extends from San Diego, through the East Los Angeles Interchange, and north to the rest of California, Oregon, and Washington. In the vicinity of the Project Site, the freeway provides two to five lanes in each direction. Access is provided at Mateo Street and Santa Fe Avenue via I-10 and 7th Street.

- I-10 runs in an east/west direction and extends from the Pacific Ocean eastward through Los Angeles County and beyond. In the vicinity of the Project Site, the freeway provides two to five lanes in each direction. Access is provided at Alameda Street, Mateo Street, Santa Fe Avenue, 9th Street, Porter Street, and Mateo Street/Enterprise Street. Between the East Los Angeles Interchange and I-5/I-10 interchange near the Los Angeles County/USC Medical Center, I-10 shares an alignment with I-5 and runs in a north/south direction.

- SR-60 runs in an east/west direction and extends from the East Los Angeles Interchange to Riverside County. In the vicinity of the Project Site, the freeway provides four to five lanes in each direction. Access is provided at Soto Street, Mateo Street and Santa Fe Avenue via I-10, and other ramps via US-101 and I-5/I-10.

- US-101 runs in the southeast/northwest direction, extending from the East Los Angeles Interchange through Hollywood, the San Fernando Valley, and beyond. In the vicinity of the Project Site, US-101 provides three lanes in each direction. Access is provided at 7th Street and other ramps via I-5/SR-60.

(2) Streets

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

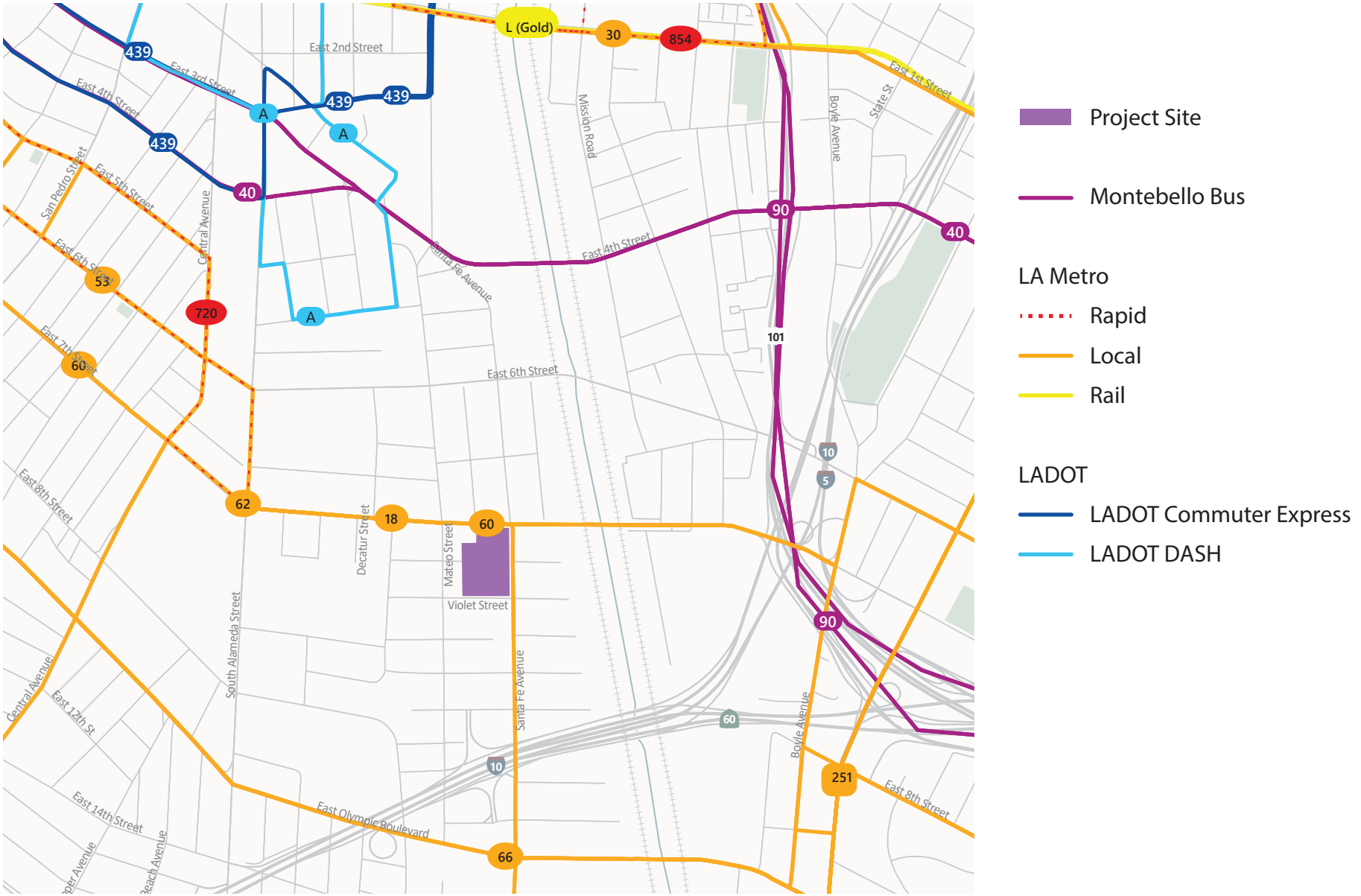

Figure IV.H-1
Existing Street System and Transit Network

Source: Fehr & Peers, 2022.

(a) North-South Streets

- Alameda Street is designated as an Avenue I that runs west of the Project Site. Parking is permitted on both sides of the street between Center Street and Bay Street and left-turn pockets are present at major intersections. There are no bikeways within the study area and Alameda Street is part of the VEN.

- Mateo Street is designated as an Avenue III that runs west of the Project Site. Parking is generally permitted on both sides of the street. Left-turn pockets are not present at any major intersection. There are no bikeways within the study area and Mateo Street is part of the NEN.

- Santa Fe Avenue is designated as an Avenue II that runs east of the Project Site. Parking is available on both sides or on one side of the street along most parts of the corridor. Santa Fe Avenue is part of the NEN.

(b) East-West Streets

- 7th Street is designated as an Avenue II and runs north of the Project Site. Parking is generally permitted on both sides of the street and left-turn pockets are present at major intersections. 7th Street runs east of Santa Fe Avenue across the 7th Street Bridge to Boyle Heights. Although there are no bikeways within the study area, 7th Street is part of the BEN.

- Violet Street is a designated Collector Street that runs south of the Project Site. Violet Street runs from Wilson Street and ends in a cul-de-sac east of Santa Fe Avenue. Parking is permitted on both sides of the street. There are no existing bikeways within the study area and Violet Street does not currently have modal priorities as identified in the Mobility Plan.

(3) Public Transit

Due to its proximity to the transit hubs in downtown Los Angeles, the Project site is served by several public transit lines. The Project Site is located approximately one mile away from the L Line (Gold) Pico/Aliso Station and 1.8 miles away from the 7th Street/Metro Center Station. Five Metro Local bus routes, one Metro Rapid Route, one LADOT DASH bus route, one LADOT commuter express route, and one Montebello Bus Lines route have stops near the Project Site. Along the frontage of the Project site, Metro Local Route 60 runs on 7th Street and Santa Fe Avenue with average A.M. and P.M. peak period headways of 6-8 minutes; Metro Local Route 18 runs on 7th Street from Alameda Street to Boyle Avenue with average A.M. and P.M. peak period headways of 7.5 minutes; and Metro Local Route 62 runs on 7th Street from Central Avenue to Boyle Avenue with average A.M. and P.M. peak period headways of 30-60 minutes. These average peak hour headways reflect Metro service available as of February 20, 2022, which include adjusted service levels

implemented by Metro to operate more reliably each day, reduce missed service, and create shorter wait times and more room on each bus for transit riders.[9] The Montebello Bus Lines route 40 has its nearest stop approximately 0.6 mile away from the Project Site at the corner of 4th Street & Merrick Street. The LADOT Commuter Express 439 has its nearest stop approximately 0.8 mile away from the Project Site at the corner of Santa Fe Avenue & 3rd Street. The LADOT DASH A route has its nearest stop approximately 0.7 mile away from the Project Site at the corner of Molino Street & Palmetto Street. On July 10, 2021, LADOT Transit began to introduce improvements to existing DASH routes and add DASH routes as part of the service expansion. The expansion, which includes service improvements for DASH A, will continue through the end of 2024. Existing transit services in the study area are shown in Figure IV.H-1 on page IV.H-14. The Project Site is not located along any streets identified in the Mobility Plan's TEN.

(4) Bicycle Facilities

As shown in Figure 4 of the Transportation Assessment, there are a limited number of existing bike lanes within the Project study area. There are existing Class II bike lanes on portions of East 3rd Street and East 1st Street and existing Class III bike routes on portions of East 2nd Street, East 1st Street, State Street, and East 8th Street.

(5) Pedestrian Facilities

The study area generally has a patchwork of pedestrian facilities, such as sidewalks and accessible curb ramps. Major streets such as Mateo Street, Santa Fe Avenue, and 7th Street typically have more pedestrian facilities than other minor streets. Many areas and streets lack curbs, sidewalks, and accessible ramps due to the historically industrial nature of the area.

As noted above, the HIN spotlights streets with a high concentration of traffic collisions that result in severe injuries and deaths, with an emphasis on those involving people walking and bicycling. Within the study area, 7th Street is identified by the City as a part of the HIN. However, 7th Street along the Project frontage is not part of the HIN.

d. Existing Project Site Conditions

The Project Site is comprised of four lots. Lot 1, located at the southwestern corner of the Project Site (2045 E. Violet Street and 2020 E. 7th Place) is improved with 25,798 square feet of warehouse uses and 9,940 square feet of office uses, along with

[9] *Los Angeles County Metropolitan Transportation Authority, "Metro has made service changes," https://lacmta.github.io/mybus-dev/all-changes.html, accessed May 30, 2023.*

associated surface parking and truck loading areas. Lot 2, located at the northwestern corner of the Project Site (2030 E. 7th Street) is developed with a five-story, 163,804-square-foot, 604-stall vehicle parking garage with a rooftop level. The at-grade and above-grade parking structure has vehicular ingress and egress from 7th Street and 7th Place. Lot 3, located at the northeastern portion of the Project Site (777 S. Santa Fe Avenue) along Santa Fe Avenue between 7th Street and Violet Street is currently improved with a two- and five-story 244,795 square-foot office building currently occupied by Warner Music Group. Lot 4, located at the southeastern corner of the Project Site (2051 E. Violet Street), is developed with a 21,880-square-foot warehouse with one story and a mezzanine. The Project Site also includes portions of 7th Place and an alley that connects the terminus of 7th Place to Violet Street. The Project Site is partially bisected by 7th Place, an east/west Collector Street, which terminates within the Project Site and provides vehicular access to Mateo Street to the west. A public alleyway traverses the Project Site, running north/south between the terminus of 7th Place and Violet Street.

e. Future Transportation Context

(1) Related Projects

The Transportation Assessment also considers the effects of other development proposals (related projects) either proposed, approved, or under construction near the Project Site. The list of related projects was compiled based on information obtained from the Department of City Planning and LADOT, as well as recent studies of projects in the area. A total of 27 related development projects, including the DTLA 2040 Plan, were identified within a 0.8 mile radius of the Project Site, as shown in Figure III-1 and listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR.[10,11] Although the buildout years of many of these related projects are uncertain and may well be beyond the Project's

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[10] *The TAG requires proposed projects to consider related development projects within a half-mile radius of the project site and a quarter-mile radius from the farthest outlying study intersection. The 0.8-mile radius from the Project Site reflects a half-mile radius from the Project site extended to a quarter-mile radius from the farthest outlying study intersection, Alameda Street & 7th Street.*

[11] *The DTLA 2040 Plan is a combined update to the Central City Community Plan and Central City North Community Plan currently being prepared by the City for which: (1) an EIR has been prepared; (2) the City Planning Commission recommended approval on September 23, 2021; and (3) the City Council adopted on May 3, 2023. The Community Plan Update will be a long-range plan designed to accommodate growth in Downtown Los Angeles until 2040, which is project to include an additional estimated 125,000 people, 70,000 housing units, and 55,000 jobs by the year 2040 (the DTLA 2040 Plan's horizon year). However, only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2026, well before the DTLA 2040 Plan's 2040 horizon year. Furthermore, many of the balance of the 26 related projects identified in Table III-1 and in the Transportation Assessment are included in these growth projections because they are within the plan area. Accordingly, it can be assumed that the projected growth reflected by the list of related projects would account for any overlapping growth assumed by the DTLA 2040 Plan that is anticipated by the project completion year.*

buildout year, and notwithstanding that some may not be approved or developed, all related projects were considered.

(2) Transportation Infrastructure Projects

(a) Sixth Street Viaduct

Due to the rebuild of the Sixth Street Viaduct, access from Downtown Los Angeles and Boyle Heights/East Los Angeles along 6th Street/Whittier Boulevard was restricted in the existing year. However, the Transportation Assessment accounts for the bridge being open since the current construction schedule shows completion by mid-2022, and the bridge in fact reopened in July of 2022. The new Sixth Street Viaduct has the same number of lanes as the previous bridge. Enhancements to pedestrian and bicycle facilities are included, with dedicated bicycle lanes and wider sidewalks. In association with the rebuild of the Sixth Street Viaduct, public park space (called PARC) will be included along and adjacent to the bridge.

(b) Capital Transit Projects

Potential future expansions to the transit network under study by Metro include the B Line (Red)/D Line (Purple) extension into the Arts District along the Los Angeles River and the West Santa Ana Branch Transit Corridor along Alameda. The potential B Line (Red)/D Line (Purple) extension would include a station at 6th Street, approximately 0.25 mile from the Project Site.

(c) Capital Bicycle and Pedestrian Projects

As discussed above, the Mobility Plan identifies four types of bicycle facilities. Bicycle Paths are bicycle facilities outside of the roadway. Tier 1 Protected Bicycle Lanes are bicycle facilities on arterial roadways with physical separation from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are bicycle facilities on arterial roadways with striped separation. Tier 2 Bicycle Lanes are those most likely to be built by 2035. Mateo Street, Boyle Avenue, and 7th Street are part of the Tier 2 Bike Lane Network within the study area. In addition, the Los Angeles River Bicycle Path from Elysian Park to Maywood via Downtown/Arts District would provide more access to the Los Angeles River.

As also noted above, the NEN is the network of local-serving streets planned to contain traffic calming measures that provide connections within the protected bicycle lane system. Several streets in the study area are included within the NEN, including Mateo Street and Santa Fe Avenue.

(d) Signal at Santa Fe Avenue & Violet Street

The intersection of Santa Fe Avenue & Violet Street is currently minor street (Violet Street) stop-controlled. A signal is currently under construction as a result of Related Project No. 2. The Transportation Assessment assumes that the signal would be in operation and the intersection configuration used in future analyses is based on plans approved by the City.

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/traffic if it would:

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

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

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

Threshold (d): Result in inadequate emergency access

As previously discussed, SB 743 (PRC Section 21099(b)(1)) directed OPR to prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within TPAs. The revised guidelines are required to prohibit the consideration of automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, new CEQA Guidelines Section 15064.3(a), adopted in December 2018, states “a project’s effect on automobile delay does not constitute a significant environmental impact.” As noted above, on July 30, 2019, the City adopted VMT as a criterion in determining transportation impacts under CEQA and LADOT issued guidance on August 9, 2019. The analysis in this section and the Transportation Assessment, included as Appendix M.1 of this Draft EIR, uses the latest version of the TAG updated by LADOT in July 2020.

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

b. Methodology

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

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

(2) Vehicle Miles Traveled

(a) VMT Impact Thresholds

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds.[12] The TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the state's goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation

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

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.

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

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

Per the TAG, if a project includes less than 50,000 square feet of retail uses (including restaurants), then such retail uses are deemed to be small-scale or local-serving and are assumed to have less than significant VMT impacts.[13] 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.[14] This criterion was used for the restaurant component of the Project. The proposed high-turnover restaurant space (including under the future campus expansion scenario that includes 20,000 square feet of restaurant uses) is less than 50,000 square feet and is therefore considered to be local-serving under the TAG. Accordingly, per the TAG, VMT impacts from this portion of the Project would be less than significant.[15]

For mixed-use projects,[16] any reduction in daily trips and VMT due to internal capture between the project's land uses are considered, then each component is evaluated separately based on the impact criteria identified above for each individual land use.

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.

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[13] *LADOT, Transportation Assessment Guidelines, July 2019, p. 16.*

[14] *LADOT, Transportation Assessment Guidelines, July 2019, p. 19.*

[15] *LADOT, Transportation Assessment Guidelines, July 2019, p. 16.*

[16] *For purposes of VMT, "mixed-use" refers to any development with more than a single use.*

(b) VMT Analysis Methodology

LADOT developed City of Los Angeles VMT Calculator Version 1.3 (July 2020) (VMT Calculator) to assess the VMT impacts of proposed development projects within the City. The VMT Calculator also assesses the effectiveness of selected TDM measures proposed for a project based on available research. Analysis was conducted for the Project using the City's VMT analysis procedures and the VMT Calculator based on the Project's proposed land uses.

(i) Travel Behavior Zone

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as follows:

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

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

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

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

The VMT Calculator determines a Project's TBZ based on the latitude and longitude of the project address.

(ii) Mixed-Use Development Methodology[17]

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

[17] *For purposes of VMT, "mixed-use" refers to any development with more than a single use.*

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

(iii) Travel Demand Forecasting

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

(iv) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the United States Department of Energy, and other modeling resources.[18] As noted in the Transportation Assessment, the VMT Calculator was validated to Los Angeles conditions based on the empirical counts conducted at market rate residential, affordable housing, office, and mixed use sites throughout the City, regardless of the source of the rates used as a starting point. A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.

[18] *The draft 2022 LAUSD Developer Fee Justification Study and Trip Generation 11th Edition are now available, but City's VMT Calculator utilized the editions indicated herein.*

(v) Transportation Demand Management Measures

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:

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

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in the California Air Pollution Control Officers Association's Quantifying Greenhouse Gas Mitigation Measures.[19]

(3) Hazardous Geometric Design Features

The TAG includes a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle and pedestrian safety impacts, project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]) are reviewed. 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 are 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) and/or incompatible use.

[19] *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, August 2010.*

(4) Freeway Safety Analysis

If a freeway ramp analysis is required, the City's interim guidance provides the following steps to determine if the proposed 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% 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% 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 on the freeway mainline, then the location must be tested for safety issues which includes 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 necessary requirements are met, including, but not limited to, Caltrans defining the improvement cost, and opening a Project File/Project Account to accept a financial contribution for the improvement.

(5) Emergency Access

In consultation with the Los Angeles Fire Department (LAFD), the analysis of the Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. A determination was made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would implement the following Project Design Feature:

Project Design Feature TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include, but not necessarily be limited to, the following measures:

- As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;
- Provide off-site truck staging in a legal area furnished by the construction truck contractor;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences;
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods; and

- Describe the haul truck routes and avoid haul truck routes that travel passed Los Angeles Unified School District facilities.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Table 2.1-1 in the TAG identifies a series of City adopted programs, plans, ordinances, and policies that establish the transportation planning regulatory framework for development in the City. Attachment D to the TAG also provides a series of questions to help guide the review of the documents in Table 2.1-1. Those questions and their responses are provided in Appendix C of the Transportation Assessment included as Appendix M.1 of this Draft EIR.

Each of the documents listed in TAG Table 2.1-1 was reviewed for applicability to the Project, and the relevant transportation-related policies are described below, along with the Project's conformance. This evaluation was conducted by reviewing the following City documents: the Mobility Plan, Central City North Community Plan, Vision Zero, Plan for a Healthy Los Angeles, LAMC Section 12.21 A.16, LAMC 12.26J, Streetscape plans, Citywide Design Guidelines, MPP Section 321, and the TOC Guidelines. A summary is provided below and a detailed response to each topic in the TAG is provided in Appendix C of the Transportation Assessment included as Appendix M.1 of this Draft EIR.

The Project features and design generally support multimodal transportation options and would be consistent with policies, plans, and programs that support alternative transportation. The Project design includes features to minimize impacts to the public right-of-way and enhance the user experience by integrating multimodal transportation options. Specifically, the Project would enhance the pedestrian environment by adding street and pedestrian lighting around the Project Site, including low-level lighting along pathways for security and wayfinding, and improving streetscape with planted areas along the sidewalks along the Project frontage. The Project also proposes a full-width vacation of 7th Place within the Project Site and the eastern public alley running north/south between the terminus of 7th Place and Violet Street in order to convert the area to a paseo. The Project will maintain public access to the vacated portions of 7th Place and the eastern alley. These Project features not only enhance connectivity to the existing pedestrian network and within the Project Site but also encourage pedestrian activity. The vacation of 7th Place would not limit vehicular access as vehicles would be permitted to use 7th Place to access the existing Ford Factory Building parking garage, the loading docks for the

proposed new development, and, under the 7th Place driveway scenario, the parking garage for the proposed new development.

The existing right-of-way and roadway widths for 7th Place and Violet Street, which are classified as Collector streets, do not conform to the designated right-of-way and roadway width. The Project is currently requesting a waiver of the required dedications, based on the current street classifications to better align the street frontage along Violet Street and to enhance the pedestrian realm and connectivity along 7th Place. Santa Fe Avenue is classified as an Avenue II, and while the existing right-of-way conforms to the Avenue II dimensions, the existing roadway width does not. As part of the Vesting Tentative Tract Map (VTT-83332), the Project proposes a merger and resubdivision of existing areas previously dedicated along Santa Fe Avenue. These areas are located within the existing Ford Factory Building and are not able to be utilized by the City for widening or dedication purposes. The Draft Downtown Community Plan, which will replace the current Central City North Community Plan, is currently under development and includes proposed amendments to the Mobility Plan roadway designations. 7th Place and Violet Street would be reclassified as Local streets, which would bring the existing right-of-way and roadway widths into conformance with the Local Street dimensions. If these street reclassifications are adopted as part of the Downtown Community Plan, the Project would not be required to make any dedications.

The Project would support biking by providing bicycle parking spaces, a bicycle repair station, and lockers and showers via the fitness center available to building tenants. Under the 7th Place driveway scenario, the Project proposes to supply 1,264 on-site vehicle parking spaces for the Project, which is 60 less than the baseline required amount of 1,324 vehicle parking spaces by the LAMC. Under this scenario, the Project will provide 156 bicycle parking spaces (57 short-term and 99 long-term) as part of the first phase of and will provide an additional 84 bicycle parking spaces as part of the Future Campus Expansion Phase for a total of 240 bicycle parking spaces. The Project's provision of 240 bicycle parking spaces would permit the reduction of 60 vehicle parking spaces as the LAMC permits the provision of 4 bicycle parking spaces to offset 1 vehicle parking space. Under the Violet Street driveway scenario, the Project proposes to supply 1,264 on-site vehicle parking spaces, which is 55 less than the baseline required amount of 1,319 vehicle parking spaces by the LAMC. Under this scenario, the Project will provide 156 bicycle parking spaces (57 short-term and 99 long-term) as part of the first phase of development and an additional 64 bicycle parking spaces as part of the Future Campus Expansion Phase for a total of 220 bicycle parking spaces. The Project's provision of 220 bicycle parking spaces would permit the reduction of 55 vehicle parking spaces as the LAMC permits the provision of four bicycle parking spaces to offset one vehicle parking space. Additional bicycle parking for the Future Campus Expansion Phase would be provided as required by code based upon the uses developed.

The Project would comply with the City's TDM ordinance (i.e., LAMC Section 12.26J) with its design elements. Specifically, the Project would include bicycle parking in accordance with the LAMC, a commercial loading zone which permits passenger loading, paseos within the Project Site, a kiosk/bulletin board with transportation information, and designated parking spaces for employee carpools/vanpools and information about the preferential parking.

Under the 7th Place driveway scenario, the Project proposes one full-access driveway to the parking garage along 7th Place. Under the Violet Street driveway scenario, the Project proposes one full-access driveway to the parking garage along Violet Street. Under both driveway scenarios, primary service access would be provided via loading docks, located within the ground level of the Project's parking structure, and accessed via a separate driveway on 7th Place. Large truck deliveries would enter and exit the parking structure via the separate driveway on 7th Place and have turnaround capability provided within the Project Site. The Project also proposes a curbside commercial loading zone, which permits passenger loading, along Violet Street. Passenger and commercial loading activity would have a minimal impact on people walking and driving since the commercial loading zone would replace existing curbside parking, leaving sufficient room for through vehicular travel. In addition, the open plaza entrance to the Project Site would provide sufficient room for people walking. The Project would not substantially increase hazards, conflicts, or preclude City actions to fulfill or implement projects associated with these networks and will contribute to overall walkability through enhancements to the Project Site.

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

(2) Mitigation Measures

Impacts with respect to conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, 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

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's land uses and their respective sizes as the primary input and run for both driveway scenarios. Based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 0
- Total Employees: 3,626 (7th Place Driveway scenario)/3,618 (Violet Street Driveway scenario)
- APC: Central
- TBZ: Suburban Center

In addition, the following TDM reductions were taken in the VMT Calculator because they are required by code and/or inherent to the Project's design:

- Include bike parking per LAMC
- Include secure bike parking and showers

Using these assumptions, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario. Under both scenarios, the Project is estimated to generate 6.7 daily work VMT per employee, which is below the threshold of significance for the Central APC of 7.6 daily work VMT per employee, under either driveway scenario. Thus, the Project would not have a significant impact on daily work VMT per employee as estimated by the VMT Calculator. Since the retail components of the Project are less than 50,000 square feet under both driveway scenarios, they are considered to be local serving and would not generate a significant VMT impact (refer to Section 3.b.(2)(a), above). **Accordingly, per the TAG, VMT impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

As evaluated in the Initial Study for the Project, included as Appendix A of this Draft EIR, the Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. The proposed uses would also be consistent with the surrounding uses (i.e., residential and commercial) and would not introduce hazards due to incompatible uses.

The Project was analyzed with two driveway scenarios: the 7th Place driveway scenario includes a two-way full-access driveway on 7th Place; and the Violet Street driveway scenario includes a two-way full-access driveway on Violet Street. Both driveways would be located at ground level to serve the office and commercial employees, visitors, and patrons. Under both driveway scenarios, primary service access would be provided via loading docks located within the ground level of the Project's parking structure. Large truck deliveries would enter and exit the parking structure via a separate driveway on 7th Place and have turnaround capability provided within the Project Site. All of the Project's proposed driveways would be set at right-angles and would not restrict visibility. The driveways would be designed to comply with LADOT standards, and none of the Project frontages are along streets that are part of the HIN.

Based on the above, the Project, including the Future Campus Expansion Phase, would not substantially increase hazards due to a geometric design feature or incompatible uses.

The City's interim guidance on freeway safety analysis requires freeway off-ramps where a proposed project adds 25 or more trips in either the A.M. or P.M. peak hour to be studied for potential queuing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. Under both the 7th Place and Violet Street driveway scenarios, the Project is projected to add 25 or more trips to the following freeway off-ramps:

- US-101 Southbound Off-ramp to 7th Street (A.M. peak hour)
- I-10 Eastbound Off-ramp to Porter Street (A.M. and P.M. peak hours)
- I-10 Westbound Off-ramp to Mateo Street/Enterprise Street (A.M. peak hour)

Accordingly, each ramp is analyzed below.

(a) US-101 Southbound Off-ramp to 7th Street

The queue on the US-101 Southbound Off-ramp to 7th Street is projected to exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus Project scenarios. The Project is projected to add six car lengths (assuming an average queue storage length of 25 feet per car) to the Future Base queue in the A.M. peak hour under both the 7th Place and Violet Street driveway scenarios. Since the Project is projected to increase the overflow onto the mainline lanes by more than two car lengths, this location required further analysis.

The US-101 Southbound Off-ramp to 7th Street was tested for safety issues by assessing the speed differential between the off-ramp queue and the mainline of the freeway during the A.M. peak hour. Per the guidance, Caltrans PeMS data were used to identify freeway operating speeds during the A.M. peak hour. The PeMS data showed that the average mainline speed on the US-101 south near the 7th Street off-ramp during the A.M. peak hour is approximately 57 mph. Assuming that the traffic queued on the ramp is traveling at zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue during the A.M. peak hour at the US-101 Southbound Off-ramp to 7th Street. Impacts would be significant prior to mitigation.

(b) I-10 Eastbound Off-ramp to Porter Street

The queue on the I-10 Eastbound Off-ramp to Porter Street is projected to exceed ramp capacity in the A.M. peak hour but not in the P.M. peak hour in the Future plus Project scenario under both the 7th Place and Violet Street driveway scenarios. The Project is projected to add three car lengths under the 7th Place driveway scenario and four car lengths under the Violet Street driveway scenario (assuming an average queue storage length of 25 feet per car) to the Future Base queue in the A.M. peak hour. Although the I-10 Eastbound Off-ramp is connected to collector-distributor lanes (rather than the mainline of the freeway), since vehicles can travel at high speeds on these lanes, the collector-distributor lanes were considered as mainline lanes to take a conservative approach. Since the Project is projected to add more than two car lengths to the Future Base queue and, as a result, cause the off-ramp queue to overflow onto the collector-distributor lanes, this location required further analysis.

The I-10 Eastbound Off-ramp to Porter Street was tested for safety issues by assessing the speed differential between the off-ramp queue and the mainline of the freeway during the A.M. peak hour. Per the guidance, Caltrans PeMS data were used to identify freeway operating speeds during the A.M. peak hour. The PeMS data showed that the average mainline speed on the I-10 East near the Porter Street off-ramp during the A.M. peak hour is approximately 66 mph. Assuming that the traffic queued on the ramp is traveling at zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue during the A.M. peak hour at the I-10 Eastbound Off-ramp to Porter Street. Impacts would be significant prior to mitigation.

(c) I-10 Westbound Off-ramp to Mateo Street/Enterprise Street

The queue on the I-10 Westbound Off-ramp to Mateo Street/Enterprise Street is projected to exceed ramp capacity in the A.M. peak hour in the Future Base and Future plus Project scenarios. Under the 7th Place driveway scenario, the Project is projected to add five car lengths (assuming an average queue storage length of 25 feet per car) to the queue in the A.M. peak hour. Under the Violet Street driveway scenario, the Project is projected to add three car lengths (assuming an average queue storage length of 25 feet per car) to the queue in the A.M. peak hour. Similar to the I-10 Eastbound Off-ramp to Porter Street, the I-10 Westbound Off-ramp to Mateo Street/Enterprise Street is connected to collector-distributor lanes, but these lanes were considered as mainline lanes for the purposes of this analysis. Since the Project is projected to increase the Future Base overflow onto the collector-distributor lanes by more than two car lengths, this location required further analysis.

The I-10 Westbound Off-ramp to Mateo Street/Enterprise Street was tested for safety issues by assessing the speed differential between the off-ramp queue and the mainline of the freeway during the A.M. peak hour. Per the guidance, Caltrans PeMS data were used to identify freeway operating speeds during the A.M. peak hour. The PeMS data showed that the average mainline speed on the I-10 West near the Mateo Street/Enterprise Street off-ramp is approximately 54 mph during the A.M. peak hour. Assuming that the traffic queued on the ramp is traveling at zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue at I-10 Westbound Off-ramp to Mateo Street/Enterprise Street. Impacts would be significant prior to mitigation.

(2) Mitigation Measures

The following Mitigation Measures are proposed with respect to freeway safety impacts:

Mitigation Measure TR-MM-1: The Applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the US-101

Southbound Off-ramp and 7th Street. This shall require complying with the Caltrans project development process as a local agency-sponsored Project.

Mitigation Measure TR-MM-2: The Applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the I-10 Eastbound Off-ramp and Porter Street. This shall require complying with the Caltrans project development process as a local agency-sponsored Project. Because of the proximity to other intersections, close signal coordination is recommended with nearby intersections.

Mitigation Measure TR-MM-3: The Applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the I-10 Westbound Off-ramp and Mateo Street/Enterprise Street. This shall require complying with the Caltrans project development process as a local agency-sponsored Project.

(3) Level of Significance After Mitigation

(a) US-101 Southbound Off-ramp to 7th Street

As shown in Tables 4A and 4B of the Transportation Assessment, implementation of Mitigation Measure TR-MM-1 would reduce the A.M. peak hour off-ramp queue such that it would no longer extend onto the freeway mainline and would mitigate the Project impact in the Future plus Project scenario under both the 7th Place and Violet Street driveway scenarios. However, since the improvement involves another jurisdiction (i.e., Caltrans) beyond the City of Los Angeles, implementation cannot be guaranteed. Therefore, impacts are concluded to be significant and unavoidable.

(b) I-10 Eastbound Off-ramp to Porter Street

As shown in Tables 4A and 4B of the Transportation Assessment, implementation of Mitigation Measure TR-MM-2 would reduce the A.M. peak hour off-ramp queue such that it would no longer extend onto the freeway mainline and would mitigate the Project impact in the Future plus Project scenario under both the 7th Place and Violet Street driveway scenarios. However, since the improvement involves another jurisdiction (i.e., Caltrans) beyond the City of Los Angeles, implementation cannot be guaranteed. Therefore, impacts are concluded to be significant and unavoidable.

(c) I-10 Westbound Off-ramp to Mateo Street/Enterprise Street

As shown in Tables 4A and 4B of the Transportation Assessment, implementation of Mitigation Measure TR-MM-3 would reduce the off-ramp queue such that it would no longer extend onto the freeway mainline and would mitigate the Project impact in the Future plus Project scenario under both the 7th Place and Violet Street driveway scenarios. However, since the improvement involves another jurisdiction (i.e., Caltrans) beyond the City of Los

Angeles, implementation cannot be guaranteed. Therefore, impacts are concluded to be significant and unavoidable.

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

As discussed in the Initial Study included as Appendix A of this Draft EIR, according to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are US-101, I-10, and I-5, which are all accessible within less than one mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile west of the Project Site. While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Project's Construction Traffic Management Plan prepared and approved by the LADOT pursuant to Project Design Feature TR-PDF-1. The Project's Construction Traffic Management Plan would require review and approval from LADOT prior to the start of construction to ensure that adequate and safe access will remain available within and near the Project Site during construction activities. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Lastly, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. Impacts regarding inadequate emergency access would be less than significant, and no mitigation measures are required.**

e. Cumulative Impacts

(1) Impact Analysis

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

The TAG states that the review of plans, ordinances, and policies to assess potential conflicts with proposed projects should be an assessment of potential cumulative impacts that may result from a proposed project in combination with other development projects in the study area. For example, a cumulative impact could occur if the project as well as other future development projects located on the same block were to preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework.

The nearest related development project to the Project Site is Related Project No. 19, the Rendon Hotel Project, located at 2053 East 7th Street across 7th Street from the Project Site.[20] However, Related Project No. 19 would not share frontage with the proposed new construction within the Project Site. This related project would provide parking off-site through a private agreement and would eliminate an existing vehicular driveway along Santa Fe Avenue. A valet drop-off area is proposed along Santa Fe Avenue, north of 7th Street, adjacent to the related project site. No cumulative impacts with the Project are anticipated as the majority of Related Project No. 19's vehicular activity is projected to occur on Santa Fe Avenue, north of 7th Street, and along 7th Street, based on the proposed valet drop-off zone and the related project transportation assessment, whereas the majority of the Project traffic will utilize Mateo Street and Santa Fe Avenue, south of 7th Street, to either 7th Place for the 7th Place driveway scenario or Violet Street for the Violet Street driveway scenario. No significant cumulative impacts are anticipated to which both the Project and other nearby related projects would contribute regarding City transportation policies or standards adopted to protect the environment and support multimodal transportation options.

Thus, Project impacts with regard to conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) Vehicle Miles Traveled

A development project would have a cumulative VMT impact if it were deemed inconsistent with SCAG's RTP/SCS, the regional plan to reach state air quality and greenhouse gas 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. Additionally, the Project is in an infill location with convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, VMT, and GHG emissions. Furthermore, as described in detail above, the Project's retail and restaurant uses will be local-serving and are therefore not considered for purposes of identifying significant work VMT impacts, as those trips are assumed to have a negligible effect on regional VMT. When considered with the related projects, most of which propose additional residential development near the Project Site, the Project would help to provide local retail and dining options to the new residents and office employees in the area. **Therefore, Project impacts with respect to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.**

[20] *City of Los Angeles, Mitigated Negative Declaration, Rendon Hotel Project, February 2021.*

(c) Hazardous Geometric Design Features

According to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts. However, there are no related projects with access points along the same blocks as the Project. Furthermore, as discussed above, the Project would not result in a significant impact associated with hazardous geometric design features. Project impacts with respect to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.

As discussed above and shown in shown in Tables 4A and 4B of the Transportation Assessment, Mitigation Measures TR-MM-1 through TR-MM-3 would reduce off-ramp queues onto the freeway mainlines to less than what would occur under the Future Base and Future plus Project scenarios and the Project's contribution would not be cumulatively considerable if Mitigation Measures TR-MM-1 through TR-MM-3 are implemented. However, since the improvements involve another jurisdiction (i.e., Caltrans) beyond the City of Los Angeles, implementation cannot be guaranteed. **Therefore, Project impacts related to freeway safety are concluded to be significant and unavoidable.**

(e) Emergency Access

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the 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, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

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

Mitigation Measures TR-MM-1 through TR-MM-3 would reduce off-ramp queues onto the freeway mainlines to less than what would occur under the Future Base and Future plus Project scenarios and the Project's contribution would not be cumulatively considerable. Such improvements involve another jurisdiction (i.e., Caltrans) beyond the City of Los Angeles.

(3) Level of Significance after Mitigation

Impacts with respect to conflicts with adopted plans, programs, ordinances, and policies; VMT; hazardous geometric design features; and inadequate emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required and the impact levels remain less than significant.

Impacts with respect to freeway safety would be significant and unavoidable because the improvements contemplated by Mitigation Measures TR-MM-1 through TR-MM-3 involve another jurisdiction (i.e., Caltrans) beyond the City of Los Angeles, and therefore implementation of these improvements cannot be guaranteed.