IV. Environmental Impact Analysis
J. Transportation/Traffic

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts on transportation and traffic. This section is based on the *Traffic Impact Study—222 West 2nd Project* (Traffic Study) dated December 20, 2018, prepared by Linscott, Law & Greenspan, and provided in Appendix L.1 of this Draft EIR. The Traffic Study follows the Los Angeles Department of Transportation (LADOT) *Transportation Impact Study Guidelines* (December 2016), which establish the guidelines for determining the appropriate traffic analysis for a project, analysis methodologies, significance thresholds, etc., and is consistent with the traffic impact assessment guidelines set forth in the Los Angeles County Congestion Management Program (CMP). The scope of analysis for the Traffic Study was developed in consultation with LADOT staff. The base assumptions and technical methodologies (e.g., trip generation, study locations, analysis methodology, etc.) were identified as part of the study approach and were outlined in a Memorandum of Understanding (MOU) dated June 2016, which was reviewed and approved by LADOT. A copy of the MOU is provided in Appendix A of the Traffic Study. LADOT reviewed and approved the Traffic Study prior to circulation of this Draft EIR. A copy of LADOT's Assessment Letter (dated December 27, 2018) is included as Appendix L.2 of this Draft EIR.

The Traffic Study evaluates the potential for impacts caused by the Project on the street system surrounding the Project Site. The following analysis conditions are analyzed:

- Existing Conditions (2017)—Due to extensive ongoing construction affecting roadways and intersections in the immediate vicinity of the Project Site, it was determined in consultation with LADOT staff that use of historical count data (ranging from year 2009 to year 2015) would be necessary for some of the study intersections. However, for those locations where historical count data were not available, new traffic counts were conducted in year 2016. All of the historical and new count data have been adjusted by a one percent per year ambient traffic growth factor to reflect existing year 2017 traffic conditions. Additionally, the traffic count database was reviewed and balanced to ensure traffic flow consistency between the study locations. Manual counts of vehicular turning movements for each of the study intersections was conducted during the weekday A.M. (7:00 to 10:00 A.M.) and P.M. (3:00 to 6:00 P.M.) peak periods when

schools were in session. Intersection lane configurations are provided in the Traffic Study.

- Existing With Project Conditions (2017)—This analysis evaluates potential Project-related traffic impacts as compared to existing conditions during the typical weekday A.M. and P.M. peak periods. In this scenario, the net traffic generated by the Project is added to the Existing Conditions traffic volumes.

- Existing With Project With Mitigation Conditions (2017)—This analysis projects the potential intersection operating conditions that could be expected if the Project were built under existing conditions, including the effect of any mitigation. In this analysis, Project-generated traffic with mitigation incorporated is added to the Existing Conditions traffic volumes.

- Future Without Project Conditions (2025)—This analysis condition projects the future traffic growth and intersection operating conditions during the typical weekday A.M. and P.M. peak periods that could be expected as a result of regional growth and related projects in the vicinity of the study area by year 2025 (i.e., the Project buildout year).

- Future With Project Conditions (2025)—This analysis projects the potential intersection operating conditions when the Project is occupied in 2025. In this scenario, the traffic generated by the Project is added to Future Without Project conditions.

- Future With Project With Mitigation Conditions (2025)—This analysis projects the potential intersection operating conditions when the Project is occupied in 2025, including the effect of any mitigation. In this analysis condition, the Project-generated traffic with mitigation incorporated is added to the Future Without Project conditions.

California Senate Bill (SB) 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research (OPR) to change the way public agencies evaluate the transportation impacts of development projects under the California Environmental Quality Act (CEQA). Under SB 743, the focus of transportation analyses will shift from driver delay, which is typically measured by traffic level of service (LOS), to new criteria that promote the reduction of greenhouse gas (GHG) emissions, the development of multi-modal transportation networks, and a diversity of land uses. Since 2014, OPR has been developing guidelines and recommendations to replace LOS with vehicle miles traveled (VMT) as the primary measure of transportation impacts. In November 2017, OPR submitted to the California Natural Resources Agency (Resources Agency) proposed amendments to the CEQA Guidelines that include new Section 15064.3, which would govern how VMT-based analyses of potential traffic impacts should be conducted. On January 26, 2018, the Resources Agency published a Notice of Rulemaking, commencing

the formal rulemaking process for the amendments to the CEQA Guidelines. In November 2018, the Resources Agency finalized the amendments to the CEQA Guidelines and submitted them to the Office of Administrative Law (OAL). Approval of the CEQA Guidelines amendments is expected to be imminent.

In the meantime, while OPR has been developing guidance on VMT analyses under SB 743, local jurisdictions have had time to establish appropriate analytical VMT methodologies. The City of Los Angeles (City) is currently in the process of updating its travel demand model, impact evaluation methodology, and transportation impact thresholds based on VMT, as discussed further below. The California Department of Transportation (Caltrans) also is pursuing VMT as a metric of project impacts to better align with the State's multi-modal transportation and environmental actions goals, which is outlined in an interim guide but has no specific adopted methodology.[1] The transportation analysis in the Project's Traffic Study is, therefore, based on currently adopted rules and policies based on LOS. The analysis does, however, recognize the benefits of transit-oriented development and address relevant goals of reducing VMT.

SB 743 also added Section 21099 to the Public Resources Code (PRC), which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."[2] A transit priority area is defined as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."[3] PRC Section 21064.3 defines a major transit stop 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."[4] PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed or a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.[5]

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[1] *Caltrans, Local Development—Intergovernmental Review Program Interim Guidance, approved November 2016.*

[2] *California Public Resources Code, Section 21099(d)(1).*

[3] *California Public Resources Code, Section 21099(a)(7).*

[4] *California Public Resources Code, Section 21064.3.*

[5] *California Public Resources Code, Section 21099(a)(4).*

The Project is a mixed-use development that proposes 107 residential units, 7,200 square feet of commercial retail uses, and 534,044 square feet of office uses. The Project would be designed to maximize walking, bicycling, and the use of transit, thus reducing and minimizing vehicle trips using a multi-modal transportation strategy. The Project Site is located approximately 700 feet from the Los Angeles County Metropolitan Transportation Authority (Metro) Civic Center/Grand Park Purple and Red Line station (located at the southwest corner of 1st Street and Hill Street) and 0.48 mile from the Metro Pershing Square Purple and Red Line station. The Project Site is also the future site of the Metro Regional Connector 2nd Street/Broadway rail station and portal, which is currently under construction. The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway. Additional Metro Regional Connector stations are under construction at 2nd Street/Hope Street and 1st Street/Central Avenue, which are both within a 0.5-mile radius of the Project Site. The Project Site is also served by a number of bus lines, the majority of which provide frequency of service intervals of 15 minutes or less during the A.M. and P.M. peak commute periods. Therefore, the Project is located in a transit priority area, as defined in PRC Section 21099(a) and as shown in Figure IV.A-1 in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading) of this Draft EIR.[6] As such, the Project's parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Notwithstanding the provisions of PRC Section 21099, Project parking is still required to meet the vehicle and bicycle parking standards of the Los Angeles Municipal Code (LAMC). Accordingly, an analysis of parking is provided below for informational purposes.

2. Environmental Setting

a. Regulatory Framework

(1) Congestion Management Program

The Los Angeles County Congestion Management Program is a state-mandated program enacted by the California legislature to address the increasing concern that urban congestion is affecting the economic vitality of the State and diminishing the quality of life in some communities. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. Within Los Angeles County, Metro is responsible for planning and managing vehicular congestion and coordinating regional transportation policies. Metro prepared the 2010 CMP for Los Angeles County in

[6] *The City's ZIMAS System confirms the location of the Project Site within a Transit Priority Area. See Zoning Information No. 2452 and Parcel Profile Report for 213 Spring Street (www.zimas.lacity.org).*

accordance with Section 65089 of the California Government Code. The CMP also promotes transportation projects eligible to compete for state gasoline tax funds and develops a partnership among transportation decision-makers to devise appropriate multi-modal transportation solutions.

The CMP requires that certain new development projects analyze potential project impacts on CMP monitoring locations if an EIR is prepared for the project. Specifically, the CMP project Transportation Impact Analysis (TIA) guidelines require that the traffic study analyze traffic conditions at all CMP arterial monitoring intersections where a project will add 50 or more trips to adjacent street traffic during either the A.M. or P.M. weekday peak hours.

The CMP TIA guidelines also require that a traffic study analyze traffic conditions at all CMP mainline freeway monitoring locations (i.e., the freeway segment between off-ramps) where a project will add 150 or more trips in either direction during either A.M. or P.M. weekday peak hours. If based on these criteria, a traffic study identifies no facilities for study, then no further CMP traffic analysis is required.

The CMP further requires that a transit system analysis be performed to determine whether a project adds ridership that exceeds the capacity of the transit system. For a description of the existing CMP locations and the transit system in the Project area, refer to Subsection 2.c.(3), below.

(2) Southern California Association of Government 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

In April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016–2040 RTP/SCS presents a long-term vision for the region's transportation system through the year 2040 and identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, SB 375 requires SCAG and other Metropolitan Planning Organizations (MPOs) throughout the State to develop a Sustainable Communities Strategy to reduce per capita GHG emissions through integrated transportation, land use, housing, and environmental planning.[7] Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully

[7] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 166.*

planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[8] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.[9] The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS.[10,11] Please refer to Section IV.F, Land Use, for a detailed discussion of the provisions of the 2016–2040 RTP/SCS that apply to the Project.

(3) City of Los Angeles General Plan Framework Element, Transportation Element, and Mobility Plan 2035

The City's General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. The goals, objectives, policies, and related implementation programs of the Framework Element's Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999.

In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which is an update to the Transportation Element. The City Council has adopted several amendments to the Mobility Plan since its adoption, including the most recent amendment on September 7, 2016.[12] 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 includes objectives and policies to support the achievement of those goals. Accordingly, the goals of the Framework Element Transportation Chapter are now implemented through the Mobility Plan. Refer to Section IV.F, Land Use, of this Draft EIR for a discussion of the Project's consistency with the Framework Element Transportation Chapter and the Mobility Plan.

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[8] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 189.*

[9] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 76.*

[10] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

[11] *Los Angeles County Metropolitan Transportation Authority, High Quality Transit Areas—Southeast Quadrant (map).*

[12] *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.*

The street classifications and associated street standards originally designated in the General Plan Transportation Element were modified in the Mobility Plan in an effort to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Roadways are defined as follows in the Mobility Plan:

- Freeways—High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.

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

  - Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:

    - Boulevard I provide up to four travel lanes in each direction with a target operating speed of 40 miles per hour (mph).

    - Boulevard II provide up to three travel lanes in each direction with a target operating speed of 35 mph.

  - Avenues pass through both residential and commercial areas and include three categories:

    - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.

    - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.

    - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.

- 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. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.

- Local Streets—Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local streets can be:

  - Continuous local streets that connect to other streets at both ends, and/or

  - Non-Continuous local streets that lead to a dead-end.

(4) Los Angeles Municipal Code

With regard to construction traffic, 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.

b. Study Area

A traffic analysis study area generally comprises those locations with the greatest potential to experience significant traffic impacts due to a project, as defined by the lead agency. In the traffic engineering practice, a study area generally includes those intersections that are:

- Immediately adjacent to or in close proximity to a project site;
- In the vicinity of a project site that are documented to have current or projected future adverse operational issues; or
- In the vicinity of a project site that are forecasted to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

Based on coordination with LADOT staff, 32 study intersections were identified for evaluation. These intersections are shown in Figure IV.J-1 on page IV.J-9 and listed below. All of the study intersections are signalized with the exception of Intersection No. 19.

- Intersection No. 1: Belmont Avenue/Loma Drive & Beverly Boulevard
- Intersection No. 2: Glendale Boulevard & Court Street/Laveta Terrace
- Intersection No. 3: Glendale Boulevard/Lucas Avenue & Beverly Boulevard/1st Street/2nd Street
- Intersection No. 4: Beaudry Avenue & 1st Street
- Intersection No. 5: Beaudry Avenue & 2nd Street
- Intersection No. 6: Beaudry Avenue & SR-110 SB Off-Ramp
- Intersection No. 7: Beaudry Avenue & 3rd Street/Miramar Street
- Intersection No. 8: Figueroa Street & 2nd Street

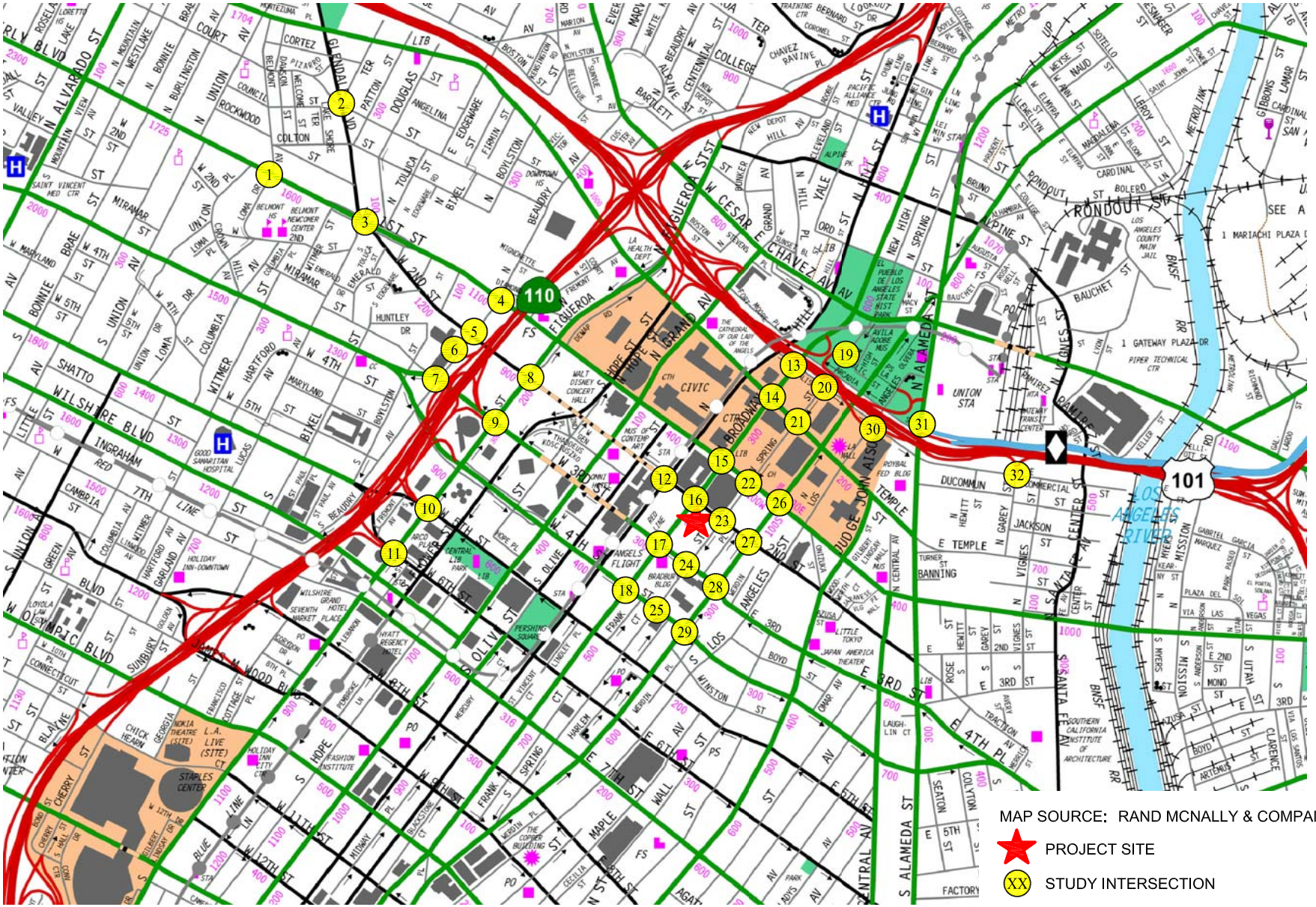

Figure IV.J-1
Study Area Intersections

Source: Linscott, Law & Greenspan, engineers, 2017.

- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps
- Intersection No. 10: Figueroa Street & SR-110 On-Ramps/5th Street
- Intersection No. 11: Figueroa Street & SR-110 Off-Ramps/6th Street
- Intersection No. 12: Hill Street & 2nd Street
- Intersection No. 13: Broadway & US-101 SB Off-Ramp/Aliso Street
- Intersection No. 14: Broadway & Temple Street
- Intersection No. 15: Broadway & 1st Street
- Intersection No. 16: Broadway & 2nd Street
- Intersection No. 17: Broadway & 3rd Street
- Intersection No. 18: Broadway & 4th Street
- Intersection No. 19: Spring Street & US-101 NB Off-Ramp
- Intersection No. 20: Spring Street & Aliso Street
- Intersection No. 21: Spring Street & Temple Street
- Intersection No. 22: Spring Street & 1st Street
- Intersection No. 23: Spring Street & 2nd Street
- Intersection No. 24: Spring Street & 3rd Street
- Intersection No. 25: Spring Street & 4th Street
- Intersection No. 26: Main Street & 1st Street
- Intersection No. 27: Main Street & 2nd Street
- Intersection No. 28: Main Street & 3rd Street
- Intersection No. 29: Main Street & 4th Street
- Intersection No. 30: Los Angeles Street & Aliso Street/US-101 SB On-Ramp
- Intersection No. 31: Alameda Street & Arcadia Street/US-101 NB Off-Ramp
- Intersection No. 32: US-101 SB Ramps/Garey Street & Commercial Street

The existing lane configurations for the 32 study intersections are depicted in Figure 4-1 of the Traffic Study provided in Appendix L.1 of this Draft EIR. It is noted that most streets in the Project area include traffic calming measures to encourage people to walk or bike instead of using a vehicle. In particular, streets within the Project vicinity provide on-street parking, sidewalks, marked crosswalks, and count-down signal timers, all of which are identified by the California Air Pollution Control Officers Association (CAPCOA) as traffic calming measures that reduce VMT.[13]

c. Existing Street Systems

The existing street system in the study area consists of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the study area, as described further below.

(1) Freeways

Regional access to the Project Site is provided by the Hollywood Freeway (US-101), Santa Monica Freeway (I-10), and Pasadena/Harbor Freeway (SR-110/I-110). Brief descriptions of these freeways are provided below:

- Hollywood Freeway (US-101)—The Hollywood Freeway is generally a north-south oriented freeway connecting Downtown Los Angeles to the San Fernando Valley within the City of Los Angeles region. Located approximately 0.4 mile northeast of the Project Site, the Hollywood Freeway alignment runs in a northwest to southeast direction in the Project area. Four mainline travel lanes are provided in each direction. Near the Project Site, on and/or off-ramps are provided at Broadway/Aliso Street, Spring Street, Los Angeles Street, and Alameda Street.

- Santa Monica Freeway (I-10)—The Santa Monica Freeway is a major east-west oriented freeway connecting Santa Monica to the west and the Inland Empire to the east. The Santa Monica Freeway generally contains four mainline freeway lanes in each direction along with auxiliary lanes in the Downtown area. In the eastbound direction near the Project Site (approximately 1.9 miles to the south), off-ramps are provided at Grand Avenue and Maple Avenue. In the westbound direction (also to the south as well as the southwest), off-ramps are provided at Los Angeles Street and Hoover Street/20th Street. Additional on/off-ramps are located south of the Project Site.

[13] *CAPCOA Quantifying Greenhouse Gas Mitigation Measures, p. 190.*

- Pasadena/Harbor Freeway (SR-110/I-110)—The Pasadena/Harbor Freeway is a major north-south oriented freeway connecting Pasadena to the north with the San Pedro area to the south. The Pasadena/Harbor Freeway contains four mainline freeway lanes in each direction near the Project Site (approximately 0.6 mile to the west). The Harbor Freeway Transitway (which requires the use of a FasTrak Flex transponder), located south of the Project Site and Downtown Los Angeles, includes two elevated express lanes in each direction. Near the Project Site, on and/or off-ramps are provided at 3rd Street, 4th Street, 5th Street, and 6th Street.

(2) Streets

The roadways providing access to the Project Site are summarized in Table IV.J-1 on page IV.J-13.

(3) Other Regional Transportation System Elements

As discussed above, primary regional access to the Project area is provided by the Hollywood, Santa Monica, and Pasadena/Harbor Freeways, described above.

(a) Congestion Management Program Facilities

The closest CMP mainline freeway monitoring locations to the Project Site are US-101 north of Vignes Street, SR-110 south of US-101, and SR-110 at Alpine Street. The closest CMP intersections to the Project Site are Alameda Street & Washington Boulevard and Alvarado Street & Sunset Boulevard.

(b) Transit System

The study area is well served by public transit, including both bus and rail service. Public bus service is currently provided by Metro and LADOT DASH Transit Service, as well as Antelope Valley Transit, Big Blue Bus, Commerce Bus, Gardena Bus, Montebello Bus, Santa Clarita Transit, Foothill Transit, Orange County Transportation Authority (OCTA), and Torrance Transit Service. A summary of the primary lines operated by Metro, LADOT Commuter Express, and LADOT DASH that serve the Project area is provided below:

- Metro 2/302—Route 2/302 travels between Pacific Palisades and Downtown with 3 to 6 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Hill Street, 4th Street, 3rd Street, 2nd Street, 1st Street, Temple Street, and Arcadia Street in the vicinity of the Project Site.

Table IV.J-1
Existing Roadway Descriptions

Roadway	Classification[a]	Travel Lanes		Median Types[d]	Speed Limit
		Direction[b]	No. Lanes[c]		
Belmont Ave. (Beverly Blvd. to Rockwood St.)	Collector Street	NB–SB	2	N/A	25
Loma Dr.	Collector Street	NB–SB	2	N/A	25
Glendale Blvd.	Modified Boulevard II	NB–SB	4	2WLT/N/A	35
Lucas Ave.	Avenue II	NB–SB	2	N/A	25
Beaudry Ave. (6th St. to 1st St.)	Avenue II	NB–SB	3–4[e]	N/A	25
Beaudry Ave. (1st St. to Temple St.)	Avenue I	NB–SB	4	2WLT	25
Figueroa St. (Wilshire Blvd. to Temple St.)	Boulevard II	NB–SB	4–5[f,g,h,o,p]	N/A	35
Hill St. (Olympic Blvd. to US-101 Fwy.)	Modified Avenue II	NB–SB	4[i]	2WLT/N/A	25
Broadway (I-10 to Temple St.)	Modified Avenue II	NB–SB	3–4[o]	N/A	25
Broadway (Temple St. to Cesar E. Chavez Ave.)	Avenue II	NB–SB	3–4[o]	N/A	25
Spring St. (1st St. to Cesar E. Chavez Ave.)	Avenue I	SB	3[o,p]	N/A	25
Spring St. (9th St. to 1st St.)	Modified Avenue II	SB	3[k,o]	N/A	25
Main St. (1st St. to Temple St.)	Modified Avenue I	NB	4[o]	N/A	25
Main St. (9th St. to 1st St.)	Avenue II	NB	3[l,o]	N/A	25
Los Angeles St. (2nd St. to Temple St.)	Modified Avenue I	NB–SB	4[o]	RMI/N/A	25
Los Angeles St. (Temple St. to Alameda St.)	Avenue I	NB–SB	4[o]	RMI/N/A	25
Alameda St.	Avenue I	NB–SB	4–6[p]	2WLT/RMI	35
Garey St.	Collector Street	NB–SB	2	N/A	25
Beverly Blvd. (Alvarado St. to Beaudry Ave.)	Boulevard II	EB–WB	4–6[m,n]	2WLT/N/A	35
Court St.	Collector Street	EB–WB	2	N/A	25
Laveta Terrace	Local Street	EB–WB	2	N/A	25
1st St. (Beaudry Ave. to Hill St.)	Boulevard II	EB–WB	4	N/A	35
1st St. (Hill St. to Judge John Aiso St.)	Modified Boulevard II	EB–WB	4	N/A	35

Table IV.J-1 (Continued)
Existing Roadway Descriptions

Roadway	Classification[a]	Travel Lanes		Median Types[d]	Speed Limit
		Direction[b]	No. Lanes[c]		
2nd St. (Glendale Blvd. to Figueroa St.)	Avenue II	EB–WB	3–4[o]	2WLT/N/A	25
2nd St. (Figueroa St. to Judge John Aiso St.)	Modified Avenue III	EB–WB	3[o]	N/A	25
3rd St. (Alvarado St. to Huntley Dr.)	Avenue II	EB–WB	4[m]	2WLT	35
3rd St. (Huntley Dr. to Figueroa St.)	Avenue II	EB	2[m]	N/A	25
3rd St. (Figueroa St. to Flower St.)	Modified Boulevard II	WB	3	N/A	25
3rd St. (Flower St. to Hope St.)	Modified Avenue II	WB	2–3	N/A	25
3rd St. (Hope St. to Los Angeles St.)	Modified Avenue III	WB	3–2[n]	N/A	25
4th St. (Boylston St. to Figueroa St.)	Avenue II	EB	2	N/A	25
4th St. (Figueroa St. to Hope St.)	Modified Avenue I	EB	1	N/A	25
4th St. (Hope St. to Grand Ave.)	Modified Boulevard II	EB	1–4	N/A	25
4th St. (Grand Ave. to Olive St.)	Modified Avenue I	EB	4	N/A	25
4th St. (Olive St. to Hill St.)	Modified Avenue II	EB	4	N/A	25
4th St. (Hill St. to Los Angeles St.)	Modified Avenue III	EB	4[j]	N/A	25
4th St. (Los Angeles St. to San Pedro St.)	Avenue III	EB	4[j]	N/A	25
5th St. (SR-110 to Figueroa St.)	Modified Avenue I	WB	4–2	N/A	25
5th St. (Figueroa St. to Flower St.)	Avenue I	WB	4–2	N/A	25
5th St. (Flower St. to Olive St.)	Modified Avenue II	WB	5	N/A	25
5th St. (Hill St. to Los Angeles St.)	Modified Avenue III	WB	4	N/A	25
6th St. (Alvarado St. to SR-110)	Avenue II	EB–WB	4	2WLT/N/A	25
6th St. (SR-110 to Flower St.)	Modified Avenue I	EB	2–4	N/A	25

Table IV.J-1 (Continued)
Existing Roadway Descriptions

Roadway	Classification[a]	Travel Lanes		Median Types[d]	Speed Limit
		Direction[b]	No. Lanes[c]		
6th St. (Flower St. to Los Angeles St.)	Modified Avenue III	EB	4	N/A	25
Temple St. (Rampart Blvd. to Broadway)	Avenue II	EB–WB	4	N/A	25
Temple St. (Broadway to Alameda St.)	Modified Avenue II	EB–WB	4	N/A	25
Aliso St.	Local Street	EB	2	N/A	25
Arcadia St.	Local Street	WB	3	N/A	25
Commercial St.	Collector Street	EB–WB	3–2	N/A	25

[a] Roadway classifications obtained from the City of Los Angeles Mobility Plan 2035, Adopted January 20, 2016.

[b] Direction of roadways in the project area: NB-SB—north and south bound; and EB-WB—east- and west-bound.

[c] Number of lanes in both directions on the roadway. Variations in number of travel lanes due to time restricted on-street parallel parking are noted below.

[d] Median type of the road: RMI—Raised Median Island; 2WLT—2-Way Left-Turn Lane; and N/A—Not Applicable.

[e] Tow Away No Parking 4 P.M.–6 P.M. in the northbound direction.

[f] Tow Away No Parking 8 A.M.–6 P.M. in the southbound direction.

[g] Tow–Away No Stopping 7 A.M.–5 P.M. in the northbound direction.

[h] Tow–Away No Parking 7 A.M.–9 A.M. and 3 P.M.–7 P.M. in the southbound direction.

[i] Tow–Away No Stopping 7 A.M.–9 A.M. and 4 P.M.–7 P.M. in the southbound direction.

[j] Tow–Away No Stopping 7 A.M.–9 A.M. and 4 P.M.–6 P.M. in the westbound direction.

[k] Tow–Away No Stopping 7 A.M.–9 A.M. and 4 P.M.–7 P.M. in the southbound direction.

[l] Tow Away No Stopping 4 P.M.–6 P.M. in the northbound direction.

[m] Tow Away No Stopping 4 P.M.–6 P.M. in the westbound direction.

[n] Tow–Away No Stopping 7 A.M.–9 A.M. and 4 P.M.–6 P.M. in the eastbound direction.

[o] Bike Lane

[p] Bus Lane

Source: Linscott, Law & Greenspan, 2018.

- Metro 4—Route 4 travels between Santa Monica and Downtown with 5 to 7 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Hill Street, 4th Street, 3rd Street, 2nd Street, 1st Street, and Temple Street in the vicinity of the Project Site.

- Metro 14—Route 14 travels between Beverly Hills and Downtown with 9 to 12 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Beaudry Avenue and 1st Street in the vicinity of the Project Site.

- Metro 20—Route 20 travels between Santa Monica and Downtown with 5 to 10 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Figueroa Street and Wilshire Boulevard in the vicinity of the Project Site.

- Metro 28—Route 28 travels between Century City and Eagle Rock via Downtown with 5 to 7 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Spring Street, Broadway, 4th Street, 1st Street, Temple Street, and Arcadia Street in the vicinity of the Project Site.

- Metro 30/330—Route 30/330 travels between West Hollywood and East Los Angeles with 8 to 12 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Spring Street, 4th Street, 3rd Street, and 1st Street in the vicinity of the Project Site.

- Metro 37—Route 37 travels between Culver City and Historic South Central via Downtown with 7 to 11 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Beaudry Avenue and 1st Street in the vicinity of the Project Site.

- Metro 40—Route 40 travels between Redondo Beach and Downtown with 4 to 6 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Spring Street, Main Street, Alameda Street, and 1st Street in the vicinity of the Project Site.

- Metro 45—Route 45 travels between Rosewood and Lincoln Heights with 6 to 11 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Spring Street, 4th Street, 3rd Street, 2nd Street, 1st Street, and Temple Street in the vicinity of the Project Site.

- Metro 55/355—Route 55/355 travels between Compton and Downtown with 4 to 8 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Figueroa Street, Spring Street, Main Street, 5th Street, 4th Street, 3rd Street, and 2nd Street in the vicinity of the Project Site.

- Metro 60—Route 60 travels between Long Beach and Downtown with 9 to 11 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Figueroa Street, 6th Street, 5th Street, 4th Street, 3rd Street, and 2nd Street in the vicinity of the Project Site.

- Metro 68—Route 68 travels between Montebello and Downtown with 4 to 5 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Spring Street, Main Street, 4th Street, 3rd Street, 2nd Street, 1st Street, and Temple Street in the vicinity of the Project Site.

- Metro 70—Route 70 travels between El Monte and Downtown with 5 to 6 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Spring Street, 1st Street, Temple Street, and Arcadia Street in the vicinity of the Project Site.

- Metro 71—Route 71 travels between City Terrace and Downtown with 2 to 4 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Spring Street, 1st Street, Temple Street, and Arcadia Street in the vicinity of the Project Site.

- Metro 76—Route 76 travels between El Monte and Downtown with 5 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Spring Street, 1st Street, Temple Street, and Arcadia Street in the vicinity of the Project Site.

- Metro 78/79/378—Route 78/79/378 travels between Arcadia and Downtown with 6 to 12 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Spring Street, Main Street, 1st Street, Temple Street, and Arcadia Street in the vicinity of the Project Site.

- Metro 81—Route 81 travels between South Los Angeles and Eagle Rock with 6 to 9 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Hill Street and 2nd Street in the vicinity of the Project Site.

- Metro 83—Route 83 travels between Eagle Rock and Downtown with 2 to 3 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Spring Street, 1st Street, Temple Street, Aliso Street, and Arcadia Street in the vicinity of the Project Site.

- Metro 92—Route 92 travels between Burbank and Downtown with 3 to 4 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Spring Street, Main Street, 4th Street, 3rd Street, 2nd Street, 1st Street, and Temple Street in the vicinity of the Project Site.

- Metro 96—Route 96 travels between Burbank and Downtown with 2 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Spring Street, 1st Street, Temple Street, and Arcadia Street in the vicinity of the Project Site.

- Metro 442—Route 442 travels between Hawthorne and Downtown with 2 northbound buses during the A.M. peak hour and 1 southbound bus during the P.M. peak hour. This line travels on Broadway and 1st Street in the vicinity of the Project Site.

- Metro 487/489—Route 487/489 travels between El Monte and MacArthur Park via Downtown with 2 to 7 buses per hour per direction during A.M. and P.M. peak

hours. This line travels on Broadway, Spring Street, 1st Street, and Temple Street in the vicinity of the Project Site.

- Metro 728 Rapid—Route 728 Rapid travels between Century City and Downtown with 5 to 7 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Spring Street, 4th Street, 1st Street, and Arcadia Street in the vicinity of the Project Site.

- Metro 745 Rapid—Route 745 Rapid travels between Harbor Gateway and Downtown with 6 to 9 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Broadway, Spring Street, 4th Street, 3rd Street, 1st Street, and Temple Street in the vicinity of the Project Site.

- Metro 770 Rapid—Route 770 Rapid travels between El Monte and Downtown with 5 to 6 buses per hour per direction during A.M. and P.M. peak hours. This line travels on Spring Street, Temple Street, and Arcadia Street in the vicinity of the Project Site.

- LADOT Commuter Express 409—Commuter Express 409 travels between Sylmar and Downtown with 3 southbound buses during the A.M. peak hour and 4 northbound buses during the P.M. peak hour. This line travels on Broadway and Temple Street in the vicinity of the Project Site.

- LADOT Commuter Express 419—Commuter Express 419 travels between Chatsworth and Downtown with 3 eastbound buses during the A.M. peak hour and 4 westbound buses during the P.M. peak hour. This line travels on Hill Street and Temple Street in the vicinity of the Project Site.

- LADOT Commuter Express 422—Commuter Express 422 travels between Thousand Oaks and Downtown with 3 westbound buses during the A.M. peak hour and 3 eastbound buses during the P.M. peak hour. This line travels on Broadway and Temple Street in the vicinity of the Project Site.

- LADOT Commuter Express 423—Commuter Express 423 travels between Thousand Oaks and the University of Southern California (USC) via Downtown with 5 eastbound buses during the A.M. peak hour and 5 westbound buses during the P.M. peak hour. This line travels on Broadway and Temple Street in the vicinity of the Project Site.

- LADOT Commuter Express 431—Commuter Express 431 travels between Westwood and Downtown with 2 eastbound buses during the A.M. peak hour and 2 westbound buses during the A.M. peak hour. This line travels on Spring Street and 1st Street in the vicinity of the Project Site.

- LADOT Commuter Express 437—Commuter Express 437 travels between Venice and Downtown with 3 eastbound buses during the A.M. peak hour and

2 westbound buses during the P.M. peak hour. This line travels on Spring Street and 1st Street in the vicinity of the Project Site.

- LADOT Commuter Express 438—Commuter Express 438 travels between Redondo Beach and Downtown with 6 northbound buses during the A.M. peak hour and 6 southbound buses during the P.M. peak hour. This line travels on Spring Street and Temple Street in the vicinity of the Project Site.

- LADOT Commuter Express 448—Commuter Express 448 travels between Rancho Palos Verdes and Downtown with 3 northbound buses during the A.M. peak hour and 3 southbound buses during the P.M. peak hour. This line travels on Spring Street and Temple Street in the vicinity of the Project Site.

- LADOT Commuter Express 534—Commuter Express 534 travels between Westwood and Downtown with 2 westbound buses during the A.M. peak hour and 2 eastbound buses during the P.M. peak hour. This line travels on Spring Street and 1st Street in the vicinity of the Project Site.

- LADOT DASH A—DASH A travels between Little Tokyo and City West with 8 buses per hour per direction during the A.M. and P.M. peak hours. This line travels on Figueroa Street, Broadway, Spring Street, Main Street, 4th Street, 2nd Street, and 1st Street in the vicinity of the Project Site.

- LADOT DASH B—DASH B travels between Chinatown and the Financial District with 7 buses per hour per direction during the A.M. and P.M. peak hours. This line travels on Spring Street, Main Street, and Temple Street in the vicinity of the Project Site.

- LADOT DASH D—DASH D travels between Union Station and South Park with 12 buses per hour per direction during the A.M. and P.M. peak hours. This line travels on Spring Street, Main Street, 4th Street, 3rd Street, 2nd Street, and 1st Street in the vicinity of the Project Site.

- LADOT DASH F—DASH F travels between the Financial District and Exposition Park via USC with 6 buses per hour per direction during the A.M. and P.M. peak hours. This line travels on Figueroa Street, 6th Street, 5th Street, and 4th Street in the vicinity of the Project Site.

For information regarding other transit lines operating in the study area, including OCTA, Foothill Transit, Antelope Valley Transit, Big Blue Bus, Commerce Bus, Gardena Bus, Montebello Bus, Santa Clarita Transit, and Torrance Transit, refer to Table 4-3 of the Traffic Study (Appendix L.1 of this Draft EIR). The transit routes within the Project area are depicted in Figure 4-2 of the Traffic Study.

With respect to rail service, Metro's Blue, Expo, Purple, and Red lines also are located in close proximity to the Project Site, with 11 to 15 trains per hour per direction during A.M. and P.M. peak hours. Currently, Metro's nearest station is the Purple/Red line station at Civic Center/Grand Park, located approximately two blocks from the Project Site. The Project Site is also located 0.48 mile from the Metro Pershing Square Purple/Red Line station. Further, as noted previously, the Project Site will house the Metro Regional Connector 2nd Street/Broadway rail station and portal, currently under construction. Upon completion, the Metro Regional Connector will consist of a 1.9-mile underground light-rail system connecting the Metro Gold Line to the 7th Street/Metro Center station. The Regional Connector includes the 2nd Street/Broadway rail station, as well as two additional new stations in the Downtown area. Additional Metro Regional Connector stations are under construction at 2nd Street/Hope Street and 1st Street/Central Avenue, which are both within a 0.5-mile radius of the Project Site.

Walk Score calculates a transit score based on the number and proximity of bus and rail routes, which generates a transit score of approximately 100 (considered "Rider's Paradise") out of 100 for the Project Site.[14]

d. Existing Parking and Access

As discussed in Section II, Project Description, of this Draft EIR, the northern portion of the Project Site consists of a former surface parking lot, which is currently in use as a staging and excavation area for construction of the Metro Regional Connector 2nd Street/Broadway rail station and portal. Pursuant to a right-of-entry agreement, Metro has had exclusive control and use of the surface parking area since March 2015 and will continue to use it as a construction staging/laydown location for the Regional Connector project until up to September 2021. At that time, control of the surface parking lot (with the exception of the portal area), will revert back to the Project Applicant. Metro's current plans call for the restoration of a paved surface area on those areas of the northern portion of the Project Site outside of the new Metro portal and plaza area following the completion Metro's construction activities. The surface parking lot previously included 99 vehicular parking spaces.

The southern portion of the Project Site contains a five-story, approximately 67-foot-tall parking structure that includes rooftop parking and two subterranean levels. The structure currently provides 1,460 vehicular spaces, which are used for parking by tenants of Los Angeles Times Square, subject to several off-site parking covenants recorded on the

[14] *Walk Score (www.walkscore.com) calculates the transit score of an address by locating nearby bus/rail transit routes and stops. Walk Score measures how easy it is to live a car-lite lifestyle.*

Project Site (County of Los Angeles Recorder Instrument Nos. 90-2043634, 97-1672752, 98-854779, and 05-1924091); as well as public and leased parking for other businesses, commuters, and residents in the immediate area. Access to the parking structure is provided via one driveway on Broadway and two driveways on Spring Street.

e. Existing Pedestrian and Bicycle Facilities

(1) Pedestrian Facilities

The Project Site is located within the Civic Center South area of Downtown. The Civic Center area experiences a high level of pedestrian activity, particularly along key corridors such as Broadway, Spring Street, and Main Street. Based on the existing level of pedestrian activity in the area, the proximity of nearby government offices, and, more importantly, the future Metro Regional Connector 2nd Street/Broadway rail station and portal on-site, it is anticipated that there will continue to be a high level of pedestrian activity in the Project area, including specifically to and from the Project Site. Existing pedestrian facilities near the Project Site include 12-foot wide sidewalks on Broadway, 12-foot wide sidewalks on 2nd Street, and 14-foot sidewalks on Spring Street.

(2) Bicycle Facilities

The federal and state transportation systems recognize three primary types of bikeway facilities: Bicycle Paths (Class I), Bicycle Lanes (Class II), and Bicycle Routes (Class III). Class I bike paths are exclusive car-free facilities that typically are physically separated from the roadway. Class II bike lanes are part of the street design and dedicated only for bicycle use, identified by a striped lane separating vehicle lanes from the bicycle lane. Class III bike routes generally are located on collector and lower volume arterial streets.

A number of existing and proposed bicycle facilities identified in the City's 2010 Bicycle Plan are located within an approximate 1-mile radius from the Project Site.[15] Immediately surrounding the Project Site, these include existing Tier 1 Protected Bicycle Lanes located on 2nd Street (from Beverly Boulevard to Main Street) and on Spring Street (from Cesar E. Chavez Avenue to Main Street).. The City's bicycle enhanced network (low stress network) in the Project area is shown in Figure 3-1 of the Traffic Study included as Appendix L.1 of this Draft EIR; the City's bicycle lane network in the Project area is illustrated in Figure 3-2 therein.

[15] *The 2010 Bicycle Plan goals and policies have since been folded into the Mobility Plan 2035 to reflect a commitment to a balanced, multi-modal viewpoint.*

Walk Score calculates bike scores based on topography, the number and proximity of bike lanes, and other cycling-related factors and gives the Project Site a bike score of approximately 79 ("Very Bikeable") out of 100.

f. Existing Traffic Conditions

(1) Analysis Methodology

As currently required by LADOT, existing traffic levels at the analyzed signalized intersections within the City of Los Angeles were evaluated using the Critical Movement Analysis (CMA) methodology, which determines volume-to-capacity (V/C) ratios on a critical movement basis. The overall intersection V/C ratio is subsequently assigned a level of service (LOS) value to describe intersection operations. LOS is a qualitative measure used to describe traffic flow conditions. Table IV.J-2 on page IV.J-23 defines the ranges of V/C ratios and their corresponding LOS. LOS definitions for signalized intersections range from excellent, nearly free-flow traffic at LOS A to stop-and-go conditions at LOS F.

(2) Existing Conditions (2017) Intersection Levels of Service

Due to extensive ongoing construction affecting roadways and intersections in the immediate Project vicinity, it was determined in consultation with LADOT staff that use of historical count data (ranging from year 2009 to year 2015) would be necessary for some of the study intersections. However, for those locations where historical count data were not available, new traffic counts were conducted in year 2016. All of the historical and new count data have been adjusted by a one percent per year ambient traffic growth factor to reflect existing year 2017 traffic conditions. Additionally, the traffic count database was reviewed and balanced to ensure traffic flow consistency between the study locations.

All of the vehicular turning movement counts at study intersections were conducted during the weekday A.M. and P.M. commute periods to determine the peak-hour traffic volumes. The manual counts were conducted by traffic count subconsultants at the study intersections from 7:00 to 10:00 A.M. to determine the weekday A.M. peak commute hour, and from 3:00 to 6:00 P.M. to determine the weekday P.M. peak commute hour. While traffic volumes at individual study intersections reflect varying A.M. and P.M. peak periods, the overall highest one-hour total of traffic volumes in the morning (i.e., the A.M. peak hour) generally occurs between 8:00 A.M. and 9:00 A.M., and the overall highest one-hour total of traffic volumes in the afternoon (i.e., the P.M. peak hour) generally occurs between 5:00 P.M. and 6:00 P.M., consistent with typical peak commute hours in a metropolitan area. It is noted that all of the traffic counts were conducted when local schools were in session. The existing peak-hour traffic volumes (highest volume hours within the peak periods) are illustrated in Table 5-1 of the Traffic Study included in Appendix L.1 of this Draft EIR.

Table IV.J-2
Level of Service Definitions for Signalized Intersections

Level of Service	Definition	V/C Ratio
A	EXCELLENT OPERATION. All approaches to the intersection appear quite open, turning movements are easily made, and nearly all drivers find freedom of operation.	<0.600
B	VERY GOOD OPERATION. Many drivers begin to feel somewhat restricted within platoons of vehicles. This represents stable flow. An approach to an intersection may occasionally be fully utilized and traffic queues start to form.	0.601–0.700
C	GOOD OPERATION. Occasionally drivers may have to wait for more than 60 seconds, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted.	0.701–0.800
D	FAIR OPERATION. Cars are sometimes required to wait for more than 60 seconds during short peaks. There are no long-standing traffic queues. This level is typically associated with design practice for peak periods.	0.801–0.900
E	POOR OPERATION. Some long-standing vehicular queues develop on critical approaches to intersections. Delays may be up to several minutes.	0.901–1.000
F	FORCED FLOW. Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the intersections approach lanes; therefore, volumes carried are not predictable. Potential for stop and- go type traffic flow.	> 1.000

Source: Transportation Research Board, Special Report 209, Highway Capacity Manual, 1985, and Circular 212, Interim Materials on Highway Capacity, 1982.

Table IV.J-3 on page IV.J-24 summarizes the existing weekday A.M. and P.M. peak-hour V/C ratio for the 32 study intersections and the corresponding LOS for each intersection. As shown therein, 30 of the 32 study intersections operate at LOS D or better during the A.M. and P.M. peak hours, with many operating at LOS A or B. The remaining two intersections operate at LOS F during the weekday P.M. peak hour under Existing Conditions:

- Intersection No. 8: Figueroa Street & 2nd Street (P.M.)
- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps (P.M.)

Table IV.J-3
Intersection Levels of Service—Existing Conditions (2017)

No.	Intersection	A.M. Peak		P.M. Peak	
		V/C	LOS	V/C	LOS
1	Belmont Ave./Loma Dr. & Beverly Blvd.	0.425	A	0.407	A
2	Glendale Blvd. & Court St./Laveta Terrace	0.469	A	0.368	A
3	Glendale Blvd./Lucas Ave. & Beverly Blvd./1st St./ 2nd St.	0.694	B	0.558	A
4	Beaudry Ave. & 1st St.	0.499	A	0.767	C
5	Beaudry Ave. & 2nd St.	0.640	B	0.896	D
6	Beaudry Ave. & SR-110 SB Off-Ramp	0.468	A	0.510	A
7	Beaudry Ave. & 3rd St./Miramar St.	0.761	C	0.519	A
8	Figueroa St. & 2nd St.	0.747	C	**1.059**	**F**
9	Figueroa St. & 3rd St./SR-110 Ramps	0.789	C	**1.131**	**F**
10	Figueroa St. & SR-110 On-Ramps/5th St.	0.563	A	0.835	D
11	Figueroa St. & SR-110 Off-Ramps/6th St.	0.672	B	0.614	B
12	Hill St. & 2nd St.	0.601	B	0.579	A
13	Broadway & US-101 SB Off-Ramp/Aliso St.	0.323	A	0.378	A
14	Broadway & Temple St.	0.550	A	0.565	A
15	Broadway & 1st St.	0.551	A	0.586	A
16	Broadway & 2nd St.	0.396	A	0.406	A
17	Broadway & 3rd St.	0.652	B	0.554	A
18	Broadway & 4th St.	0.305	A	0.442	A
19	Spring St. & US-101 NB Off-Ramp	0.387	A	0.251	A
20	Spring St. & Aliso St.	0.353	A	0.146	A
21	Spring St. & Temple St.	0.610	B	0.381	A
22	Spring St. & 1st St.	0.413	A	0.315	A
23	Spring St. & 2nd St.	0.466	A	0.376	A
24	Spring St. & 3rd St.	0.565	A	0.462	A
25	Spring St. & 4th St.	0.370	A	0.459	A
26	Main St. & 1st St.	0.334	A	0.545	A
27	Main St. & 2nd St.	0.301	A	0.581	A
28	Main St. & 3rd St.	0.626	B	0.789	C
29	Main St. & 4th St.	0.230	A	0.743	C
30	Los Angeles St. & Aliso St./US-101 SB On-Ramp	0.209	A	0.614	B
31	Alameda St. & Arcadia St./US-101 NB Off-Ramp	0.530	A	0.630	B
32	US-101 SB Ramps/Garey St. & Commercial St.	0.299	A	0.467	A

Source: Linscott, Law & Greenspan, 2018.

g. Future Without Project Conditions

(1) Analysis Methodology

(a) Future Traffic Volumes

The traffic volumes projected for the Future Without Project conditions take into account the expected changes in traffic over existing conditions from two primary sources: ambient growth in the existing traffic volumes due to the effects of overall regional growth and development outside the study area, as well as traffic generated by specific development projects in, or in the vicinity of, the study area. These factors are described below.

(i) Ambient Growth

Horizon year background traffic growth estimates were calculated using an ambient traffic growth factor. The ambient traffic growth factor is intended to account for typical growth in traffic volumes due to new development both inside and outside the study area. Ambient traffic growth in the Downtown Los Angeles area (i.e., included in Regional Statistical Area 23 [RSA 23]), which is presented in the 2010 CMP, indicates existing traffic volumes are expected to increase at an annual rate of approximately 0.20 percent per year between years 2010 and 2025. However, an annual growth rate of one percent through the year 2025 (i.e., the anticipated Project buildout year) was selected for this analysis in consultation with LADOT during the scoping process, in addition to traffic projected to be generated by the related projects identified in the study area. In general, known cumulative development projects should already be reflected in the growth rate projection based on adopted local and regional planning documents (which account for future population, housing, and employment projections). Therefore, application of a one percent ambient growth factor in addition to the forecast traffic generated by the related projects allows for a conservative forecast by overstating potential future traffic volumes. Furthermore, as described in Section 6.0 of the Traffic Study, CEQA only requires that one of these two approaches be employed in developing future traffic volume forecasts.

(ii) Related Projects

A forecast of on-street traffic conditions prior to occupancy of the Project was prepared by incorporating the potential trips associated with other known development projects (related projects) located within an approximate 1.5-mile radius of the Project Site. With this information, the Project's potential impact can be evaluated within the context of the cumulative impacts of all ongoing development. The related projects research was based on information on file with both LADOT and the Department of City Planning. More specifically, a list of related projects was obtained from LADOT covering the 1.5-mile radius area. With respect to City Planning, the research included, but was not limited to, a review

of proposed development projects within the Central City and Central City North Community Plan areas, proposed development projects within an approximate 1.5-mile radius of the Project Site for which EIRs are being or have been prepared (as shown on the Major Projects section of City Planning's website), and bi-weekly case filing reports. In addition, related projects lists from recently approved Memorandums of Understanding (MOU) and traffic studies in the vicinity were reviewed. The location of the related projects are shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR.

As discussed previously, due to extensive on-going construction activities affecting roadways and intersections in the immediate project vicinity, it was determined in consultation with LADOT that use of historical count data would be necessary for some of the study intersections included as part of the traffic study. As a result, the related projects list includes certain projects that are now complete. These built projects remain on the related projects list since they were not operational at the time some of the older traffic counts were conducted. In other words, because these now built related projects were not completed or fully occupied at the time the older traffic count data was obtained, the corresponding peak-hour vehicle trip generation was not accounted for in those past counts. As such, to be conservative and ensure a more accurate accounting of traffic conditions, these projects have been included as part of the related projects list evaluated herein.

Trip Generation and Distribution

Traffic volumes expected to be generated by the related projects were calculated using rates provided in the Institute of Transportation Engineers' (ITE) Trip Generation Manual, or they were obtained from other traffic studies and/or lists of related projects recently approved by the City. The related projects' respective traffic generation for the weekday A.M. and P.M. peak hours, as well as on a daily basis for a typical weekday, is summarized in Table 6-1 of the Traffic Study included as Appendix L.1 of this Draft EIR. The related projects' traffic volumes were distributed and assigned to the street system based on the projects' locations in relation to the study intersections, their proximity to major traffic corridors, proposed land uses, nearby population and employment centers, etc. The distribution of the related projects' traffic volumes to the study intersections during the weekday A.M. and P.M. peak hours are displayed in Figures 6-2 and 6-3 of the Traffic Study, respectively.

(b) Downtown Transit/Infrastructure Projects

Several transit and/or infrastructure projects are proposed or under construction within the greater Downtown area. While the projects discussed below and others like them could be expected to result in greater trip reductions than what occur today, no trip reductions have been assumed in this traffic analysis for existing uses so as to provide a

conservative review of potential traffic impacts. Some of the relevant projects include the following:

Regional Connector Transit Project—The Regional Connector project will extend from Metro's Little Tokyo/Arts District Station to the 7th Street/Metro Center in Downtown. This will allow transit passengers to access the Gold, Blue, Expo, Red, and Purple lines. The addition will extend 1.9 miles and serve Little Tokyo, the Arts District, Civic Center (i.e., at the Project Site), the Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street, as well as the Financial District. This new extension will provide a one-seat ride for travel across Los Angeles County by allowing passengers to travel between Azusa and Long Beach and between East Los Angeles and Santa Monica without having to transfer lines. The forecast opening year of the Regional Connector Transit project is currently 2021.

Downtown Los Angeles Historic Streetcar Project—The restoration of the Historic Streetcar Service in Downtown is expected to revive a service that previously spanned over 600 miles of the Los Angeles area during the first half of the 1900s. The approved alignments closely follow the early alignments that traversed the historic Downtown core. The service would increase mobility and improve connectivity by linking residential and employment hubs, shopping districts, civic resources, cultural institutions, landmarks, and entertainment venues for those who live, work, and visit Downtown. The Historic Streetcar project is also intended to connect patrons to a regional network of transit options including local and regional bus lines, and Metro rail lines including the Regional Connector Transit project. The Historic Streetcar has obtained operational funding for 30 years, but still needs capital funding for construction. Currently, the Historic Streetcar is anticipated to be complete and operational in July 2021.[16,17]

The Figueroa Streetscape (My Figueroa) Project—The overarching goal of this project is to provide enhancements to street trees, street lighting, street furniture and signage; provide more restricted parking and loading areas; incorporate transit platforms primarily along both sides of Figueroa Street (from 7th Street to Martin Luther King Jr. Boulevard) to the extent possible; implement sidewalk extensions to minimize pedestrian crossings times; and introduce protected bike lanes or bicycle tracks to encourage bicycling as a viable transportation mode and alternative to the use of single occupancy automobiles. Improvements also are proposed along 11th Street (from Figueroa Street to Broadway) and Martin Luther King Jr. Boulevard (from Figueroa Street to Vermont Avenue)

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[16] *Los Angeles Streetcar, "Project Info, Funding," http://streetcar.la/project-info/funding/, accessed February 15, 2018.*

[17] *Los Angeles City Council Transportation Committee Report, City Council File 11-0329-S12, approved by City Council on July 3, 2017.*

to enhance pedestrian and bicycle linkages in Downtown Los Angeles. The My Figueroa project is currently under construction and is expected to be completed in 2019.

(2) Future Without Project Conditions Intersection Levels of Service

Table IV.J-4 on page IV.J-29 summarizes the weekday A.M. and P.M. peak-hour V/C ratio for each of the 32 study intersections and the corresponding LOS for each intersection under Future Without Project conditions. As shown in Table IV.J-4, 23 of the 32 study intersections are projected to operate at LOS D or better during both the weekday A.M. and P.M. peak hours. The remaining nine study intersections are anticipated to operate at LOS E or F during at least one of the analyzed peak hours in the Future Without Project conditions:

- Intersection No. 4: Beaudry Avenue & 1st Street (P.M.)
- Intersection No. 5: Beaudry Avenue & 2nd Street (P.M.)
- Intersection No. 8: Figueroa Street & 2nd Street (A.M./P.M.)
- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps (P.M.)
- Intersection No. 10: Figueroa Street & 5th Street/SR-110 On-Ramps (P.M.)
- Intersection No. 11: Figueroa Street & 6th Street/SR-110 Off-Ramps (P.M.)
- Intersection No. 28: Main Street & 3rd Street (P.M.)
- Intersection No. 29: Main Street & 4th Street (P.M.)
- Intersection No. 31: Alameda Street & Arcadia Street/US-101 NB Off-Ramp (A.M./P.M.)

Table IV.J-4
Intersection Levels of Service—Future Without Project Conditions (2025)

No.	Intersection	A.M. Peak		P.M. Peak	
		V/C	LOS	V/C	LOS
1	Belmont Ave./Loma Dr. & Beverly Blvd.	0.516	A	0.475	A
2	Glendale Blvd. & Court St./Laveta Terrace	0.583	A	0.507	A
3	Glendale Blvd./Lucas Ave. & Beverly Blvd./1st St./ 2nd St.	0.881	D	0.720	C
4	Beaudry Ave. & 1st St.	0.562	A	**1.009**	**F**
5	Beaudry Ave. & 2nd St.	0.788	C	**1.101**	**F**
6	Beaudry Ave. & SR-110 SB Off-Ramp	0.563	A	0.640	B
7	Beaudry Ave. & 3rd St./Miramar St.	0.864	D	0.765	C
8	Figueroa St. & 2nd St.	**1.091**	**F**	**1.408**	**F**
9	Figueroa St. & 3rd St./SR-110 Ramps	0.893	D	**1.449**	**F**
10	Figueroa St. & SR-110 On-Ramps/5th St.	0.798	C	**1.136**	**F**
11	Figueroa St. & SR-110 Off-Ramps/6th St.	0.889	D	**0.903**	**E**
12	Hill St. & 2nd St.	0.749	C	0.807	D
13	Broadway & US-101 SB Off-Ramp/Aliso St.	0.452	A	0.547	A
14	Broadway & Temple St.	0.698	B	0.762	C
15	Broadway & 1st St.	0.666	B	0.744	C
16	Broadway & 2nd St.	0.607	B	0.610	B
17	Broadway & 3rd St.	0.701	C	0.739	C
18	Broadway & 4th St.	0.530	A	0.694	B
19	Spring St. & US-101 NB Off-Ramp	0.529	A	0.439	A
20	Spring St. & Aliso St.	0.495	A	0.265	A
21	Spring St. & Temple St.	0.744	C	0.520	A
22	Spring St. & 1st St.	0.519	A	0.443	A
23	Spring St. & 2nd St.	0.633	B	0.602	B
24	Spring St. & 3rd St.	0.774	C	0.671	B
25	Spring St. & 4th St.	0.593	A	0.739	C
26	Main St. & 1st St.	0.432	A	0.664	B
27	Main St. & 2nd St.	0.501	A	0.805	D
28	Main St. & 3rd St.	0.829	D	**1.053**	**F**
29	Main St. & 4th St.	0.413	A	**0.991**	**E**
30	Los Angeles St. & Aliso St./US-101 SB On-Ramp	0.289	A	0.812	D
31	Alameda St. & Arcadia St./US-101 NB Off-Ramp	**0.929**	**E**	**0.941**	**E**
32	US-101 SB Ramps/Garey St. & Commercial St.	0.528	A	0.760	C

Source: Linscott, Law & Greenspan., 2018.

3. Project Impacts

a. Methodology

The methodology and base assumptions used in this analysis were established by LADOT, and, where LADOT does not prescribe a specific methodology, the *L.A. CEQA Thresholds Guide* was used. This analysis addresses a wide range of issues, including, but not limited to, the following:

- Construction: an analysis of the potential temporary impacts on traffic, access, transit, and parking resulting from the Project's construction activities;[18]
- Intersections: an analysis of the potential changes in operating conditions at the 32 study intersections identified within the study area;
- Regional transportation system: an analysis of potential impacts on the capacity of transit lines serving the Project Site and along the nearest CMP arterial monitoring stations and mainline freeway monitoring location; and
- Project access: an analysis of potential impacts associated with access to and from the Project Site by automobiles, bicyclists, and pedestrians.

(1) Construction Impacts

The *L.A. CEQA Thresholds Guide* identifies several types of in-street construction impacts and a number of factors for determining the significance of a project's construction-related traffic impacts. Each of the four types of construction impacts refers to a particular population that could be inconvenienced by construction activities. The four types of impacts and related populations are:

- Temporary traffic impacts: potential impacts on vehicular travelers on roadways;
- Temporary loss of access: potential impacts on visitors entering and leaving sites;
- Temporary loss of bus stops or rerouting of bus lines: potential impacts on transit riders, and

[18] *However, as previously discussed, per SB 743 and PRC Section 21099, parking impacts of a mixed-use residential project on an infill site within a transit priority area shall not be considered significant impacts on the environment.*

- Temporary loss of on-street parking: potential impacts on parkers.[19]

The construction traffic analysis is based, in part, on an estimate of construction-related trips (i.e., construction worker trips and construction truck trips) that would occur as a result of the Project. The factors used to determine the significance of a project's impacts also involve the potential inconvenience caused to a population and consideration for public safety. Traffic impacts resulting from construction activities could occur as a result of the following types of activities:

- Increases in truck traffic associated with export or import of fill materials and delivery of construction materials.
- Increases in automobile traffic associated with construction workers traveling to and from the Project Site.
- Reductions in existing street capacity or on-street parking from temporary lane closures necessary for the construction of roadway improvements, utility relocation, and drainage facilities.
- Blocking existing vehicle or pedestrian access to other parcels fronting adjacent streets.

It is noted that construction traffic analyses need not be quantitative in nature; a qualitative analysis may be appropriate and sufficient.[20]

(2) Operational Impacts

The relative impact of the traffic volumes that would be generated by the Project was evaluated based on analysis of operating conditions at the study intersections, both with and without the Project. As required by CEQA and LADOT's *Transportation Impact Study Guidelines*, the Project's impacts were evaluated against Existing (2017) and Future (2025) traffic conditions. The following discussion describes the components of the Project's operational traffic impact analysis.

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[19] *However, as previously discussed, per SB 743 and PRC Section 21099, parking impacts of a mixed-use residential project on an infill site within a transit priority area shall not be considered significant impacts on the environment.*

[20] *In fact, new CEQA Guidelines Section 15064.3(b)(3), which helps implement SB 743, states that "[f]or many projects, a qualitative analysis of construction traffic may be appropriate."*

(a) Level of Service Methodology

As required by LADOT, the existing and future traffic volumes at the study intersections were evaluated using the CMA methodology, which, as discussed above, determines V/C ratios on a critical movement basis. The overall intersection V/C ratio is subsequently assigned an LOS value to describe intersection operations. Table IV.J-2 on page IV.J-23 defines the ranges of V/C ratios and their corresponding LOS value. LOS definitions for signalized intersections range from excellent, nearly free-flow traffic at LOS A to stop-and-go conditions at LOS F.

(i) Project Trip Generation

The number of trips expected to be generated by the Project were estimated using rates published in the Institute of Transportation Engineers' *Trip Generation, 9th Edition*. These rates are based on surveys of similar land uses at sites around the country and are provided as both daily rates and A.M. and P.M. peak-hour rates. The number of vehicle trips traveling to and from the Project Site is directly related to the types of proposed land uses and associated floor areas.

As described in Section II, Project Description, of this Draft EIR, the Project includes the development of a 30-story mixed-use building consisting of 107 residential units (comprising an estimated 137,347 square feet), 7,200 square feet of ground level commercial retail uses, and 534,044 square feet of office uses. Based on these proposed uses, trip generation rates for apartment, shopping center, and general office building uses were used to forecast the traffic volumes generated by the Project. While the Project's residential component may ultimately consist of condominium or apartment units, the ITE trip rates for the apartment land use category were used since apartments generally generate greater traffic volumes than condominiums. This results in a more conservative assessment of potential Project-related traffic impacts.

Based on consultation with LADOT staff and a review of relevant Transportation Research Board and Caltrans reports, which are discussed in detail in Section 7.1 of the Traffic Study, conservative adjustments were made to the Project trip generation forecasts to account for transit usage, bicycle usage, walking, and internal capture. A separate walk/bike adjustment conservatively was not applied to the retail component since the adjustment would have resulted in only a nominal trip reduction during the A.M. and P.M. peak hours due to the small size of the planned retail component. LADOT has approved incorporation of the following trip generation adjustments and determined that they are consistent with the City's transportation impact study guidelines:

- 25 percent transit adjustment applied to the office, residential, and commercial retail components;

- 5 percent walk/bike adjustment applied to the office and residential components; and

- 5 percent internal capture adjustment applied to the residential component and 20 percent internal capture adjustment applied to the commercial retail component.

The Project's resulting trip generation estimates are summarized in Table IV.J-5 on page IV.J-34. As shown therein, after accounting for the adjustments listed above, the Project is anticipated to generate 4,006 new weekday trips, including 560 A.M. peak-hour trips (467 inbound trips, 93 outbound trips) and 541 P.M. peak-hour trips (118 inbound trips, 423 outbound trips).

(ii) Project Trip Distribution and Assignment

The geographic distribution of Project trips is based on a number of factors, including the location of residential and employment centers from which patrons of the Project would be drawn, characteristics of the street system serving the Project, existing intersection traffic volumes, the Project ingress/egress availability based on the proposed site access and circulation plan, and input from LADOT staff. The projected trip distribution for the Project is shown in Figure 7-1 of the Traffic Study. This trip distribution is based on the following considerations:

- The Project Site's proximity to major traffic corridors (i.e., Hill Street, Broadway, Spring Street, Temple Street, 1st Street, 2nd Street, etc.);

- Expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals;

- Existing intersection traffic volumes;

- Ingress/egress scheme planned for the proposed project;

- Nearby population and employment centers; and

- Input from LADOT staff.

The Project's forecasted new weekday A.M. and P.M. peak-hour traffic volumes at the study intersections are illustrated in Figures 7-2 and 7-3, respectively, of the Traffic Study.

Table IV.J-5
Project Trip Generation Estimates—Proposed Uses

ITE Code[a]	Project Trip Description	Size	Daily Traffic	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
710	**Office**	534,044 sf	4,690	643	88	731	115	562	677
	Less Transit/HOV (25%)		(1,172)	(161)	(22)	(183)	(29)	(141)	(170)
	Less Walk/Bike (5%)		(176)	(24)	(3)	(27)	(4)	(21)	(25)
	Subtotal		*3,342*	*458*	*63*	*521*	*82*	*400*	*482*
220	**Apartment**	107 du	712	11	44	55	43	23	66
	Less Internal Capture (5%)		(36)	(1)	(2)	(3)	(2)	(1)	(3)
	Less Transit/HOV (25%)		(170)	(3)	(11)	(14)	(10)	(6)	(16)
	Less Walk/Bike (5%)		(26)	0	(2)	(2)	(2)	(1)	(3)
	Subtotal		*480*	*7*	*29*	*36*	*29*	*15*	*44*
820	**Retail**	7,200 sf	308	4	3	7	13	14	27
	Less Internal Capture (20%)		(62)	(1)	(1)	(2)	(3)	(3)	(6)
	Less Transit/HOV (25%)		(62)	(1)	(1)	(2)	(3)	(3)	(6)
	Subtotal		*184*	*2*	*1*	*3*	*7*	*8*	*15*
Total New Project Trips			**4,006**	**467**	**93**	**560**	**118**	**423**	**541**

sf = square feet

du = dwelling units

[a] *Trip generation rates according to Institute of Transportation Engineers, Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington DC, 2012.*

Source: Linscott, Law & Greenspan, 2018.

(b) Regional Transportation System/Congestion Management Program

(i) Congestion Management Program Roadway Network

The Project's potential impacts on CMP monitoring stations and freeways were analyzed in accordance with the CMP TIA guidelines. In order to address the potential for regional traffic impacts, the number of net new peak-hour Project trips was added to the CMP monitoring locations and freeways in the Project vicinity to determine whether these volumes exceed the CMP thresholds of 150 vehicles per hour for freeway segments or 50 vehicle trips per hour for arterial monitoring stations. If the Project traffic volumes are not found to exceed the CMP screening thresholds, no further analysis is required.

(ii) Transit System

Section B.8.4 of the CMP provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the number of vehicle trips. While the CMP sets forth a methodology for calculating transit trips (i.e., person trips equal 1.4 times vehicle trips and up to 15 percent of person trips can be assumed to be transit trips for projects within 0.25 mile of a transit center), the unadjusted project trip

generation shown in Table 7-1 of the Traffic Study was adjusted further to account for the fact that the Project would be located directly above the planned Regional Connector 2nd Street/Broadway rail station. Therefore, consistent with LADOT transportation impact study guidelines, transit trips were assumed to equal 25 percent of total person trips versus 15 percent as set forth in the CMP.

(iii) Caltrans Facilities Analysis

In addition to the intersection analysis based on the City's methodology, a supplemental analysis was prepared based on the Highway Capacity Manual (HCM) operational analysis methodologies. Details of this analysis are included in Appendix D of the Traffic Study for informational purposes.

(c) Access and Circulation

The analysis of the Project's potential access impacts included a review of the proposed vehicular access points and internal circulation. A determination was made pursuant to the thresholds of significance identified below regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

(d) Bicycle, Pedestrian, and Vehicular Safety

The methodology for the analysis of pedestrian/bicycle safety impacts includes a review of the Project's access and internal circulation scheme and a determination of whether the Project would substantially increase the potential for pedestrian/vehicle and/or bicycle/vehicle conflicts pursuant to the thresholds of significance identified below.

(3) Amendments to the CEQA Guidelines and Proposed Transportation Assessment Guidelines

As previously discussed, after undergoing a rulemaking process, amendments to the CEQA Guidelines, including new Section 15064.3, were finalized by the Resources Agency in November 2018 and approval is expected to be imminent. In response to the new CEQA Guidelines and to implement SB 743, LADOT and the Department of City Planning have worked collaboratively to develop a proposed methodology to assess projects' transportation impacts based on VMT. To that end, new Transportation Assessment Guidelines that provide direction on how to analyze transportation impacts using VMT are expected to be released by LADOT in early 2019. In addition, as discussed further below, new significance thresholds have been proposed by the Department of City Planning, which reflect the guidance provided in new CEQA Guidelines Section 15064.3.

b. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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

Threshold (a): ***Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;***

Threshold (b): ***Conflict with an applicable congestion management program including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;***

Threshold (c): ***Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;***

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

Threshold (e): ***Result in inadequate emergency access; or***

Threshold (f): ***Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.***

(2) L.A. CEQA Thresholds Guide

The *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate transportation and traffic impacts:

(a) Intersection Capacity

- Whether the project traffic causes an increase in the V/C ratio on the intersection operating condition after the addition of project traffic of one of the following:

- equal to or greater than 0.04 if final LOS is C,
- equal to or greater than 0.02 if final LOS is D, or
- equal to or greater than 0.01 if final LOS is E or F.

(b) Freeway Capacity

- Whether the project traffic causes an increase in the demand-to-capacity (D/C) ratio on a freeway segment or freeway on- or off-ramp of two percent or more capacity (D/C increase > 0.02), which causes or worsens LOS F conditions (D/C > 1.00).

(c) Project Access (Operational)

- Whether the project traffic results in the intersection(s) nearest the primary site access to operate at LOS E or LOS F during the A.M. or P.M. peak hours, under cumulative plus project conditions.

(d) Bicycle, Pedestrian, and Vehicular Safety

- The determination of significance shall be on a case-by-case basis, considering the following factors:
  - The amount of pedestrian activity at project access points;
  - Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists;
  - The type of bicycle facility the project driveway(s) crosses and the level of utilization; and
  - The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.

(e) Transit System Capacity

- The projected number of additional transit passengers expected with the implementation of the proposed project and available transit capacity.

(f) In-Street Construction

- The determination of significance shall be made on a case-by-case basis, considering the following factors:

- Temporary Traffic Impacts
  - The length of time of temporary street closures or closures of two or more traffic lanes;
  - The classification of the street (major arterial, state highway) affected;
  - The existing traffic levels and LOS on the affected street segments and intersections;
  - Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;
  - Potential safety issues involved with street or lane closures; and
  - The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.
- Temporary Loss of Access
  - The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;
  - The availability of alternative vehicular or pedestrian access within 0.25 mile of the lost access; and
  - The type of land uses affected, and related safety, convenience, and/or economic issues.
- Temporary Loss of Bus Stops or Rerouting of Bus Lines
  - The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
  - The availability of a nearby location (within 0.25 mile) to which the bus stop or route can be temporarily relocated;
  - The existence of other bus stops or routes with similar routes/destinations within a 0.25 mile radius of the affected stops or routes; and
  - Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).
- Temporary Loss of On-Street Parking
  - The current utilization of existing on-street parking;

- The availability of alternative parking locations or public transit options (e.g., bus, train) within 0.25 mile of the Project Site; and
- The length of time that existing parking spaces would be unavailable.

In assessing impacts related to transportation and traffic in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

(3) Amendments to the CEQA Guidelines and Proposed Thresholds of Significance

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 transit priority areas. 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) states "a project's effect on automobile delay does not constitute a significant environmental impact."

In addition, new CEQA Guidelines Section 15064.3(c) indicates the provisions of Section 15064.3 shall apply statewide beginning on January 1, 2020 but that a lead agency may elect to be governed by its provisions immediately upon adoption. Accordingly, the City has proposed, but not yet adopted, new thresholds of significance that include a threshold addressing consistency with new CEQA Guidelines Section 15064.3(b), which sets forth new criteria for analyzing transportation impacts. The proposed new thresholds are expected to be adopted by the City in 2019.

c. Analysis of Project Impacts

(1) Project Design Features

The Project would implement the following project design feature, which is relevant to the assessment of construction traffic impacts and impacts related to bicycle, pedestrian, and vehicular safety:

TR-PDF-1: Prior to the start of construction, the Project Applicant shall prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan

shall formalize how construction will be carried out and identify specific actions required to reduce effects on the surrounding community. The Construction Traffic Management Plan shall be based on the nature and timing of the specific construction activities for the Project and shall consider other projects under construction in the immediate vicinity of the Project Site. Accordingly, the Construction Traffic Management Plan shall include, but not be limited to, the following features, as appropriate:

- Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on- and off-site locations;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring properties;
- Coordinate with public transit agencies to provide advanced notifications of any temporary transit stop relocations and durations and follow all safety required procedures required by the concerned agency;
- Limit any potential roadway lane closure(s) to off-peak travel periods, to the extent feasible;
- Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation;
- To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Identify the routes that construction vehicles will utilize for the delivery of construction materials (i.e. lumber, tiles, piping, windows, etc.), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project;
- Require the Applicant to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of construction activities;

- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by Caltrans or LADOT;
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed;
- Haul trucks entering or exiting public streets shall at all times yield to public traffic;
- Construction-related parking and staging of vehicles shall occur on-site to the extent possible, but may occur on nearby public parking lots, as approved by the City;
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times;
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site; and
- The Construction Traffic Management Plan shall meet standards established in the current California Manual on Uniform Traffic Control Device (MUTCD) as well as City of Los Angeles requirements.

TR-PDF-2: The Project Applicant shall prepare and implement a Transportation Demand Management (TDM) Program to reduce peak-hour vehicular traffic to and from the Project Site. A formal Preliminary TDM Plan shall be developed in conjunction with LADOT and shall be required prior to issuance of a building permit for the Project. This preliminary plan shall include, at a minimum, measures consistent with the City's Trip Reduction Ordinance. A Final TDM Plan shall be required prior to issuance of any Certificate of Occupancy. A Covenant and Agreement shall be enacted to ensure the TDM plan is maintained. The TDM plan may include, but shall not be limited to, the following measures:

- On-Site Employee Transportation Coordinator—An on-site Employee Transportation Coordinator (ETC) may be designated for the Project. The ETC would manage all aspects of an enhanced TDM program and also would participate in City-sponsored workshops and information roundtables. The ETC would establish a Transportation Information Center and Transportation Fairs. The Transportation Information Center would provide on-site information at its buildings for employees and visitors about local public transit services (including bus lines, rail lines and connections, rideshare programs and shuttles), and

bicycle facilities (including routes, rental and sales locations, on-site bicycle racks and showers). Walking and biking maps also would be provided for employees, visitors and residents, which would include but not be limited to information about convenient local services and restaurants within walking distance of the Project. Such transportation information may be provided through a computer terminal with access to the Internet, as well as through the office of the ETC located at the Project Site. Transportation information should be maintained at the administrative offices of the building, or by directing inquiries to the building's web site as a portal;

- TDM Website Information—Transportation information should be provided in a highly visible and accessible location on the building's web site, including links to local transit providers, area walking, bicycling maps, etc., to inform employees, visitors, and residents of available alternative transportation modes to access the Project Site, other amenities in the area, and travel opportunities in the area. The website also should highlight the environmental benefits of utilization of alternative transportation modes;
- TDM Promotional Material—Provide and exhibit in public places information materials on options for alternative transportation modes and opportunities. In addition, transit fare media and day/month passes should be made available to employees and visitors during typical business hours;
- Transit Welcome Package—All new employees could be provided with a Transit Welcome Package (TWP) in addition to holding a Transportation Fair on an annual basis. The TWP at a minimum could include information regarding each employer's arrangements for free or discounted use of the transit system, area bus/rail transit route and connections/transfers information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the Project;
- Carpool Program for Employees—Provide preferential parking within the on-site parking garage for employees who commute to work in registered carpools. An employee who drives to work with at least one other employee to the site may register as a carpool entitled to preferential parking within the meaning of this provision;
- Guaranteed Ride Home Program for Employees—Provide employees who carpool/rideshare with a reimbursed ride home in the event of a valid emergency.

- Public Transit Stop Enhancements—Work in cooperation with LADOT and other transit agencies to improve existing bus stops with enhanced shelters and transit information within the immediate vicinity of the building. Enhancements could include enhanced weather/sun protection, lighting, benches, and trash receptacles. These improvements would be intended to make riding the bus a safer and more attractive alternative. In addition, coordination with the City's Bureau of Engineering is recommended in regards to the corresponding streetscape elements/design in association with the Broadway Streetscape Master Plan project and the Downtown Los Angeles Historic Streetcar project;
- Convenient Parking/Amenities for Bicycle Riders—Consistent with LAMC requirements, provide locations at the Project Site for convenient bicycle parking for employees, residents, and visitors. Bicycle parking shall be located outside and adjacent to the building as well as within the on-site parking structure such that long-term and short-term parkers can be accommodated. Bicycle parking may include bicycle racks, locked cages, or another similar parking area. Provide shower facilities for employees who commute to work via bicycle. In addition, Metro may provide additional bicycle parking within the Metro plaza;
- Local Hiring Program—To the extent feasible, when hiring conduct outreach to residents who live within Downtown Los Angeles based on satisfaction of other requirements of the available positions;
- Flexible/Alternative Work Schedules—Encourage tenants in the building to offer flexible or alternative work schedules, as well as the opportunity to telecommute if feasible; and
- Parking Cash-Out Program—Require in all leases it executes as landlord for space within the Project that tenants offer a parking cash-out program. Parking cash-out program refers to an employer-funded program under which an employer offers in-lieu of any parking subsidy, a transit subsidy or cash allowance (for use of alternative modes such as walking and bicycling) of equal or greater value.
- City of Los Angeles Bicycle Trust Fund Contribution—The Project Applicant shall make a one-time fixed-fee contribution of $50,000 to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the general Downtown Los Angeles area of the Project.
- LADOT Mobility Hub Program—The Project Applicant shall make a one-time fixed-fee contribution to LADOT to be used in the

implementation of the Mobility Hub in the general area of the Project.

(2) Relevant Project Characteristics

As discussed in detail in Section II, Project Description, of this Draft EIR, the Project involves the development of a 30-story mixed-use building consisting of 107 residential units (comprising an estimated 137,347 square feet), 7,200 square feet of ground level commercial retail uses, and 534,044 square feet of office uses in Downtown Los Angeles. As previously indicated, the Project Site is well served by transit, with six existing or proposed Metro stations located within 0.5-mile radius, and thus is located within a transit priority area.

The Project Site is the future site of the Metro Regional Connector 2nd Street/ Broadway rail station and portal. The 2nd Street/Broadway rail station will be below grade, with an at-grade station portal at the northwest corner of the site at 2nd Street and Broadway. The Metro station and portal constitute a separate Project but are currently under construction within the Project Site. The portal will include ticket booths, kiosks, information signs, stairs, escalators, and elevators to serve the subterranean Metro station. The Project's mixed-use building would be built above the Metro portal, and a plaza surrounding the portal would include planted areas, benches and café seating, and bicycle parking. The design of the plaza around the portal would be integrated with a paseo traversing the Project Site, thus creating a larger, public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street. This landscaped passage or paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street.

The existing parking structure located on the southern portion of the Project Site would remain and provide the required vehicular parking and long-term bicycle parking for the proposed uses. More specifically, the existing 1,460 parking spaces within the garage would be reconfigured to provide 1,436 vehicular spaces and 218 long-term bicycle parking spaces, plus 68 short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza. The Project would require 628 vehicular parking spaces per the LAMC, based on bicycle parking and transit credit deductions, as well as 0.25 space per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2. Accordingly, surplus parking would remain available for the nearby Los Angeles Times Square buildings located on the north

side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.[21]

Vehicular access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building. Pedestrian access to the on-site parking structure would be provided from the paseo, thus minimizing pedestrian conflicts at the driveways.

The Project does not include street dedications. However, the following sidewalk easements would be provided along Broadway, 2nd Street, and Spring Street in order to comply with the City's General Plan Mobility Plan 2035 standards for sidewalk widths:

- Broadway—A 17-foot sidewalk would be provided, consisting of a 12-foot sidewalk in the public right-of-way and a 5-foot sidewalk easement on private property.
- 2nd Street—A 15-foot sidewalk would be provided, consisting of an 8-foot sidewalk in the public right-of-way and a 7-foot sidewalk easement on private property. This may be subject to change pending Metro's final sidewalk widening plans in conjunction with the Regional Connector project on-site.
- Spring Street—A 14-foot sidewalk would be provided in the public right-of-way. Based on the Project's plans, there would also be an additional 5 feet of paving on private property between the building and the back of the 14-foot sidewalk. Pursuant to Metro's current plans, Metro also may provide a 5-foot sidewalk easement in this paved area, which could result in a 19-foot sidewalk area along Spring Street adjacent to the Project's new building. In addition, there would be an variable width sidewalk easement of up to 8.5 feet on private property (including an area that is currently public right-of-way but that would be merged into the tract as part of the subdivision process) for the portion of Spring Street where the Project's curbside drop-off-area would be located. The term "variable width" is used to describe the transition area for entering and exiting the widened drop-off area.

[21] *Off-site parking covenants per County of Los Angeles Recorder Instrument Nos. 90-2043634, 97-1672752, 98-854779, and 05-1924091. Accordingly, under the covenants a total of 69 parking spaces (67 regular spaces and 2 handicap spaces) would be set aside.*

(3) Project Impacts

Threshold (a): Would the Project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

(a) Construction Impacts

Potential traffic impacts from Project construction activities could occur as a result of the following types of activities:

- Increases in truck traffic associated with export or import of fill materials and delivery of construction materials;
- Increases in automobile traffic associated with construction workers traveling to and from the Project Site;
- Reductions in existing street capacity from temporary lane closures necessary for the construction of roadway/access improvements, utility connections, and drainage facilities; and
- Blocking existing vehicle or pedestrian access to other parcels fronting streets.

The following discussion addresses each of these potential impacts based on the Project's construction characteristics.

(i) Construction Assumptions

Construction of the Project is anticipated to begin in 2022 and be complete by 2025. Project construction is expected to occur in one primary phase, with no overlap with construction of the Metro portal and station on-site. As previously discussed, the on-site portal and station are currently under construction, and the Metro Regional Connector line is forecasted to open in 2021. Construction activities would occur in accordance with LAMC requirements, which prohibit construction before 7:00 A.M. and after 9:00 P.M. Monday through Friday, before 8:00 A.M. and after 6:00 P.M. on Saturday, and at any time on Sunday.

More specifically, Project construction is anticipated to last approximately 39 months and consist of demolition, grading, foundation, building construction, paving, and landscaping phases. It is assumed that the demolition and site preparation would occur on

the Project Site during the first two weeks following commencement of construction activities and would require 15 workers and up to 15 trucks daily. Peak grading and associated excavation activities would occur during the following month and would require 30 workers. It is anticipated that site excavation and grading would require the removal of approximately 7,000 cubic yards of material from the Project Site, which is estimated to equal approximately 500 truckloads based on 14 cubic yards per truck. The export period is assumed to include 21 non-holiday workdays, which corresponds to 24 truckloads per day. However, during peak grading activities, up to 50 truckloads per day may be expected. Following the completion of site grading, construction of the building foundation is expected to occur over approximately 4.5 months, requiring 50 workers and up to 50 trucks daily. Building construction would occur during the following 32 months, requiring 250 workers and up to 50 trucks per day. Landscaping and paving would occur during the final month of construction, requiring 50 workers and up to 20 trucks per day.

It is assumed that the equipment staging area during the initial phases of construction would occur on, within, and adjacent to the Project Site construction area (i.e., the northern portion of the Project Site). Construction worker parking also could occur within this area during certain times, however during building construction (i.e., building erection), workers would likely park within the parking garage on-site (i.e., the southern portion of the Project Site). It is assumed that workers would generally arrive at the site by 7 A.M. and depart the site by 3:30 P.M. (i.e., after an eight hour workday including a lunch break), except when overtime is necessary to maintain the schedule. While it is not known at this time if temporary lane closures will be necessary during construction, any such closures would be expected to occur outside the weekday A.M. and P.M. peak hours so as to maintain roadway capacity when the street system is typically most heavily constrained.

The Project's haul routes would be subject to approval by the City as part of its consideration of the vesting tentative tract map. It is anticipated that demolition materials, soil export, and construction debris would be transported to Chiquita Canyon Landfill in Castaic and/or Manning Pit in Irwindale. The haul route to/from Chiquita Canyon Landfill is anticipated to follow segments of 2nd Street, Spring Street, 3rd Street, and Aliso Street in Downtown Los Angeles; CA-110, US-101, CA 170, and I-5; as well as Newhall Ranch Road, SR-126, and Henry Mayo Drive in Castaic. Alternatively, the haul route to/from Manning Pit would follow segments of 2nd Street, Spring Street, 4th Street, Los Angeles Street, El Monte Busway East, and Arcadia Street in Downtown; US-101 and I-10; and Vincent Drive in Irwindale.

Based on a review of the construction phasing, the overall highest construction traffic generation is expected to occur during building construction activities. Other phases such as demolition, grading, foundation construction, and landscaping are expected to be less intensive in terms of overall construction traffic generation. In addition, with

implementation of a Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-1, it is anticipated that the vast majority, if not all, haul truck activity to and from the Project Site would occur outside of the A.M. and P.M. peak hours. The peak construction traffic trip generation and corresponding impact assessment (during building construction activities) is described in more detail below.

(ii) Construction Traffic

Construction Trip Generation

As described above, peak construction traffic generation would occur during the building construction phase. This peak construction activity is expected to occur over a 32-month period. During this phase a maximum of 250 construction workers is expected. As noted above, construction workers are expected to arrive to the Project Site prior to 7:00 A.M. Therefore, it is assumed that these trips would occur outside of the weekday A.M. peak hour. Assuming the typical eight-hour work day ends at 3:30 P.M., 50 percent of the workers are assumed to leave the site between 3:30 and 4:00 P.M., 25 percent between 4:00 and 4:30 P.M., and the remaining 25 percent (including supervisors) after 4:30 P.M. Although construction worker trips would generally occur outside of the afternoon commuter peak hours, 25 percent of the construction work force (63 workers) has been assumed to overlap with the weekday P.M. peak hour, which generally occurs between 5:00 and 6:00 P.M., in order to provide a conservative analysis of construction traffic impacts.

It is anticipated that construction workers generally would remain on-site throughout the day. The number of construction worker vehicles was estimated based on an average vehicle ridership (AVR) of 1.135 persons per vehicle, as provided in the South Coast Air Quality Management District CEQA Air Quality Handbook. Therefore, it is estimated that approximately 442 daily vehicle trips (221 inbound trips and 221 outbound trips) would be generated to/from the Project Site by construction workers during the peak building construction phase. With 25 percent of these workers conservatively assumed to overlap with the weekday P.M. peak hour, this would result in 55 outbound construction worker vehicle trips during the weekday P.M. peak hour.

In addition to construction worker vehicles, additional trips may be generated by various types of trucks traveling to and from the Project Site. These trucks may deliver equipment and/or construction materials, and smaller pick-up trucks or four-wheel drive vehicles may used by construction supervisors and/or City inspectors to travel to and from the site. During the peak building construction phase, it is estimated that up to 50 trucks per day would travel to and from the Project Site, resulting in 100 truck trip ends (i.e., 50 inbound truck trips and 50 outbound truck trips). To conservatively estimate the equivalent number of passenger vehicles associated with the trucks, a passenger car

equivalent (PCE) factor of 2.5 was utilized based on standard traffic engineering practice.[22] Therefore, based on 50 trucks per day, it is estimated that construction activity would generate approximately 250 daily PCE vehicle trip ends (i.e., 125 inbound trips and 125 outbound trips). Assuming that miscellaneous truck trips such as equipment and material deliveries may occur between 7:00 A.M. and 6:00 P.M., it is estimated that an average of approximately 22 PCE vehicle trips (i.e., 11 inbound trips and 11 outbound trips) would occur per hour, including during the A.M. and P.M. peak hours.

The trip generation forecast during the peak phase of building construction is presented in Table E-1 in Appendix E of the Traffic Study. Taken together, the construction worker vehicles and construction trucks during building construction are forecast to generate up to 22 weekday A.M. peak-hour vehicle trips (i.e., 11 inbound trips and 11 outbound trips), and up to 77 weekday P.M. peak-hour vehicle trips (i.e., 11 inbound trips and 66 outbound trips). Evaluation of such trips during peak hours supports a conservative analysis since, as previously indicated, construction workers would generally arrive to the site by 7:00 A.M. and depart the site by 3:30 P.M. and most if not all haul truck activity to and from the Project Site would occur outside of peak hours based on implementation of Project Design Feature TR-PDF-1.

Construction Traffic Impacts

As discussed further below, Project operation is expected to result in significant traffic impacts at four study intersections. Accordingly, the construction traffic impact analysis focuses on those four study intersections to determine if the Project would result in significant traffic impacts during the peak phase of building construction.[23] The results of this analysis, provided in Table IV.J-6 on page IV.J-50, show that Project construction traffic would not result in any significant traffic impacts at the study intersections during peak construction activities. Additionally, the Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-1 would further reduce the Project's less-than-significant construction impacts.

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[22] *Transportation Research Circular No. 212 (Transportation Research Board, 1980) defines PCE for a vehicle as the number of through moving passenger cars to which it is equivalent based on the vehicle's headway and delay-creating effects.*

[23] *In comparison to peak construction trip generation of 22 vehicle trips (11 inbound trips and 11 outbound trips) during the weekday A.M. peak hour and up to 77 vehicle trips (11 inbound trips and 66 outbound trips) during the weekday P.M. peak hour, upon completion the Project is expected to generate 560 vehicle trips (467 inbound trips and 93 outbound trips) during the weekday A.M. peak hour and 541 vehicle trips (118 inbound trips and 423 outbound trips) during the weekday P.M. peak hour. Accordingly, construction traffic can be expected to have fewer impacts than Project operations, and the construction analysis can be limited to those intersections where operations are projected to result in significant impacts.*

Table IV.J-6
Summary of Volume-to-Capacity Ratios and Levels of Service—Weekday A.M. and P.M. Peak Hours—Construction Analysis

No.	Intersection	Peak Hour	[1] Year 2017 Existing V/C	[1] LOS	[2] Year 2017 Existing With Project V/C	[2] LOS	[2] Change V/C [(2) − (1)]	[2] Signif. Impact?[a]	[3] Year 2025 Future Without Project V/C	[3] LOS	[4] Year 2025 Future With Project V/C	[4] LOS	[4] Change V/C [(4) − (3)]	[4] Signif. Impact?[a]
5	Beaudry Ave./2nd St.	A.M.	0.640	B	0.640	B	0.000	No	0.788	C	0.789	C	0.001	No
		P.M.	0.896	D	0.898	D	0.002	No	1.101	F	1.103	F	0.002	No
8	Figueroa St./2nd St.	A.M.	0.747	C	0.748	C	0.001	No	1.091	F	1.092	F	0.001	No
		P.M.	1.059	F	1.061	F	0.002	No	1.408	F	1.409	F	0.001	No
9	Figueroa St./3rd St.—SR-110 Ramps	A.M.	0.789	C	0.789	C	0.000	No	0.893	D	0.893	D	0.000	No
		P.M.	1.131	F	1.133	F	0.002	No	1.449	F	1.452	F	0.003	No
31	Alameda St./Arcadia St.—US-101 NB Off-Ramp	A.M.	0.530	A	0.531	A	0.001	No	0.929	E	0.929	F	0.000	No
		P.M.	0.630	B	0.631	B	0.001	No	0.941	E	0.941	E	0.000	No

[a] *LADOT's "Transportation Impact Study Guidelines," December 2016, a transportation impact on an intersection shall be deemed significant in accordance with the following table:*

Final V/C	*LOS*	*Project Related Increase in V/C*
>0.701–0.800	*C*	*equal to or greater than 0.040*
>0.801–0.900	*D*	*equal to or greater than 0.020*
>0.901	*E/F*	*equal to or greater than 0.010*

Source: Linscott, Law & Greenspan, 2018.

Due to the short-term nature of construction activities and the variable characteristics and needs of a specific project's construction phase(s), LADOT recommends that a construction work site traffic control plan be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of construction activity. The construction work site traffic control plan is required to identify the location of all temporary roadway lane and/or sidewalk closures needed during project construction. Any lane or sidewalk closures lasting 72 hours or longer also require a B-Permit from the City's Bureau of Street Services (BSS). Additionally, if pedestrian detours and/or temporary travel lane closures are proposed, LADOT requires submission and approval of a traffic control/management plan prior to the issuance of building permits.

As discussed above, implementation of TR-PDF-1 would require the Project Applicant to prepare a detailed Construction Traffic Management Plan, which would include street/lane closure information, a detour plan, haul route(s), and a staging plan. The plan would be based on the nature and timing of the Project's specific construction activities and would consider other projects under construction in the immediate vicinity of the Project Site. As previously described, the Construction Traffic Management Plan also would include features such as notification to adjacent project owners and occupants of upcoming construction activities, coordination with City and emergency service provides to ensure adequate access is maintained to the Project Site and neighboring properties, advance notification regarding any temporary transit stop relocations, and limitation of any potential roadway lane closure(s) to off-peak travel periods, to the extent feasible.

As also set forth in the Construction Traffic Management Plan, if any sidewalk and/or lane closure is necessary, safety precautions for pedestrians and bicyclists would be implemented through such measures as alternate routing, protection barriers, and appropriate signage, which must be reviewed and approved by LADOT. In addition, bus stops along Project frontages would be maintained to the extent feasible or would be temporarily relocated, consistent with Metro bus operational needs. The Applicant also is obligated to ensure that access to the future Metro Regional Connector 2nd Street/ Broadway rail station is not interrupted during Project construction. It is further noted that Metro will provide bike parking within the portal plaza on-site, which will be available for use by cyclists using transit during and after Project construction. Therefore, impacts to access (including pedestrians/bicycles) and transit during Project construction would be less than significant.

Based on the analysis above, Project construction would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The Project's construction-related traffic

impacts with respect to roadway levels of service, access (including pedestrians/ bicycles), and transit would be less than significant.

(b) Operational Impacts

(i) Intersection Levels of Service

Existing With Project Conditions

The analysis of Existing With Project conditions evaluates potential Project-related traffic impacts as compared to existing conditions during the typical weekday A.M. and P.M. peak hours. Under this scenario, the estimated Project traffic volumes during A.M. and P.M. peak hours were added to the existing A.M. and P.M. peak-hour traffic volumes to determine the change in V/C ratios for the signalized study intersections and the corresponding LOS. Table IV.J-7 on page IV.J-53 summarizes the intersection LOS and V/C ratio under Existing With Project conditions during the weekday A.M. and P.M. peak hours for the study intersections and provides a comparison to the intersection LOS and V/C ratios under Existing Conditions (2017) in order to determine significant impacts. As shown therein, prior to mitigation the Project is expected to result in significant impacts at the following three intersections:

- Intersection No. 5: Beaudry Avenue & 2nd Street (P.M.)
- Intersection No. 8: Figueroa Street & 2nd Street (P.M.)
- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps (P.M.)

Therefore, under Existing With Project conditions prior to mitigation, the Project would conflict with an applicable plan, ordinance, or policy (i.e., LADOT criteria for determining impacts to intersection capacity) establishing measures of effectiveness for the performance of the circulation system. As such, the Project would have a significant traffic impact and would require mitigation, as discussed further below.

Future With Project Conditions

The analysis of Future With Project conditions identifies the potential impacts of the Project at full buildout on projected future traffic operating conditions during the typical weekday A.M. and P.M. peak hours by adding Project-generated traffic to the Future Without Project traffic forecasts for the year 2025. Table IV.J-8 on page IV.J-55 summarizes the intersection LOS and V/C ratio under Future With Project conditions during the weekday A.M. and P.M. peak hours for the study intersections and provides a comparison to the intersection LOS and V/C ratio under Future Without Project conditions in order to

Table IV.J-7
Intersection Levels of Service—Existing Conditions and Existing With Project Conditions (2017)

No.	Intersection	A.M. Peak						P.M. Peak					
		Existing Conditions		Existing With Project Conditions		Change in V/C	Signif. Impact?	Existing Conditions		Existing With Project Conditions		Change in V/C	Signif. Impact?
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
1	Belmont Ave./Loma Dr. & Beverly Blvd.	0.425	A	0.426	A	0.001	No	0.407	A	0.412	A	0.005	No
2	Glendale Blvd. & Court St./Laveta Terrace	0.469	A	0.475	A	0.006	No	0.368	A	0.372	A	0.004	No
3	Glendale Blvd./Lucas Ave. & Beverly Blvd./1st St./2nd St.	0.694	B	0.699	B	0.005	No	0.558	A	0.564	A	0.006	No
4	Beaudry Ave. & 1st St.	0.499	A	0.501	A	0.002	No	0.767	C	0.769	C	0.002	No
5	Beaudry Ave. & 2nd St.	0.640	B	0.647	B	0.007	No	0.896	D	0.910	E	0.014	**Yes**
6	Beaudry Ave. & SR-110 SB Off-Ramp	0.468	A	0.468	A	0.000	No	0.510	A	0.510	A	0.000	No
7	Beaudry Ave. & 3rd St./Miramar St.	0.761	C	0.761	C	0.000	No	0.519	A	0.519	A	0.000	No
8	Figueroa St. & 2nd St.	0.747	C	0.773	C	0.026	No	1.059	F	1.073	F	0.014	**Yes**
9	Figueroa St. & 3rd St./SR-110 Ramps	0.789	C	0.789	C	0.000	No	1.131	F	1.148	F	0.017	**Yes**
10	Figueroa St. & SR-110 On-Ramps/5th St.	0.563	A	0.564	A	0.001	No	0.835	D	0.840	D	0.005	No
11	Figueroa St. & SR-110 Off-Ramps/6th St.	0.672	B	0.680	B	0.008	No	0.614	B	0.616	B	0.002	No
12	Hill St. & 2nd St.	0.601	B	0.628	B	0.027	No	0.579	A	0.589	A	0.010	No
13	Broadway & US-101 SB Off-Ramp/Aliso St.	0.323	A	0.339	A	0.016	No	0.378	A	0.403	A	0.025	No
14	Broadway & Temple St.	0.550	A	0.572	A	0.022	No	0.565	A	0.576	A	0.011	No
15	Broadway & 1st St.	0.551	A	0.576	A	0.025	No	0.586	A	0.614	B	0.028	No
16	Broadway & 2nd St.	0.396	A	0.445	A	0.049	No	0.406	A	0.430	A	0.024	No
17	Broadway & 3rd St.	0.652	B	0.658	B	0.006	No	0.554	A	0.577	A	0.023	No

Table IV.J-7 (Continued)
Intersection Levels of Service—Existing Conditions and Existing With Project Conditions (2017)

No.	Intersection	A.M. Peak						P.M. Peak					
		Existing Conditions		Existing With Project Conditions		Change in V/C	Signif. Impact?	Existing Conditions		Existing With Project Conditions		Change in V/C	Signif. Impact?
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
18	Broadway & 4th St.	0.305	A	0.329	A	0.024	No	0.442	A	0.452	A	0.010	No
19	Spring St. & US-101 NB Off-Ramp	0.387	A	0.418	A	0.031	No	0.251	A	0.259	A	0.008	No
20	Spring St. & Aliso St.	0.353	A	0.375	A	0.022	No	0.146	A	0.166	A	0.020	No
21	Spring St. & Temple St.	0.610	B	0.633	B	0.023	No	0.381	A	0.387	A	0.006	No
22	Spring St. & 1st St.	0.413	A	0.436	A	0.023	No	0.315	A	0.320	A	0.005	No
23	Spring St. & 2nd St.	0.466	A	0.514	A	0.048	No	0.376	A	0.393	A	0.017	No
24	Spring St. & 3rd St.	0.565	A	0.571	A	0.006	No	0.462	A	0.519	A	0.057	No
25	Spring St. & 4th St.	0.370	A	0.373	A	0.003	No	0.459	A	0.471	A	0.012	No
26	Main St. & 1st St.	0.334	A	0.334	A	0.000	No	0.545	A	0.545	A	0.000	No
27	Main St. & 2nd St.	0.301	A	0.319	A	0.018	No	0.581	A	0.586	A	0.005	No
28	Main St. & 3rd St.	0.626	B	0.631	B	0.005	No	0.789	C	0.791	C	0.002	No
29	Main St. & 4th St.	0.230	A	0.234	A	0.004	No	0.743	C	0.747	C	0.004	No
30	Los Angeles St. & Aliso St./US-101 SB On-Ramp	0.209	A	0.212	A	0.003	No	0.614	B	0.625	B	0.011	No
31	Alameda St. & Arcadia St./US-101 NB Off-Ramp	0.530	A	0.539	A	0.009	No	0.630	B	0.632	B	0.002	No
32	US-101 SB Ramps/Garey St. & Commercial St.	0.299	A	0.301	A	0.002	No	0.467	A	0.481	A	0.014	No

Source: Linscott, Law & Greenspan, 2018.

Table IV.J-8
Intersection Levels of Service—Future Without Project Conditions and Future With Project Conditions (2025)

No.	Intersection	A.M. Peak						P.M. Peak					
		Future Without Project Conditions		Future With Project Conditions		Change in V/C	Signif. Impact?	Future Without Project Conditions		Future With Project Conditions		Change in V/C	Signif. Impact?
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
1	Belmont Avenue/Loma Drive & Beverly Boulevard	0.516	A	0.517	A	0.001	No	0.475	A	0.481	A	0.006	No
2	Glendale Boulevard & Court Street/Laveta Terrace	0.583	A	0.588	A	0.005	No	0.507	A	0.512	A	0.005	No
3	Glendale Boulevard/Lucas Avenue & Beverly Boulevard/1st Street/2nd Street	0.881	D	0.885	D	0.004	No	0.720	C	0.729	C	0.009	No
4	Beaudry Avenue & 1st Street	0.562	A	0.565	A	0.003	No	1.009	F	1.011	F	0.002	No
5	Beaudry Avenue & 2nd Street	0.788	C	0.796	C	0.008	No	1.101	F	1.115	F	0.014	**Yes**
6	Beaudry Avenue & SR-110 SB Off-Ramp	0.563	A	0.563	A	0.000	No	0.640	B	0.640	B	0.000	No
7	Beaudry Avenue & 3rd Street/Miramar Street	0.864	D	0.864	D	0.000	No	0.765	C	0.765	C	0.000	No
8	Figueroa Street & 2nd Street	1.091	F	1.117	F	0.026	**Yes**	1.408	F	1.414	F	0.006	No
9	Figueroa Street & 3rd Street/SR-110 Ramps	0.893	D	0.894	D	0.001	No	1.449	F	1.466	F	0.017	**Yes**
10	Figueroa Street & SR-110 On-Ramps/5th Street	0.798	C	0.799	C	0.001	No	1.136	F	1.142	F	0.006	No
11	Figueroa Street & SR-110 Off-Ramps/6th Street	0.889	D	0.897	D	0.008	No	0.903	E	0.905	E	0.002	No
12	Hill Street & 2nd Street	0.749	C	0.776	C	0.027	No	0.807	D	0.818	D	0.011	No
13	Broadway & US-101 SB Off-Ramp/Aliso Street	0.452	A	0.469	A	0.017	No	0.547	A	0.572	A	0.025	No
14	Broadway & Temple Street	0.698	B	0.720	C	0.022	No	0.762	C	0.772	C	0.010	No
15	Broadway & 1st Street	0.666	B	0.692	B	0.026	No	0.744	C	0.755	C	0.011	No
16	Broadway & 2nd Street	0.607	B	0.639	B	0.032	No	0.610	B	0.645	B	0.035	No
17	Broadway & 3rd Street	0.701	C	0.713	C	0.012	No	0.739	C	0.774	C	0.035	No

Table IV.J-8 (Continued)
Intersection Levels of Service—Future Without Project Conditions and Future With Project Conditions (2025)

No.	Intersection	A.M. Peak						P.M. Peak					
		Future Without Project Conditions		Future With Project Conditions		Change in V/C	Signif. Impact?	Future Without Project Conditions		Future With Project Conditions		Change in V/C	Signif. Impact?
		V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
18	Broadway & 4th Street	0.530	A	0.553	A	0.023	No	0.694	B	0.705	C	0.011	No
19	Spring Street & US-101 NB Off-Ramp	0.529	A	0.561	A	0.032	No	0.439	A	0.447	A	0.008	No
20	Spring Street & Aliso Street	0.495	A	0.517	A	0.022	No	0.265	A	0.285	A	0.020	No
21	Spring Street & Temple Street	0.744	C	0.767	C	0.023	No	0.520	A	0.527	A	0.007	No
22	Spring Street & 1st Street	0.519	A	0.542	A	0.023	No	0.443	A	0.449	A	0.006	No
23	Spring Street & 2nd Street	0.633	B	0.681	B	0.048	No	0.602	B	0.619	B	0.017	No
24	Spring Street & 3rd Street	0.774	C	0.780	C	0.006	No	0.671	B	0.685	B	0.014	No
25	Spring Street & 4th Street	0.593	A	0.596	A	0.003	No	0.739	C	0.751	C	0.012	No
26	Main Street & 1st Street	0.432	A	0.432	A	0.000	No	0.664	B	0.664	B	0.000	No
27	Main Street & 2nd Street	0.501	A	0.519	A	0.018	No	0.805	D	0.809	D	0.004	No
28	Main Street & 3rd Street	0.829	D	0.834	D	0.005	No	1.053	F	1.055	F	0.002	No
29	Main Street & 4th Street	0.413	A	0.416	A	0.003	No	0.991	E	0.996	E	0.005	No
30	Los Angeles Street & Aliso Street/US-101 SB On-Ramp	0.289	A	0.291	A	0.002	No	0.812	D	0.823	D	0.011	No
31	Alameda Street & Arcadia Street/US-101 NB Off-Ramp	0.929	E	0.941	E	0.012	**Yes**	0.941	E	0.943	E	0.002	No
32	US-101 SB Ramps/Garey Street & Commercial Street	0.528	A	0.531	A	0.003	No	0.760	C	0.774	C	0.014	No

Source: Linscott, Law & Greenspan, 2018.

determine significant impacts. As shown therein, prior to mitigation the Project is expected to result in significant impacts at the following four intersections:

- Intersection No. 5: Beaudry Avenue & 2nd Street (P.M.)
- Intersection No. 8: Figueroa Street & 2nd Street (A.M.)
- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps (P.M.)
- Intersection No. 31: Alameda Street & Arcadia Street/US-101 NB Off-Ramp (A.M.)

Therefore, under Future With Project conditions prior to mitigation, the Project would conflict with an applicable plan, ordinance, or policy (i.e., LADOT criteria for determining impacts to intersection capacity) establishing measures of effectiveness for the performance of the circulation system. As such, the Project would have a significant traffic impact and would require mitigation, as discussed further below.

(ii) Caltrans Analysis

The analysis conducted on Caltrans facilities included freeway mainline segments, ramp intersections, and off-ramp queuing. Four mainline freeway segments along SR-110 and US-101 were analyzed using the HCM operational analysis methodologies to determine density, speed, and corresponding LOS. Nine Caltrans ramp intersections were analyzed using the HCM operation analysis methodologies to determine average vehicular control delay and corresponding LOS. In addition, seven freeway off-ramps along SR-110 and US-101 were analyzed for ramp queue lengths. Details of this analysis are included in Appendix D of the Traffic Study for informational purposes.

(iii) Public Transit

As noted above, consistent with LADOT guidelines, transit trips were assumed to equal 25 percent of total person trips versus 15 percent per CMP guidelines because of the on-site Regional Connector rail station and portal. The Project is forecast to generate an estimated 266 transit trips during the weekday A.M. peak hour and 257 transit trips during the P.M. peak hour. As detailed in Table 4-3 of the Traffic Study, a total of 59 bus/rail lines and routes are provided adjacent to or in close proximity via transfers to the Project Site. As also shown therein, these lines provide services for an average of roughly 561 and 545 buses and trains during the weekday A.M. and P.M. peak hours, respectively. Therefore, based on the above calculated weekday A.M. and P.M. peak-hour transit trips, this would correspond to less than one additional transit rider per bus/train on average. Furthermore, the Project would be constructed atop the Metro Regional Connector 2nd Street/Broadway

rail station and portal, which will facilitate transit access and connectivity for the Project's population base and the surrounding area. It is anticipated that existing transit service in the area will adequately accommodate the increase associated with Project-generated transit trips. Given the expected additional average transit ridership per bus/train, no significant impacts on existing or future transit services in the area are expected to occur as a result of the Project. Nevertheless, should future demand for transit exceed available capacity levels within the study area, it is expected that Metro, LADOT DASH Transit, and other transit operators would adjust the capacities on affected routes consistent with their policies and objectives.

Therefore, the Project would not conflict with an applicable plan, ordinance, or policy (related to public transit) establishing measures of effectiveness for the performance of the circulation system, and, as such, impacts to public transit would be less than significant.

(iv) Pedestrian, Bicycle, and Vehicular Safety

As discussed above, the Project Site is located in an area characterized by a high degree of pedestrian activity. The Project would provide connections to the adjacent public sidewalks and would include site enhancements to promote walking. In particular, a landscaped paseo would be integrated with the Metro plaza on-site, thus creating a larger public plaza at Broadway and 2nd Street and forming a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. The paseo would feature pedestrian amenities such as benches and café seating.

The Project Site is accessible from nearby public bus and rail transit stops and would be situated atop the Metro Regional Connector 2nd Street/Broadway rail station and portal. The majority of pedestrian access to the Project Site is envisioned to occur via the existing public sidewalks provided along every street in the Downtown Los Angeles area. The Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed driveways would be designed to limit potential impediments to visibility, and the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site.

As previously described, a number of existing and proposed bicycle facilities (e.g., Class I bike paths, Class II bike lanes, Class III bike routes, bike-friendly streets, etc.) identified in the City's 2010 Bicycle Plan are located within an approximate 1-mile radius from the Project Site. Use of bicycles as a transportation mode to and from the Project Site would be encouraged by the provision of ample and safe bicycle parking on-site. The type of spaces and dimensions would be provided based on LAMC requirements, as well as to

meet the needs of a variety of bicycle types. Specifically, LAMC Section 12.21-A.16(a) includes bicycle parking requirements for both short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points. Long-term bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public. Based on LAMC Section 12.21-A.16(a), as shown in Table IV.J-9 on page IV.J-60, the Project would be required to provide, and would provide, 218 long-term bicycle parking spaces and 68 short-term bicycle parking spaces. The Project's bicycle parking spaces would be provided in readily accessible locations, and appropriate lighting would be provided to ensure safety and deter theft during night-time parking. Specifically, the 218 long-term bicycle parking spaces would be provided within the existing parking structure, and 68 short-term bicycle parking spaces would be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza, thus meeting LAMC requirements.

With respect to vehicular safety, please refer to the discussion below under Threshold (d).

Therefore, the Project would not conflict with an applicable plan, ordinance, or policy (related to bicycle, pedestrian, and vehicular safety) establishing measures of effectiveness for the performance of the circulation system. Impacts related to bicycle, pedestrian, and vehicular safety would be less than significant.

(v) Parking

As discussed above, since the Project is located in a transit priority area, the Project's parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Therefore, this analysis of Project parking is provided for informational purposes only.

Per LAMC parking requirements, the Project would require 628 vehicular parking spaces, based on bicycle parking and transit credit deductions, as well as 0.25 spaces per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2. The existing five-level parking structure located on the southern portion of the Project Site would be reconfigured to provide 1,436 vehicular parking spaces. Accordingly, the Project's parking requirement would be met and surplus parking would remain available for the nearby Los Angeles Times Square buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.

Regardless, pursuant to SB 743 and PRC Section 21099, the Project's parking impacts shall not be considered significant impacts on the environment as a matter of law.

Table IV.J-9
Required Bicycle Parking

Land Use	Units or Square Feet	LAMC Requirement[a]	Required Short-Term	Required Long-Term
Office	534,044 sf	1 space/10,000 sf (short term) 2 spaces/10,000 sf (long term)	53	107
Residential	107 du	0.1 space/du (short term) 1 space/du (long term)	11	107
Retail	7,200 sf	5 spaces/10,000 sf (short term) 5 spaces/10,000 sf (long term)	4	4
Subtotal			*68*	*218*
Total Bicycle Parking Required			**286 spaces**	
Total Bicycle Parking Provided			**286 spaces**	

du = dwelling units
sf = square feet
[a] *Pursuant to LAMC 12.21-A,16(a).*
Source: Linscott, Law & Greenspan, 2018.

Threshold (b): Would the Project conflict with an applicable congestion management program including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

(a) CMP Intersections

As previously noted, the nearest CMP intersections are Alameda Street & Washington Boulevard and Alvarado Street & Sunset Boulevard. Both of these CMP intersections are located outside the Project study area. The CMP traffic impact analysis guidelines require that intersection monitoring locations must be examined if the Project would add 50 or more trips during either the weekday A.M. and P.M. peak hours. The Project would add fewer than 50 peak-hour trips to these intersections during the weekday A.M. and P.M. peak hours. Specifically, the study intersection nearest Alameda Street & Washington Boulevard is Intersection No. 29 (Main Street & 4th Street), where the Project is forecast to generate 19 vehicle trips during the weekday A.M. peak hour and 25 vehicle trips during the weekday P.M. peak hour. The study intersection nearest Alvarado Street & Sunset Boulevard is Intersection No. 2 (Glendale Boulevard & Court Street/Laveta Terrace), where the Project is forecast to generate 17 vehicle trips during the weekday A.M. peak hour and 17 vehicle trips during the weekday P.M. peak hour. It is reasonable to

assume that Project-related traffic would begin to disperse further away from the Project site. Since the nearest CMP intersections are located beyond Intersection Nos. 2 and 29 from the Project Site, respectively, the Project-generated traffic at the CMP intersections is expected to be lower than those trips identified above.

Therefore, the Project would not conflict with guidelines established in the CMP, and, as such, impacts to the regional transportation system would be less than significant.

(b) CMP Freeway Segments

As previously noted, the nearest CMP freeway monitoring locations are US-101 north of Vignes Street, SR-110 south of US-101, and SR-110 at Alpine Street. The Project is forecast to add the specified number trips to these CMP freeway monitoring locations during the weekday A.M. and P.M. peak hours:

- US-101 north of Vignes Street:
  - 75 trips northbound/15 trips southbound (A.M.)
  - 19 trips northbound/68 trips southbound (P.M.)
- SR-110 south of US-101:
  - 7 trips northbound/37 trips southbound (A.M.)
  - 34 trips northbound/9 trips southbound (P.M.)
- SR-110 at Alpine Street:
  - 7 trips northbound/37 trips southbound (A.M.)
  - 34 trips northbound/9 trips southbound (P.M.)

The CMP traffic impact analysis guidelines require that freeway monitoring locations must be examined if the Project would add 150 or more trips (in either direction) during either the weekday A.M. and P.M. peak hours. The Project would add fewer than 150 peak-hour trips (in either direction) to these freeway monitoring locations during the weekday A.M. and P.M. peak hours.

Therefore, the Project would not conflict with guidelines established in the CMP, and, as such, impacts to the regional transportation system would be less than significant.

(c) CMP Transit

As discussed above, the Project is forecast to generate approximately 266 transit trips during the weekday A.M. peak hour and 257 transit trips during the P.M. peak hour. Based on the above calculated weekday A.M. and P.M. peak-hour transit trips, this would correspond to less than one additional transit rider per bus/train on average. It is therefore anticipated that the existing transit service in the area will adequately accommodate the increase of Project-generated transit trips. Given the expected additional average transit ridership per bus/train, less-than-significant Project impacts on transit services in the area are expected to occur. Nevertheless, should future demand for transit exceed available capacity levels within the study area, it is expected that Metro, LADOT DASH Transit, and other transit operators would adjust the capacities on affected routes consistent with their policies and objectives.

Accordingly, the Project would not conflict with CMP guidelines regarding transit, and impacts would be less than significant.

Threshold (c): Would the Project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR and evaluated in the Initial Study for the Project, included in Appendix A of this Draft EIR, the Project Site is not located in the vicinity of any public or private airport or planning boundary of any airport land use plan. The nearest airport is the Los Angeles International Airport located approximately 10.5 miles southwest of the Project Site. However, the proposed mixed-use building would extend more than 200 feet above existing grade. In accordance with Code of Federal Regulations Title 14, Section 77.13, the Applicant would be required to submit copies of Federal Aviation Administration (FAA) Form 7460-1 to the FAA Obstruction Evaluation Service (OES). The OES would then evaluate the Project, and any OES recommendations would be incorporated into the building's design, including protocols pertaining to building markings and lighting. Implementation of required design features and lighting would ensure that impacts associated with air traffic safety would be less than significant.

Thus, the Project would have a less than significant impact with respect to air traffic safety, as referenced in Threshold (c), and no mitigation measures are required. No further investigation and analysis is required for this issue.

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR and evaluated in the Initial Study for the Project, included in Appendix A of this Draft EIR, the Project's design does not include hazardous features. The roadways adjacent to the Project Site are part of the local roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses, as the proposed uses are consistent with other commercial and residential uses in the Project vicinity. Thus, no impacts related to increased hazards due to a design feature or incompatible use would occur.

Thus, the Project would have no impact with respect to hazardous design features, as referenced in Threshold (d), and no mitigation measures are required. No further investigation and analysis is required for this issue.

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

(a) Construction

Construction activities associated with the Project could potentially impact the provision of emergency services by the Los Angeles Fire Department (LAFD) and the Los Angeles Police Department (LAPD) in the vicinity of the Project Site as a result of construction-related traffic impacts to the surrounding roadways. As discussed above, Project construction would not result in any significant traffic impacts at the study intersections, but may involve temporary lane closure(s). The Construction Traffic Management Plan set forth in Project Design Feature TR-PDF-1 would require coordination with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses during construction. In addition, if required, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas, including areas near any temporary travel lane closure(s). Construction activities associated with the Project are not expected to have a detrimental effect on emergency response times.

Therefore, the Project would not result in inadequate emergency access, and impacts to emergency access during Project construction would be less than significant.

(b) Operation

As described in Section II, Project Description, of this Draft EIR, vehicular access for the Project Site would be provided via one existing driveway on Broadway and three

driveways (including two existing driveways) on Spring Street. Based on the *L.A. CEQA Thresholds Guide* guidance described earlier, the Project's potential impacts on operating conditions at the intersections nearest the primary site access points (i.e., Intersection Nos. 16, 17, 23, and 24) were studied. As shown in Table IV.J-8 on page IV.J-55, Intersection Nos. 16, 17, 23, and 24 are projected to operate at LOS B or better during the A.M. and P.M. peak hours under Existing With Project conditions and LOS C or better during the A.M. and P.M. peak hours under Future With Project conditions.

All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project.

Therefore, the Project would not result in inadequate emergency access, and impacts to emergency access would be less than significant.

Threshold (f): Would the Project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

As described above, the Project would implement a multi-modal transportation strategy that includes multiple vehicular access points for adequate and convenient access, enhanced transit and pedestrian access, and a safe internal pedestrian circulation plan with minimal vehicular conflicts.

As also previously discussed, the Metro Regional Connector 2nd Street/Broadway rail station and portal, currently under construction, would be located at the northwest corner of the Project Site. The proposed mixed-use building would be built above the Metro portal, and the portal plaza would be integrated with a paseo traversing the Project Site, thus creating a larger public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street. This landscaped passage or paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. The paseo would include landscaping as well as pedestrian amenities such as benches and café seating. Pedestrian access to the on-site parking structure would be provided from the paseo, thus minimizing vehicular conflicts.

As also discussed above bicycle usage would be encouraged by the provision of ample and safe bicycle parking. Based on LAMC Section 12.21-A.16(a) and shown in Table IV.J-9

on page IV.J-60, the Project would be required to provide, and would provide, 218 long-term bicycle parking spaces and 68 short-term bicycle parking spaces. The Project's bicycle parking spaces would be provided in readily accessible locations, and appropriate lighting would be provided to ensure safety and deter theft during night-time parking. Specifically, the 218 long-term bicycle parking spaces would be provided within the existing parking structure, and 68 short-term bicycle parking spaces would be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza, thus meeting LAMC requirements.

Therefore, the Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. As such, impacts to public transit, bicycle, and pedestrian facilities would be less than significant.

4. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft EIR, 173 related projects in the surrounding area are expected to be constructed and/or operational during the same time period as the Project. Much of this growth is anticipated by the City and will be incorporated into the Central City Community Plan update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing (refer to Section IV.F, Land Use, of this Draft EIR for further discussion). According to the DTLA 2040 projections, an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.[24]

a. Construction Impacts

Of the 173 related projects identified within the Project vicinity, it is possible that the construction phases of over 130 related projects could potentially overlap with at least some of the Project's construction activities, thereby compounding construction traffic levels on the roadways near the Project Site.[25] Cumulative construction traffic impacts could include decreased roadway and intersection capacity due to lane closures, re-routing of vehicle and bicycle traffic, sidewalk closures and pedestrian re-routing, bus stop

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[24] *Growth projections current as of December 2018. Source: City of Los Angeles, DTLA 2040, About This Project, www.dtla2040.org/, accessed December 6, 2018.*

[25] *As shown in Table III-1 in Section III, Environmental Setting, of this Draft EIR, 39 of the 173 related projects are currently under construction or have already been built. As such, for purposes of this cumulative construction traffic impacts analysis, it is assumed that construction of those related projects would not overlap with the Project's construction phase, which is anticipated to begin in 2022.*

relocation and bus line re-routing, and shorter lines of sight, all of which would impede the flow of traffic within the Project area.

Although the particular traffic effects associated with construction activities would be temporary in nature, the exact duration of cumulative construction activities cannot be accurately predicted. Moreover, the specific construction characteristics of most of the related projects are not yet known. It is expected that the vast majority of the related projects would include Construction Traffic Management Plans similar to that of the Project, which would require that many, and likely most, of the construction workers for the related projects arrive and depart individual construction sites during off-peak hours. As previously discussed, implementation of Project Design Feature TR-PDF-1 would avoid Project deliveries of construction materials and the hauling/transport of oversize loads during peak travel periods to the extent possible, and it is reasonable to assume that most if not all of the related projects would include similar project design feature(s) to limit or preclude peak-period construction truck trips. In addition, related projects would be required to comply with City requirements regarding haul routes and would implement any necessary mitigation measures to reduce impacts.

Although potential cumulative construction traffic impacts could occur, such impacts would be temporary in nature and would be highly variable depending on the timing and intensity of the Project's construction activities in relation to the phasing of construction activities of each of the related projects. Due to the temporary nature of potential Project and cumulative-level traffic impacts associated with construction activities and required compliance with LADOT and BSS procedures to minimize traffic disruptions during construction, the Project's construction-related traffic impacts are considered less than significant and not cumulatively considerable.

b. Operational Impacts

The traffic models used in the above analysis incorporated forecasted traffic increases due to ambient growth as well as the related projects through the year 2025. Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, the regional transportation system, and access as a result of the Project are accounted for in the analysis above.

(1) Intersection Levels of Service

As detailed above in Table IV.J-8 on page IV.J-55, under cumulative conditions (Future With Project conditions), the Project would result in the following significant traffic

impacts at two study intersections during the A.M. peak hour and two study intersections during the P.M. peak hour:

- Intersection No. 5: Beaudry Avenue & 2nd Street (P.M.)
- Intersection No. 8: Figueroa Street & 2nd Street (A.M.)
- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps (P.M.)
- Intersection No. 31: Alameda Street & Arcadia Street/US-101 NB Off-Ramp (A.M.)

Therefore, the Project's contribution to impacts under cumulative conditions would be considerable, and cumulative impacts would be significant at the intersections impacted by the Project.

(2) Regional Transportation System/Congestion Management Program

As described above, the Project would add fewer than 150 trips along the freeway monitoring stations closest to the Project Site during the A.M. and P.M. peak hours. In addition, the Project would not add more than 50 vehicle trips during the A.M. and P.M. peak hours at the CMP arterial monitoring stations nearest the Project Site. Furthermore, the Project would not result in significant transit impacts.

Therefore, no significant CMP or transit impacts would occur under the Project, and, as a result, the Project's contribution to cumulative impacts would not be cumulatively considerable. Thus, the Project's cumulative impacts with regard to the CMP and transit would be less than significant.

(3) Access and Circulation

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. Like the Project, the related projects would be anticipated to provide for safe and efficient circulation including adequate sight distances, implement multi-modal transportation strategies to facilitate the dispersal of traffic, and alleviate project-specific traffic access impacts, as appropriate. In addition, as previously discussed, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas, including areas near any temporary travel lane closure(s). Furthermore,

since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected.

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

(4) Bicycle, Pedestrian, and Vehicular Safety

As analyzed above, Project impacts related to bicycle, pedestrian, and vehicular safety would be less than significant. In addition, as with the Project, it is anticipated that future related projects would be subject to City review to ensure that they are designed with adequate bicycle and pedestrian access/circulation, including standards for sight distance, sidewalks, crosswalks, and pedestrian movement controls. Furthermore, bicycle, pedestrian, and related circulation improvements are largely confined to a project site and the immediately surrounding area, thus reducing the potential for a combination of project-specific impacts with those of other related projects that could lead to cumulative impacts.

Thus, Project impacts with regard to bicycle, pedestrian, and vehicular safety would not be cumulatively considerable, and cumulative impacts would be less than significant.

5. Mitigation Measures

a. Construction

Project-level and cumulative traffic, access, safety, and public transit impacts during construction would be less than significant. Therefore, no mitigation measures are required.

b. Operation

Operational traffic impacts to access and circulation, public transit, and bicycle, pedestrian, and vehicular safety would be less than significant. However, operational impacts to intersection levels of service would be significant under Existing With Project and Future With Project conditions, and operational impacts to freeway off-ramp intersections would be significant under Existing With Project and Future With Project conditions. Therefore, the following mitigation is proposed:

TR-MM-1: To enhance the traffic signal system in the Project study area and in response to the forecast significant Project impacts, the Project Applicant shall contribute a fixed-fee financial contribution toward funding traffic signal upgrades for the following study intersections along the Figueroa Street and Alameda Street corridors:

- Intersection No. 8: Figueroa Street & 2nd Street
- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps
- Intersection No. 31: Alameda Street & Arcadia Street/US-101 NB Off-Ramp.

Based on coordination with LADOT and as indicated in LADOT's assessment letter, the funding contribution towards the above traffic signal upgrades will total approximately $105,000.00. This, and any other required financial fair-share contributions, must be guaranteed prior to issuance of the Project's building permit and completed prior to the issuance of the Project's certificate of occupancy. Also, any Project-related financial fair-share contribution payments must be deposited into the appropriate City account prior to issuance of the Certificate of Occupancy.

6. Level of Significance after Mitigation

(1) Construction

Project-level and cumulative impacts with regard to construction-related traffic, access, safety, and public transit would be less than significant. Therefore, no mitigation measures are required.

(2) Operation

(a) Intersection Level of Service

(i) Existing With Project Conditions

As summarized in Table IV.J-10 on page IV.J-70, implementation of Mitigation Measure TR-MM-1 would reduce the Project's significant impacts during the P.M. peak hour at two of the three impacted intersections to a less-than-significant level. Intersection No. 5, Beaudry Avenue & 2nd Street, would remain significantly impacted during the P.M. peak hour. While physical improvements may be available to reduce Project impacts at this location (e.g., restriping the westbound approach to provide one left-turn lane, one through lane, and one shared through/right-turn lane), these improvements may involve the removal of an existing bicycle facility, which would be incompatible with City's mobility

Table IV.J-10
Existing With Project With Mitigation Program—Significant Impact Analysis

No.	Intersection	A.M. Peak										P.M. Peak									
		Existing Without Project Conditions		Existing With Project Conditions		Change in V/C	Signif. Impact?	Existing With Project With Mitigation Conditions		Change in V/C	Signif. Impact?	Existing Without Project Conditions		Existing With Project Conditions		Change in V/C	Signif. Impact?	Existing With Project With Mitigation Conditions		Change in V/C	Signif. Impact?
		V/C	LOS	V/C	LOS			V/C	LOS			V/C	LOS	V/C	LOS			V/C	LOS		
5	Beaudry Avenue & 2nd Street	0.640	B	0.647	B	0.007	No	0.647	B	0.007	N/A	0.896	D	0.910	E	0.014	**Yes**	0.910	E	0.014	**Yes**
8	Figueroa Street & 2nd Street	0.747	C	0.773	C	0.026	No	0.763	C	0.016	N/A	1.059	F	1.073	F	0.014	**Yes**	1.063	F	0.004	No
9	Figueroa Street & 3rd Street/SR-110 Ramps	0.789	C	0.789	C	0.000	No	0.779	C	−0.010	N/A	1.131	F	1.148	F	0.017	**Yes**	1.138	F	0.007	No

N/A = Not applicable because no significant impact would occur prior to mitigation.
Source: Linscott, Law & Greenspan, 2018.

policies. As a result, Project impacts at this intersection would remain significant and unavoidable.

(ii) Future With Project Conditions

As shown in Table IV.J-11 on page IV.J-72, implementation of Mitigation Measure TR-MM-1 would reduce the Project's significant impacts at two of the four impacted intersections to a less-than-significant level. Intersection No. 8, Figueroa Street & 2nd Street, would remain significantly impacted during the A.M. peak hour, and Intersection No. 5, Beaudry Avenue & 2nd Street, would remain significantly impacted during the P.M. peak hour. While physical improvements may be available to reduce Project impacts at these locations (e.g., restriping the westbound approach to provide one left-turn lane, one through lane, and one shared through/right-turn lane at Intersection No. 5, and restriping the eastbound approach to provide one left-turn lane, one through lane, and one shared through/right-turn lane at Intersection No. 8), these improvements may involve the removal of existing bicycle facilities, which would be incompatible with City's mobility policies. As a result, Project impacts at these two intersections would remain significant and unavoidable.

(b) Regional Transportation System/Congestion Management Program

Impacts to CMP freeway segments, arterial monitoring stations, and transit would be less than significant without mitigation.

(c) Access and Circulation

Impacts to access and circulation would be less than significant without mitigation.

(d) Bicycle, Pedestrian, and Vehicular Safety

Impacts related to bicycle, pedestrian, and vehicular safety would be less than significant without mitigation.

Table IV.J-11
Future With Project With Mitigation Program—Significant Impact Analysis

No.	Intersection	A.M. Peak										P.M. Peak									
		Future Without Project Conditions		Future With Project Conditions		Change in V/C	Signif. Impact?	Future With Project With Mitigation Conditions		Change in V/C	Signif. Impact?	Future Without Project Conditions		Future With Project Conditions		Change in V/C	Signif. Impact?	Future With Project With Mitigation Conditions		Change in V/C	Signif. Impact?
		V/C	LOS	V/C	LOS			V/C	LOS			V/C	LOS	V/C	LOS			V/C	LOS		
5	Beaudry Avenue & 2nd Street	0.788	C	0.796	C	0.008	No	0.796	C	0.008	N/A	1.101	F	1.115	F	0.014	**Yes**	1.115	F	0.014	**Yes**
8	Figueroa Street & 2nd Street	1.091	F	1.117	F	0.026	**Yes**	1.107	F	0.016	**Yes**	1.408	F	1.414	F	0.006	No	1.404	F	−0.004	N/A
9	Figueroa Street & 3rd Street/SR-110 Ramps	0.893	D	0.894	D	0.001	No	0.884	D	−0.009	N/A	1.449	F	1.466	F	0.017	**Yes**	1.456	F	0.007	No
31	Alameda Street & Arcadia Street/US-101 NB Off-Ramps	0.929	E	0.941	E	0.012	**Yes**	0.931	E	0.002	No	0.941	E	0.943	E	0.002	No	0.933	E	−0.008	N/A

N/A = Not applicable because no significant impact would occur prior to mitigation.
Source: Linscott, Law & Greenspan, 2018.