

Section 3.10

Ground Transportation**SECTION SUMMARY**

Section 3.10, Ground Transportation, provides the following:

- a description of existing ground transportation conditions in the study area;
- a description of applicable program and regulations regarding ground transportation;
- a discussion on the methodology used to determine whether the Proposed Project or alternatives would result in significant impacts on ground transportation;
- an impact analysis of the Proposed Project; and
- a description of feasible mitigation measures proposed to reduce significant adverse impacts.

Key Points of Section 3.10

Impacts of the Proposed Project were qualitatively assessed in relation to potential conflicts with area plans, design features, and emergency access, and quantitatively assessed for the vehicle miles traveled (VMT) indexed to the number of employees as prescribed in the LADOT Transportation Assessment Guidelines (LADOT 2022). The VMT associated with commercial or heavy-duty trucks is not used to assess potential significant transportation impacts consistent with CEQA Guidelines section 15064.3(a). The VMT analysis required for purposes of CEQA is focused on employee auto trips related to the project, not on heavy-duty drayage trucks serving the B121-131 Terminal.

The Proposed Project and both alternatives would not conflict with local or regional plans or policies related to circulation, would not increase roadway hazards, and would not result in inadequate emergency access. Impacts of the Proposed Project and the alternatives related to automobile VMT would be less than significant, and no mitigation is required. An analysis of the impacts of truck VMT is not required by the CEQA. However, for informational purposes, this Draft EIR includes an analysis of the effects of Project related truck traffic on local roadways in Appendix C2 Ground Transportation and Level of Service Analysis.

3.10.1 Introduction

Transportation impacts associated with construction and operation of the Proposed Project and alternatives are assessed by their effect on ground transportation resources in the immediate area of the Proposed Project and the surrounding region. This section provides a summary of the transportation impact analysis. The transportation analysis includes assessment of:

- Potential conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities;
- Vehicle miles traveled conditions;
- Hazards due to a geometric design feature or incompatible use; and
- Emergency access.

3.10.2 Environmental Setting

The B121-131 Terminal generates vehicular traffic as a result of employee commutes and drayage truck activity hauling cargo to and from the terminal. That traffic utilizes the local and regional roadway infrastructure. In addition, some employees may use bus and bicycle infrastructure, and some of the cargo travels to and from the terminal by train, utilizing the WBICTF on-dock railyard. In the baseline year 2019, the terminal had 182 employees and moved approximately 354,000 TEUs of containerized cargo and a certain amount of non-containerized cargo. That activity generated approximately 111,000 employee auto one-way trips, 160,000 one-way truck trips and 141 train visits during 2019 (Table 3.10-1).

Table 3.10-1: B121-131 Terminal Baseline Transportation Activity

Activity	CEQA Baseline
Work Force (number of employees)	182
Annual Auto Trips (one-way trips/year)	111,020
Truck Trips (one-way trips/year)	159,641
Train trips (visits/year)	141

3.10.2.1 Regional and Local Access

The project site is located in the West Basin Container Terminal, within an industrial area of the Inner Harbor area of the Port of Los Angeles. The site is within the Port of Los Angeles Community Plan area in the City of Los Angeles, which is adjacent to the communities of San Pedro and Wilmington, and approximately 20 miles south of downtown Los Angeles. The site is on the eastern side of John S. Gibson Boulevard.

Access to and from the Project site is provided by a network of arterial routes and freeways. The arterial street network that serves the Proposed project area includes John S. Gibson Boulevard, Harry Bridges Boulevard, Figueroa Street, Alameda Street, Anaheim Street, Henry Ford Avenue, Sepulveda Boulevard/ Willow Street, Front Street, Harbor Boulevard, and Pacific Avenue. The freeway network consists of the Harbor Freeway (I-110), the Long Beach Freeway (I-710), the San Diego Freeway (I-405), and the Terminal Island Freeway (SR-103/SR-47). John S. Gibson Boulevard is defined as a Truck Route (vehicle weight greater than three tons) in the City of Los Angeles Mobility Plan 2035.

1 **3.10.2.2 Baseline Transit Service**

2 Transit agencies providing service near the Project site are Metro, Los Angeles
 3 Department of Transportation Commuter Express, and DASH service. Together, these
 4 transit agencies operated six transit routes in the baseline year near the Proposed Project,
 5 which are summarized in Table 3.10-2.

Table 3.10-2: Baseline Transit Service

Transit Agency	Line	Route Name	Days of Operation	Headways/Frequency	
Metro	J (Silver) Line	Exposition Park-San Pedro via Harbor Transitway	Monday–Friday	A.M.	10 minutes
				P.M.	10 minutes
			Weekend Peak		40 minutes
	Local 205	Willowbrook -San Pedro via Wilmington Ave and Vermont Ave	Monday–Friday	A.M.	60 minutes
				P.M.	60 minutes
			Weekend Peak		60 minutes
	Local 246	San Pedro-Artesia TC via Pacific Ave and Avalon Blvd	Monday–Friday	A.M.	20–25 minutes
				P.M.	20 minutes
			Weekend Peak		40 minutes
LADOT Commuter Express	142	San Pedro–Long Beach	Monday–Friday	A.M.	30 minutes
				P.M.	30 minutes
			Weekend Peak		60 minutes
LADOT DASH	LDWLM	Wilmington Area	Monday–Friday	A.M.	15 minutes
				P.M.	15 minutes
			Weekend Peak		15 minutes
	LDSP	San Pedro Area	Monday–Friday	A.M.	20 minutes
				P.M.	20 minutes
Weekend Peak		20 minutes			

6 **3.10.2.3 Baseline Bicycle and Pedestrian Conditions**

7 Port terminal workers predominately report to union halls before traveling to terminals
 8 each day, necessitating auto or union hall shuttles for work commute trips. Accordingly,
 9 bicycle and pedestrian access to the terminal site is expected to continue to be negligible.
 10 Outside the main gate of the terminal, the intersection of John S. Gibson with the I-110
 11 northbound ramps has sidewalks on both sides and crosswalks on the east and north sides
 12 of the intersection. John S. Gibson Boulevard has bicycle lanes on each side of the
 13 roadway. In the baseline year there were no bicycle or pedestrian facilities that continue
 14 east of the intersection of the terminal entrance and Knoll Drive.

1 The 2010 City of Los Angeles Bicycle Master Plan designates a number of Class II and
2 Class III bicycle facilities (lanes and routes) in the City of Los Angeles. These
3 designations were integrated into the City of Los Angeles Mobility Plan 2035 which
4 defines John S. Gibson Boulevard as a Boulevard II roadway and a Tier 2 Bicycle Lane
5 roadway from Channel Street to Figueroa Street. The sidewalk adjacent to John S.
6 Gibson Boulevard is designated as part of the City of Los Angeles’s Bicycle Enhanced
7 Network (Low Stress Network) as a Bicycle Path which would connect San Pedro with
8 the Wilmington Waterfront.

9 **3.10.3 Applicable Regulations**

10 Transportation analysis in the state of California is guided by policies and standards set at
11 the state level under the CEQA Guidelines and local jurisdictions as lead agencies. Since
12 the Proposed Project is in the City of Los Angeles, it would adhere to the adopted City
13 transportation policies.

14 **3.10.3.1 CEQA Guidelines 2019 Amendments**

15 A comprehensive update to the CEQA Guidelines (Public Resources Code section 21000,
16 et seq.) went into effect in 2019. Revisions to the Guidelines relevant to transportation
17 impacts originate from Senate Bill 743 (SB 743), signed by Governor Brown in 2013,
18 which directed the Governor’s Office of Planning and Research (OPR) to develop
19 revisions to the Guidelines:

20 “establishing criteria for determining the significance of transportation impacts of
21 projects within transit priority areas . . . that promote the reduction of greenhouse
22 gas emissions, the development of multimodal transportation networks, and a
23 diversity of land uses” and to “recommend potential metrics to measure
24 transportation impacts that may include, but are not limited to, vehicle miles
25 traveled, vehicle miles traveled per capita, automobile trip generation rates, or
26 automobile trips generated.”

27 Implementing SB 743, new Guidelines section 15064.3 establishes automobile vehicle
28 miles traveled (VMT) as the most appropriate measure of transportation impacts. In
29 December 2018, OPR issued a new guidance containing technical recommendations
30 regarding assessment of VMT, thresholds of significance, and mitigation measures. The
31 guidance also clarified that Guidelines section 15064.3 refers specifically to the amount
32 and distance of automobile travel attributable to a project, but not of travel by heavy-duty
33 vehicles.

34 The previous focus on vehicle operating conditions at intersections and on freeway
35 segments (level of service, or LOS, analysis) is no longer the basis for environmental
36 impact assessment. Given the previous long-standing practice of LOS operations
37 assessment in environmental analysis, however, LOS analysis of nearby intersection
38 locations is included in Appendix C-2 for informational purposes, although no CEQA or
39 NEPA impact determinations are made based on that analysis, per SB 743 and the CEQA
40 Guidelines.

41 The City of Los Angeles Transportation Assessment Guidelines (LADOT 2022) conform
42 to the requirements of Senate Bill 743. They incorporate updates to the CEQA guidelines
43 proposed by OPR and OPR’s further guidance and are consistent with and implement the
44 City of Los Angeles CEQA Thresholds Guide update. The City updated its travel demand

1 forecasting model and transportation impact thresholds to be consistent with the VMT
2 impact methodology.

3 The Transportation Assessment Guidelines provide the process to assess CEQA analysis
4 of transportation impacts for:

- 5 • Conflicting with Plans, Programs, Ordinances, or Policies
- 6 • Causing Substantial Automobile Vehicle Miles Traveled
- 7 • Substantially Inducing Additional Automobile Travel (from a Transportation
8 Projects)
- 9 • Substantially Increasing Hazards Due to a Geometric Design Feature or
10 Incompatible Use
- 11 • Project Access Safety and Circulation Evaluation (Adequate Emergency Access)

12 Each impact assessment includes a methodology and thresholds for screening criteria and
13 impact criteria.

14 **3.10.4 Impacts and Mitigation Measures**

15 **3.10.4.1 Methodology**

16 The methodologies used to analyze transportation impacts are based on the LADOT
17 Transportation Assessment Guidelines (Guidelines; LADOT 2022). The transportation
18 study for the Proposed Project was performed in 2022 but a technical review of the study
19 in 2025 confirmed that its analysis of future-year conditions is still valid.

20 Impacts of the Proposed Project were qualitatively assessed relative to potential conflicts
21 with area plans, design features, and emergency access, and quantitatively assessed
22 relative to VMT as prescribed in the Guidelines. The VMT analysis is applicable for both
23 CEQA and NEPA assessment.

24 **Automobile Vehicle Miles Traveled Analysis**

25 The Port of Los Angeles is an integral participant in regional collaboration for air quality
26 and transportation conformity, achievement of SB 375 greenhouse gas emissions targets,
27 and other long range transportation planning activities. The baseline and future forecasted
28 conditions for the Port of Los Angeles and assessed as part of the Southern California
29 Association of Governments Regional (SCAG) Transportation Plan/Sustainable
30 Communities Strategy. The parent model of the PortTAM travel model is the SCAG
31 Transportation Plan/Sustainable Communities Strategy travel demand model developed
32 using the TransCAD software and includes several of the same assumptions for regional
33 population, employment and transportation system growth. The Guidelines also provide a
34 spreadsheet-based tool for VMT analysis, called the LADOT VMT Calculator, whose
35 inputs are calculated from the City of Los Angeles Travel Demand model which was
36 derived from the same SCAG parent model as PortTAM.,

37 The VMT analysis was conducted both with the PortTAM Model and the LADOT VMT
38 Calculator, which returned similar outputs for the assessment of the Proposed Project.
39 Appendix C1 contains details of the models and the modeling input assumptions and data
40 used in the analysis.

41 Table 3.10-3 shows the automobile VMT per trip for the baseline, Proposed Project, and
42 alternatives as derived from the PortTAM Model. The analysis assumes two daily one-

1 way trips per employee during a working year of 305 days. These figures are used in the
2 impact assessment.

Table 3.10-3: B121-131 Employee Autos Terminal Trip Generation

Activity	CEQA Baseline	Proposed Project	No Federal Action	No Project
Work Force (number of employees)	182	742	468	468
Daily Auto Trips (one-way trips/day)	364	1484	936	936
Annual Auto Trips (one-way trips/year)	111,020	452,620	285,480	285,480
Average trip length (VMT, miles/one-way trip)	10.1	10.1	10.1	10.1

3 3.10.4.2 CEQA Baseline

4 Section 15125 of the CEQA Guidelines requires EIRs to include a description of the
5 physical environmental conditions in the vicinity of a project that exist at the time of the
6 NOP. These environmental conditions normally constitute the baseline physical
7 conditions from which the CEQA lead agency determines whether a project would result
8 in a potentially significant adverse impact. As described more fully in Section 2.7.1, the
9 CEQA baseline conditions for this Draft EIS/EIR reflect the activity at the terminal for
10 calendar year 2019, which is described in Section 3.10.2 and Tables 3.10-1 and 3.10-3.

11 3.10.4.3 NEPA Baseline

12 The evaluation of significance under NEPA is defined by comparing the Proposed Project
13 or other alternative to the NEPA baseline. The NEPA baseline conditions are described in
14 Section 2.7.2 and summarized in Table 2-1 in Chapter 2, Project Description. The NEPA
15 baseline condition for determining significance of impacts includes the full range of
16 construction and operational activities the applicant could implement and is likely to
17 implement absent a federal action, in this case the issuance of a USACE permit.

18 For this Draft EIS/EIR, the NEPA baseline (in this case equivalent to the No Federal
19 Action Alternative) would not include any construction in or over navigable waters of the
20 United States but would include the backlands improvements associated with expansion
21 of the WBICTF on-dock railyard and a new, extended lease. Existing operations —
22 including projected growth in goods movement using existing wharf and berth
23 infrastructure — would continue up to the terminal's maximum physical capacity. NEPA
24 future baseline transportation conditions were estimated by assuming funded
25 transportation improvements, traffic due to regional traffic growth, and traffic increases
26 resulting from Port terminal throughput growth, which includes some growth in
27 operations at the B121-131 Terminal that would occur in the absence of a USACE permit
28 (i.e., the No Federal Action Alternative).

3.10.4.4 Thresholds of Significance

A project in the Port is considered to have a significant transportation/circulation impact if the project would result in one or more of the following occurrences. These criteria are based on the Guidelines and are used as the basis for determining the impacts of the Proposed Project and alternatives under CEQA and NEPA.

TRANS – 1: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Guidelines provide three screening criteria questions that must be answered in order to determine potential impacts under this threshold.

- Does the project require a discretionary action that requires the decision maker to find that the project would substantially conform to the purpose, intent, and provisions of the general plan?
- Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?
- Is the project required to or proposing to make any voluntary modifications to the public right-of-way (e.g., dedications and/or improvements in the right-of-way, reconfigurations of curb line)?

A project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent.

Project Construction Screening Criteria

The Guidelines Section 3.4 addresses the analysis of Project construction and includes screening criteria for activities associated with project construction and major in-street construction of infrastructure projects.

If the answer is yes to any of the following questions, further analysis will be required to assess if the project could negatively affect existing pedestrian, bicycle, transit, or vehicle circulation:

- Would the project require construction activities to take place within the right-of-way of a Boulevard or Avenue (as designated in the Mobility Plan 2035) which would necessitate temporary lane, alley, or street closures for more than one day (including day and evening hours, and overnight closures if on a residential street)?
- Would the project require construction activities to take place within the right-of-way of a Collector or Local Street (as designated in the Mobility Plan 2035) which would necessitate temporary lane, alley, or street closures for more than seven days (including day and evening hours, and including overnight closures if on a residential street)?
- Would in-street construction activities result in the loss of regular vehicle, bicycle, or pedestrian access, including loss of bicycle parking to an existing land use for more than one day, including day and evening hours and overnight closures if access is lost to residential units?

- 1 • Would in-street construction activities result in the loss of regular ADA
2 pedestrian access to an existing transit station, stop, or facility (e.g., layover
3 zone) during revenue hours?
- 4 • Would in-street construction activities result in the temporary loss for more than
5 one day of an existing bus stop or rerouting of a bus route that serves the project
6 site?
- 7 • Would construction activities result in the temporary removal and/or loss of on-
8 street metered parking for more than 30 days?
- 9 • Would the project involve a discretionary action to construct new buildings or
10 additions of more than 1,000 square feet that require access for hauling
11 construction materials and equipment from streets less than 24- feet wide in a
12 hillside area?

13 In addition to the screening criteria above, LADOT Assessment Guidelines require a non-
14 CEQA project construction transportation analysis. That analysis is included in Appendix
15 C2.

16 **TRANS – 2: Would the Project conflict or be inconsistent with CEQA Guidelines**
17 **section 15064.3, subdivision (b)?**

18 CEQA Guidelines Section 15064.3 subdivision (b), provides criteria for analyzing
19 transportation impacts. The guidelines state that a significant impact may occur if vehicle
20 miles traveled (VMT) exceed an applicable threshold of significance. The section defines
21 "vehicle miles traveled" as the amount and distance of automobile travel attributable to a
22 project. According to OPR's guidance, this definition does not include VMT related to
23 commercial or heavy-duty trucks in the transportation analysis. That is, the VMT analysis
24 required for purposes of CEQA is focused on employee auto trips related to the project,
25 not on heavy-duty drayage trucks. However, the impact of these drayage vehicles is
26 analyzed in other resource areas, such as Air Quality, Greenhouse Gas Emissions, Noise,
27 and Energy, and an analysis of traffic impacts on levels-of service (LOS) at key
28 intersections is provided, for informational purposes, in Appendix C2.

29 Since the Proposed Project would generate 250 or more daily automobile vehicle trips it
30 would not be screened out from VMT analysis based on the Guidelines.

31 The Project would have a potential impact if the Project would generate work VMT per
32 employee exceeding 15 percent below the existing average work VMT per employee for
33 the Area Planning Commission (APC) in which the project is located. The project is
34 located in the Harbor APC, which has a daily work VMT per employee threshold of 12.3
35 VMT.

36 **TRANS – 3: Would the project substantially increase hazards due to a geometric**
37 **design feature (e.g., sharp curves or dangerous intersections) or**
38 **incompatible uses (e.g., farm equipment)?**

39 The LADOT Transportation Assessment Guidelines provide two screening criteria
40 questions that must be answered in order to determine whether the Project would result in
41 impacts due to geometric design hazards or incompatible uses.

- 42 • Is the project proposing new driveways, or introducing new vehicle access to the
43 property from the public right-of-way?

- 1 • Is the project proposing to, or required to make any voluntary or required,
2 modifications to the public right-of-way (e.g., street dedications, reconfigurations
3 of curb line)?

4 Preliminary project access plans are to be reviewed in light of commonly accepted traffic
5 engineering design standards to ascertain whether any deficiencies are apparent in the site
6 access plans which would be considered significant. The determination of significance
7 shall be on a case-by-case basis.

8 **TRANS – 4: Would the project result in inadequate emergency access?**

9 The LADOT Transportation Assessment Guidelines do not provide guidance for the
10 assessment of inadequate emergency access; however, this analysis includes a
11 determination based on any potential modifications to baseline emergency access to the
12 Project site.

13 **3.10.4.5 Impact Determination**

14 **Proposed Project**

15 **Impact TRANS-1: Would the Project conflict with a program, plan,
16 ordinance or policy addressing the circulation system, including
17 transit, roadway, bicycle and pedestrian facilities?**

18 The Project does not require a discretionary action by the Board of Harbor
19 Commissioners that requires them to find that the project would substantially conform to
20 the purpose, intent and provisions of the General Plan. The Project does not change the
21 type of existing land use and therefore does not require conformity with the General Plan.

22 In addition, the Proposed Project would not alter existing transportation routes or
23 transportation options, nor would it alter access to public safety. Direct landside access to
24 the Project site is provided via the West Basin Container Terminal driveway from Knoll
25 Drive which is connected to John S. Gibson Boulevard across the Pacific Harbor Line
26 (PHL) train tracks via a short roadway that makes the intersection of John S. Gibson
27 Boulevard and the I-110 Northbound ramps. The Proposed Project would not require any
28 modifications or closures to the public right-of-way. There would be no in-street
29 construction activities. Therefore, the Proposed Project would not directly conflict with a
30 transportation plan, policy, or program adopted to support multimodal transportation
31 options or public safety.

32 The Project is consistent with the Southern California Association of Governments
33 (SCAG) Regional Transportation Plan/Sustainable Communities strategy, which states
34 “SCAG supports a world-class, coordinated Southern California goods movement system
35 that accommodates growth in the throughput of freight to the region and nation in ways
36 that support the region’s economic vitality, attainment of clean air standards, and quality
37 of life for our communities.” (SCAG 2020).

- 38 • Is the project required to or proposing to make any voluntary modifications to the
39 public right-of-way (e.g., dedications and/or improvements in the right-of-way,
40 reconfigurations of curb line)?

41 The Proposed Project does not include any modifications to existing roadways that
42 support current or future bike lanes or bus stops and is not required to make any
43 voluntary or required modifications to the public right-of-way. The Proposed Project does

1 not propose to include dedications or physical modifications to the public right-of-way,
2 nor is it required.

3 **Project Construction Screening Criteria**

- 4 • Would the project require construction activities to take place within the right-of-
5 way of a Boulevard or Avenue (as designated in the Mobility Plan 2035) which
6 would necessitate temporary lane, alley, or street closures for more than one day
7 (including day and evening hours, and overnight closures if on a residential
8 street)? **No, the Project would not require construction activities to take**
9 **place within the right-of-way of a Boulevard or Avenue.**
- 10 • Would the project require construction activities to take place within the right-of-
11 way of a Collector or Local Street (as designated in the Mobility Plan 2035)
12 which would necessitate temporary lane, alley, or street closures for more than
13 seven days (including day and evening hours, and including overnight closures if
14 on a residential street)? **No, the Project would not require construction**
15 **activities to take place within the right-of-way of a Collector or Local Street.**
- 16 • Would in-street construction activities result in the loss of regular vehicle,
17 bicycle, or pedestrian access, including loss of bicycle parking to an existing land
18 use for more than one day, including day and evening hours and overnight
19 closures if access is lost to residential units? **No, the Project would not include**
20 **in-street construction activities.**
- 21 • Would in-street construction activities result in the loss of regular ADA
22 pedestrian access to an existing transit station, stop, or facility (e.g., layover
23 zone) during revenue hours? **No, the Project would not include in-street**
24 **construction activities.**
- 25 • Would in-street construction activities result in the temporary loss for more than
26 one day of an existing bus stop or rerouting of a bus route that serves the project
27 site? **No, the Project construction activities would not result in the**
28 **temporary loss of an existing bus stop or rerouting of a bus route.**
- 29 • Would construction activities result in the temporary removal and/or loss of on-
30 street metered parking for more than 30 days? **No, the Project construction**
31 **activities would not result in the temporary loss of on-street metered**
32 **parking.**
- 33 • Would the project involve a discretionary action to construct new buildings or
34 additions of more than 1,000 square feet that require access for hauling
35 construction materials and equipment from streets less than 24- feet wide in a
36 hillside area? **No, the Project construction activities would not require access**
37 **for hauling construction materials from streets less than 24-feet wide in a**
38 **hillside area.**

39 Responses to all of the screening criteria questions are “no.” Accordingly, the Proposed
40 Project does not require further analysis for this criterion and does not conflict with a
41 program, plan, ordinance, or policy addressing the circulation system, including transit,
42 roadway, bicycle and pedestrian facilities.

43 **CEQA Impact Determination**

44 Because the Proposed Project would not conflict with an established program, plan,
45 ordinance or policy addressing the circulation system, including transit, roadway, bicycle

1 and pedestrian facilities, there would be no impacts associated with the Project
2 construction or operations.

3 ***Mitigation Measures***

4 No mitigation is required.

5 ***Residual Impacts***

6 There would be no impacts.

7 **NEPA Impact Determination**

8 Because the Proposed Project would not conflict with an established program, plan,
9 ordinance or policy addressing the circulation system, including transit, roadway, bicycle
10 and pedestrian facilities, there would be no impacts associated with the Project
11 construction or operations.

12 ***Mitigation Measures***

13 No mitigation is required.

14 ***Residual Impacts***

15 There would be no impacts.

16 **Impact TRANS-2: Would the Project conflict or be inconsistent with**
17 **CEQA Guidelines section 15064.3, subdivision (b)?**

18 CEQA Guidelines Section 15064.3 subdivision (b), provides criteria for analyzing
19 transportation impacts. The guidelines state that a significant impact may occur if vehicle
20 miles traveled (VMT) exceed an applicable threshold of significance. The section defines
21 "vehicle miles traveled" as the amount and distance of automobile travel attributable to a
22 project (e.g. employee travel), which does not include VMT related to commercial or
23 heavy-duty drayage trucks in the transportation analysis per OPR guidance. However, the
24 impact of these vehicles is analyzed in other resource areas, such as Air Quality,
25 Greenhouse Gas Emissions, Noise, and Energy.

26 Since the Proposed Project would generate 250 or more daily automobile vehicle trips it
27 would not be screened from VMT analysis based on the 2022 LADOT Transportation
28 Assessment Guidelines (see Appendix C2).

29 The Project would have a potential impact if the Project would generate work VMT per
30 employee exceeding 15 percent below the existing average work VMT per employee for
31 the Area Planning Commission (APC) in which the project is located. The project is
32 located in the Harbor APC, which has a daily work per employee threshold of 12.3 VMT.

33 Per the LADOT Transportation Assessment Guidelines methodology, daily vehicle trips,
34 daily VMT, and daily work VMT per employee for office projects should be estimated
35 using the VMT Calculator tool (LADOT 2022). That tool is specifically designed and
36 intended to be used to develop project specific daily household VMT per capita and daily
37 work VMT per employee metrics for residential and office land use development projects
38 in the City of Los Angeles. It implements the methodologies, screening criteria, and
39 impact significance thresholds described in Section 2.2 of LADOT's Transportation
40 Assessment Guidelines for residential and employment projects.

41 Custom land use of a "Port Terminal" was entered into the VMT Calculator which added
42 560 new employees, the incremental change from the CEQA Baseline value of 182 to the
43 2046 Project value of 742. The calculator returned a value of Proposed Project daily

1 Work VMT per employee of 9.1 VMT. Since this value is below the threshold of 15
2 percent below the APC daily work VMT per employee of 12.3 VMT (i.e. less than 10.5
3 VMT), the Proposed Project would not have a significant impact under CEQA Guidelines
4 section 15064.3, subdivision (b). It is noted the VMT calculator values were similar to
5 the VMT output from the PortTAM travel demand model: 10.1 average daily Auto VMT
6 from the PortTAM model and 9.1 average daily auto VMT from the LADOT VMT
7 Calculator. Each model has slightly different parameters which result in slightly different
8 outputs; however, these values are consistent in the demonstration of less than significant
9 impacts of the Proposed Project CEQA Guidelines section 15064.3, subdivision (b).

10 **CEQA Impact Determination**

11 Because the Proposed Project daily VMT per employee is lower than the threshold for the
12 Harbor APC as prescribed in the LADOT Transportation Assessment Guidelines, the
13 impacts of the Proposed Project would be less than significant.

14 ***Mitigation Measures***

15 No mitigation is required.

16 ***Residual Impacts***

17 Impacts would be less than significant.

18 **NEPA Impact Determination**

19 Because the Proposed Project daily VMT per employee is lower than the threshold for the
20 Harbor APC as prescribed in the LADOT Transportation Assessment Guidelines, the
21 impacts of the Proposed Project would be less than significant.

22 ***Mitigation Measures***

23 No mitigation is required.

24 ***Residual Impacts***

25 Impacts would be less than significant.

26 **Impact TRANS-3: Would the project substantially increase hazards 27 due to a geometric design feature (e.g., sharp curves or dangerous 28 intersections) or incompatible uses (e.g., farm equipment)?**

29 The Proposed Project does not include new driveways or new vehicle access to the
30 property from the public right-of-way. Also, the Proposed Project does not include
31 features that would alter roadway geometry.

32 **CEQA Impact Determination**

33 Because the Proposed Project would not cause changes to Project site driveways or
34 public rights-of-way relative to the CEQA baseline, there would be no impacts.

35 ***Mitigation Measures***

36 No mitigation is required.

37 ***Residual Impacts***

38 There would be no impacts.

1 **NEPA Impact Determination**

2 Because the Proposed Project would not cause changes to Project site driveways or
3 public rights-of-way relative to the NEPA baseline, there would be no impacts.

4 ***Mitigation Measures***

5 No mitigation is required.

6 ***Residual Impacts***

7 There would be no impacts.

8 **Impact TRANS-4: Would the project result in inadequate emergency
9 access?**

10 The Proposed Project would not alter or close existing roadways or emergency access
11 points.

12 **CEQA Impact Determination**

13 Because the Proposed Project would not cause changes in emergency access relative to
14 the CEQA baseline, there would be no impacts.

15 ***Mitigation Measures***

16 No mitigation is required.

17 ***Residual Impacts***

18 There would be no impacts.

19 **NEPA Impact Determination**

20 Because the Proposed Project would not cause changes in emergency access relative to
21 the NEPA baseline, there would be no impacts.

22 ***Mitigation Measures***

23 No mitigation is required.

24 ***Residual Impacts***

25 There would be no impacts.

26 **Alternative 1 – No Project**

27 **Impact TRANS-1: Would the No Project Alternative conflict with a
28 program, plan, ordinance or policy addressing the circulation
29 system, including transit, roadway, bicycle and pedestrian facilities?**

30 The No Project Alternative does not require a discretionary action by the Board of Harbor
31 Commissioners that requires them to find that it would substantially conform to the
32 purpose, intent and provisions of the General Plan. Alternative 1 does not change the type
33 of existing land use and therefore does not require conformity with the General Plan.

34 In addition, the No Project Alternative would not alter existing transportation routes or
35 transportation options, it would not alter access to public safety or require any
36 modifications or closures to the public right-of-way. There would be no in-street
37 construction activities. Therefore, the No Project Alternative would not directly conflict
38 with a transportation plan, policy, or program adopted to support multimodal
39 transportation options or public safety.

1 The No Project Alternative would not include any modifications to existing roadways
2 that support current or future bike lanes or bus stops and would not be required to make
3 any voluntary or required modifications to the public right-of-way. As with the Proposed
4 Project, responses to all of the screening criteria questions are “no.” Accordingly, the No
5 Project Alternative does not require further analysis for this criterion and does not
6 conflict with a program, plan, ordinance, or policy addressing the circulation system,
7 including transit, roadway, bicycle and pedestrian facilities.

8 **CEQA Impact Determination**

9 Because the No Project Alternative would not conflict with an established program, plan,
10 ordinance or policy addressing the circulation system, including transit, roadway, bicycle
11 and pedestrian facilities, it would have no impacts.

12 ***Mitigation Measures***

13 No mitigation is required.

14 ***Residual Impacts***

15 There would be no impacts.

16 **NEPA Impact Determination**

17 The No Project Alternative is not analyzed under NEPA.

18 ***Mitigation Measures***

19 Not applicable.

20 ***Residual Impacts***

21 Not applicable.

22 **Impact TRANS-2: Would the No Project Alternative conflict or be** 23 **inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

24 The No Project alternative would generate fewer daily automobile vehicle trips above the
25 baseline than the Proposed Project, and the daily Work VMT per employee would be
26 below the threshold of 15 percent below the APC daily work VMT per employee.
27 Accordingly, Alternative 1 would be consistent with CEQA Guidelines section 15064.3.

28 **CEQA Impact Determination**

29 Because Alternative 1 would be consistent with CEQA Guidelines section 15064.3,
30 impacts would be less than significant.

31 ***Mitigation Measures***

32 No mitigation is required.

33 ***Residual Impacts***

34 Impacts would be less than significant.

35 **NEPA Impact Determination**

36 The No Project Alternative is not analyzed under NEPA.

37 ***Mitigation Measures***

38 Not applicable.

1 **Residual Impacts**

2 Not applicable.

3 **Impact TRANS-3: Would the No Project Alternative substantially**
4 **increase hazards due to a geometric design feature (e.g., sharp**
5 **curves or dangerous intersections) or incompatible uses (e.g., farm**
6 **equipment)?**

7 The No Project Alternative would not include any changes to roadway geometry or to the
8 public right-of-way.

9 **CEQA Impact Determination**

10 Because the No Project Alternative would not cause changes to roadway geometry,
11 driveways, or public rights-of-way relative to the CEQA baseline, there would be no
12 impacts.

13 **Mitigation Measures**

14 No mitigation is required.

15 **Residual Impacts**

16 There would be no impacts.

17 **NEPA Impact Determination**

18 The No Project Alternative is not analyzed under NEPA.

19 **Mitigation Measures**

20 Not applicable.

21 **Residual Impacts**

22 Not applicable.

23 **Impact TRANS-4: Would the project result in inadequate emergency**
24 **access?**

25 The No Project Alternative would not alter or close existing roadways or emergency
26 access points.

27 **CEQA Impact Determination**

28 Because the No Project Alternative would not cause changes in emergency access, there
29 would be no impacts.

30 **Mitigation Measures**

31 No mitigation is required.

32 **Residual Impacts**

33 There would be no impacts.

34 **NEPA Impact Determination**

35 The No Project Alternative is not analyzed under NEPA.

1 **Mitigation Measures**

2 Not applicable.

3 **Residual Impacts**

4 Not applicable.

5 **Alternative 2 – No Federal Action**

6 **Impact TRANS-1: Would the No Federal Action Alternative conflict**
7 **with a program, plan, ordinance or policy addressing the circulation**
8 **system, including transit, roadway, bicycle and pedestrian facilities?**

9 The No Federal Action Alternative does not require a discretionary action by the Board
10 of Harbor Commissioners that requires them to find that it would substantially conform
11 to the General Plan. Alternative 2 would not change the type of existing land use and
12 therefore does not require conformity with the General Plan.

13 In addition, the No Federal Action Alternative would not alter existing transportation
14 routes or transportation options; it would not alter access to public safety or require any
15 modifications or closures to the public right-of-way. There would be no in-street
16 construction activities. Therefore, the No Project Alternative would not directly conflict
17 with a transportation plan, policy, or program adopted to support multimodal
18 transportation options or public safety.

19 The No Federal Action Alternative would not include any modifications to existing
20 roadways that support current or future bike lanes or bus stops and would not be required
21 to make any voluntary or required modifications to the public right-of-way. As with the
22 Proposed Project, responses to all of the screening criteria questions are “no.”
23 Accordingly, the No Project Alternative does not require further analysis for this criterion
24 and does not conflict with a program, plan, ordinance, or policy addressing the circulation
25 system, including transit, roadway, bicycle and pedestrian facilities.

26 **CEQA Impact Determination**

27 Because the No Federal Action Alternative would not conflict with an established
28 program, plan, ordinance or policy addressing the circulation system, including transit,
29 roadway, bicycle and pedestrian facilities, it would have no impacts.

30 **Mitigation Measures**

31 No mitigation is required.

32 **Residual Impacts**

33 There would be no impacts.

34 **NEPA Impact Determination**

35 Because the No Federal Action Alternative is identical to the NEPA baseline, there would
36 be no impacts,

37 **Mitigation Measures**

38 No mitigation is required

39 **Residual Impacts**

40 There would be no impacts.

1 **Impact TRANS-2: Would the No Federal Action Alternative conflict or**
2 **be inconsistent with CEQA Guidelines section 15064.3, subdivision**
3 **(b)?**

4 The No Federal Action Alternative would generate fewer daily automobile vehicle trips
5 above the baseline than the Proposed Project, and the daily Work VMT per employee
6 would be below the threshold of 15 percent below the APC daily work VMT per
7 employee. Accordingly, Alternative 1 would be consistent with CEQA Guidelines section
8 15064.3.

9 **CEQA Impact Determination**

10 Because Alternative 2 would be consistent with CEQA Guidelines section 15064.3,
11 impacts would be less than significant.

12 ***Mitigation Measures***

13 No mitigation is required.

14 ***Residual Impacts***

15 Impacts would be less than significant.

16 **NEPA Impact Determination**

17 Because the No Federal Action Alternative is identical to the NEPA baseline, there would
18 be no impacts,

19 ***Mitigation Measures***

20 No mitigation is required

21 ***Residual Impacts***

22 There would be no impacts.

23 **Impact TRANS-3: Would the No Federal Action Alternative**
24 **substantially increase hazards due to a geometric design feature**
25 **(e.g., sharp curves or dangerous intersections) or incompatible uses**
26 **(e.g., farm equipment)?**

27 The No Federal Action Alternative would not include any changes to roadway geometry
28 or to the public right-of-way.

29 **CEQA Impact Determination**

30 Because the No Federal Action Alternative would not cause changes to roadway
31 geometry, driveways, or public rights-of-way relative to the CEQA baseline, there would
32 be no impacts.

33 ***Mitigation Measures***

34 No mitigation is required.

35 ***Residual Impacts***

36 There would be no impacts.

NEPA Impact Determination

Because the No Federal Action Alternative is identical to the NEPA baseline, there would be no impacts.

Mitigation Measures

No mitigation is required

Residual Impacts

There would be no impacts.

Impact TRANS-4: Would the project result in inadequate emergency access?

The No Federal Action Alternative would not alter or close existing roadways or emergency access points.

CEQA Impact Determination

Because the No Project Alternative would not cause changes in emergency access, there would be no impacts.

Mitigation Measures

No mitigation is required.

Residual Impacts

There would be no impacts.

NEPA Impact Determination

Because the No Federal Action Alternative is identical to the NEPA baseline, there would be no impacts.

Mitigation Measures

No mitigation is required.

Residual Impacts

There would be no impacts.

3.10.4.6 Summary of Impact Determinations

Table 3.10-4 summarizes the CEQA and NEPA impact determinations of the Proposed Project and alternatives related to Ground Transportation, as described in the detailed discussion above. For each impact threshold, the table describes the impact, notes the CEQA and NEPA impact determinations, describes any applicable mitigation measures, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

3.10.4.7 Mitigation Monitoring

Because the Proposed Project and Alternatives 1 and 2 would not result in significant transportation impacts under CEQA or NEPA, there would be no mitigation measures requiring monitoring.

1 **3.10.5 Significant Unavoidable Impacts**

2 No significant and unavoidable impacts would occur.

Table 3.10-4: Summary Matrix of Potential Impacts and Mitigation Measures for Ground Transportation Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
Proposed Project	TRANS-1: Would the Proposed Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	CEQA: No Impact	No mitigation is required.	No Impact
		NEPA: No Impact	No mitigation is required.	No Impact
	TRANS-2: Would the Proposed Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	CEQA: Less than significant	No mitigation is required.	Less than significant
		NEPA: Less than significant	No mitigation is required.	Less than significant
	TRANS-3: Would the Proposed Project substantially increase hazards due to a geometric design feature or incompatible uses?	CEQA: No Impact	No mitigation is required.	No Impact
		NEPA: No Impact	No mitigation is required.	No Impact
TRANS-4: Would the Proposed Project result in inadequate emergency access?	CEQA: No Impact	No mitigation is required.	No Impact	
	NEPA: No Impact	No mitigation is required.	No Impact	
Alternative 1 – No Project	TRANS-1: Would Alternative 1 conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	CEQA: No Impact	No mitigation is required.	No Impact
		NEPA: N/A		N/A
	TRANS-2: Would Alternative 1 conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	CEQA: Less than significant	No mitigation is required.	Less than significant
		NEPA: N/A		N/A
	CEQA: No Impact	No mitigation is required.	No Impact	

Table 3.10-4: Summary Matrix of Potential Impacts and Mitigation Measures for Ground Transportation Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
	TRANS-3: Would Alternative 1 substantially increase hazards due to a geometric design feature or incompatible uses?	NEPA: N/A		N/A
	TRANS-4: Would Alternative 1 result in inadequate emergency access?	CEQA: No Impact	No mitigation is required.	No Impact
		NEPA: N/A		N/A
Alternative 2 – No Federal Action	TRANS-1: Would Alternative 2 conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	CEQA: No Impact	No mitigation is required.	No Impact
		NEPA: No Impact		No Impact
	TRANS-2: Would Alternative 2 conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	CEQA: Less than significant	No mitigation is required.	Less than significant
		NEPA: No Impact		No Impact
	TRANS-3: Would Alternative 2 substantially increase hazards due to a geometric design feature or incompatible uses?	CEQA: No Impact	No mitigation is required.	No Impact
		NEPA: No Impact		No Impact
	TRANS-4: Would Alternative 2 result in inadequate emergency access?	CEQA: No Impact	No mitigation is required.	No Impact
		NEPA: No Impact		No Impact