4.13 Transportation

This section analyzes the project's potential impacts on transportation. The analysis is primarily based on the One San Pedro Specific Plan Transportation Assessment (Transportation Assessment) prepared by Fehr & Peers, dated April 2023 and included in Appendix I of this Draft EIR/EIS. The Transportation Assessment was prepared pursuant to the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) dated August 2022, which establish the guidelines and methodology for assessing transportation impacts for development projects based on the California Environmental Quality Act (CEQA) Guidelines. The CEQA Guidelines require transportation impacts be evaluated based on vehicle miles traveled (VMT) rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment is being reviewed by LADOT and will be finalized and approved prior to certification of the Final EIR/EIS.

4.13.1 Environmental Setting

a. Existing Street System

Regional Highway System

Regional access to the project site is provided by the Interstate 110 (I-110) State Route 47 (SR 47) with interchanges located approximately 0.80 mile northwest of the project site and 0.50 mile north of the project site, respectively. I-110 runs in a north-south direction and is located north of the project site. At the portion of the freeway closest to the project site I-110 provides four lanes in each direction. The southern terminus of I-110 is at the interchange with Gaffey Street which provides access to the project site. SR 47 runs in an east-west direction and is located north of the project site. At the portion of the freeway closest to the project site, SR 47 provides two lanes in each direction. The western terminus of SR 47 is located at its interchange with I-110. The interchange at Harbor Boulevard provides access to the project site (Appendix I).

Roadways

A description of primary roadways that provide local access to the project site is provided below.

East-West Streets

East-west streets serving the project site include 1st Street, 2nd Street, 3rd Street, 5th Street, Santa Cruz Street, and O'Farrell Street. These streets are described below:

- **1st Street** runs through the OSP Specific Plan Site and is designated as an Avenue II[1] by the City. 1st Street provides two lanes in each direction with parallel parking permitted on both sides of the street. 1st Street is included as part of the Neighborhood Enhanced Network (NEN)[2] in the City's Mobility Plan 2035. West of Mesa Street, 1st Street is also part of the Pedestrian Enhanced Districts (PED)[3].

[1] Avenues which pass through both residential and commercial areas are designated as either Avenue I, Avenue II, or Avenue III by the City.
[2] A NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
[3] PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

- **2nd Street** runs through the OSP Specific Plan Site and is designated as a Local Street[4] by the City. 2nd Street provides one lane in each direction with parallel parking permitted on both sides of the street.
- **3rd Street** runs adjacent to the southern border of the OSP Specific Plan Site and is designated as a Collector[5] by the City. 3rd Street provides one lane in each direction with a center turn lane. Parallel and/or angled parking is permitted on both sides of the street.
- **5th Street** is located approximately 450 feet south of the OSP Specific Plan Site and is designated as an Avenue II by the City. 5th Street provides one lane in each direction with parallel parking permitted on both sides of the street. 5th Street is part of the PED.
- **Santa Cruz Street** runs adjacent to the northern border of the OSP Specific Plan Site and is designated as a Local Street. Santa Cruz Street provides one lane in each direction with parallel parking permitted on both sides of the street.
- **O'Farrell Street** runs approximately 650 feet north of the OSP Specific Plan Site and is adjacent to the northern border of the 327 Harbor Site. O'Farrell Street is a designated Collector and provides one lane in each direction. Parallel parking is permitted on both sides of the street (Appendix I).

North-South Streets

North-south streets serving the project site include Beacon Street, Centre Street, Palos Verdes Street, Mesa Street, Harbor Boulevard, Pacific Avenue, Grand Avenue, and Gaffey Street. These streets are described below:

- **Beacon Street** runs through the southeastern portion of the OSP Specific Plan Site and adjacent to the western portion of the 327 Harbor Site and is designated as a Local Street. Beacon Street provides one lane in each direction with parallel parking permitted on both sides of the street.
- **Centre Street** runs through the OSP Specific Plan Site and is a designated Collector. Centre Street provides one lane in each direction with parallel and/or angled parking permitted on both sides of the street. The portion of Centre Street between 2nd Street and 7th Street is part of the PED in the City's Mobility Plan 2035.
- **Palos Verdes Street** runs through the OSP Specific Plan Site and is designated as a Local Street. Palos Verdes Street provides one lane in each direction with parallel parking permitted on both sides of the street.
- **Mesa Street** runs adjacent to the western border of the OSP Specific Plan Site and is designated as a Local Street. Mesa Street provides one lane in each direction with parallel parking permitted on both sides of the street.
- **Harbor Boulevard** runs adjacent to the eastern border of the OSP Specific Plan Site and the 327 Harbor Site and is designated an Avenue I by the City. North of 3rd Street, Harbor Boulevard provides two lanes in each direction. South of 3rd Street, Harbor Boulevard provides one southbound lane and two northbound lanes. Parking and a bicycle lane are provided in the southbound direction, and a buffered bicycle lane is provided in the northbound direction.
- **Pacific Avenue** is located approximately 650 feet west of the OSP Specific Plan Site and is designated as a Modified Avenue II south of O'Farrell Street and an Avenue II north of O'Farrell Street. Pacific Avenue provides one lane in each direction with a center turn lane and parallel

[4] Local Streets are characterized by the City as streets which are intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
[5] Collector streets are characterized by the City as 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.

parking permitted on both sides of the street. Pacific Avenue is included in the Bicycle Enhanced Network (BEN)[6]. The portion of Pacific Avenue between O'Farrell Street and 2nd Street is included in LADOT's High Injury Network (HIN)[7]. The portion of Pacific Avenue between Oliver Street and 3rd Street is part of the PED in the City's Mobility Plan 2035.

- **Grand Avenue** is located approximately 0.25 mile west of the OSP Specific Plan Site and is designated as a Collector. Grand Avenue provides one lane in each direction with parallel parking permitted on both sides of the street. Grand Avenue is included in the BEN due to its existing Tier 2 bicycle lane. In addition, Grand Avenue is included in the NEN. The portion of Grand Avenue south of O'Farrell Street is included in the LADOT's HIN.
- **Gaffey Street** is located approximately 0.4 mile west of the OSP Specific Plan Site and is designated as a Boulevard II[8] by the City. Gaffey Street provides two to three lanes in each direction. Parallel parking is provided in both directions on some blocks; however, parking is restricted during peak periods to provide an additional travel lane, increasing the number of travel lanes from two to three. Gaffey Street is included in the LADOT's HIN. Gaffey Street is included in the Transit Enhanced Network (TEN)[9] and is part of the PED in the City's Mobility Plan 2035 (Appendix I).

b. Public Transit Service

The project site is served by several local and regional bus lines. The Metro Local (Route 205) operates on the intersection of 1st Street and Harbor Boulevard, running through and adjacent to the project site. The Metro Bus Rapid Transit (BRT; 910/950) runs through the project site on 1st Street and adjacent to the project site on Beacon Street. LADOT DASH San Pedro line also traverses the project site on 1st Street and Centre Street. The Metro Express (Route 550) and Metro Local (Route 246) bus lines also operate within 0.5 mile of the project site on Gaffey Street and Pacific Avenue. The LADOT Commuter Express (CE) 142 and Palos Verdes Peninsula Transit Authority (PVPTA) Line 225-226 operate on 7th Street approximately 0.25 mile south of the OSP Specific Plan Site. Descriptions of the transit lines identified are provided below:

- **Metro Line 205** provides local service between San Pedro and the Willowbrook community in unincorporated Los Angeles County. This line runs along 1st Street, Harbor Boulevard, and 7th Street. Line 205 has average headways of 30 minutes during the weekday morning and afternoon peak periods. Line 205 has one stop in the eastbound direction near the OSP Specific Plan Site at 1st Street and Pacific Avenue, one in the southbound direction at Harbor Boulevard and 1st Street, directly adjacent to the OSP Specific Plan Site, and one in the westbound direction at 1st Street and Harbor Boulevard, within the OSP Specific Plan Site. The southbound stop includes two bus benches, and the westbound stop has one bench.
- **Metro Line 246** provides service between San Pedro and the Harbor Gateway Transit Center. This line runs west of the project site along Pacific Avenue. Line 246 has average headways of 30 minutes during the weekday morning and afternoon peak periods. Line 246 has two stops in the southbound direction at Pacific Avenue and 1st Street and Pacific Avenue and 3rd Street, and two

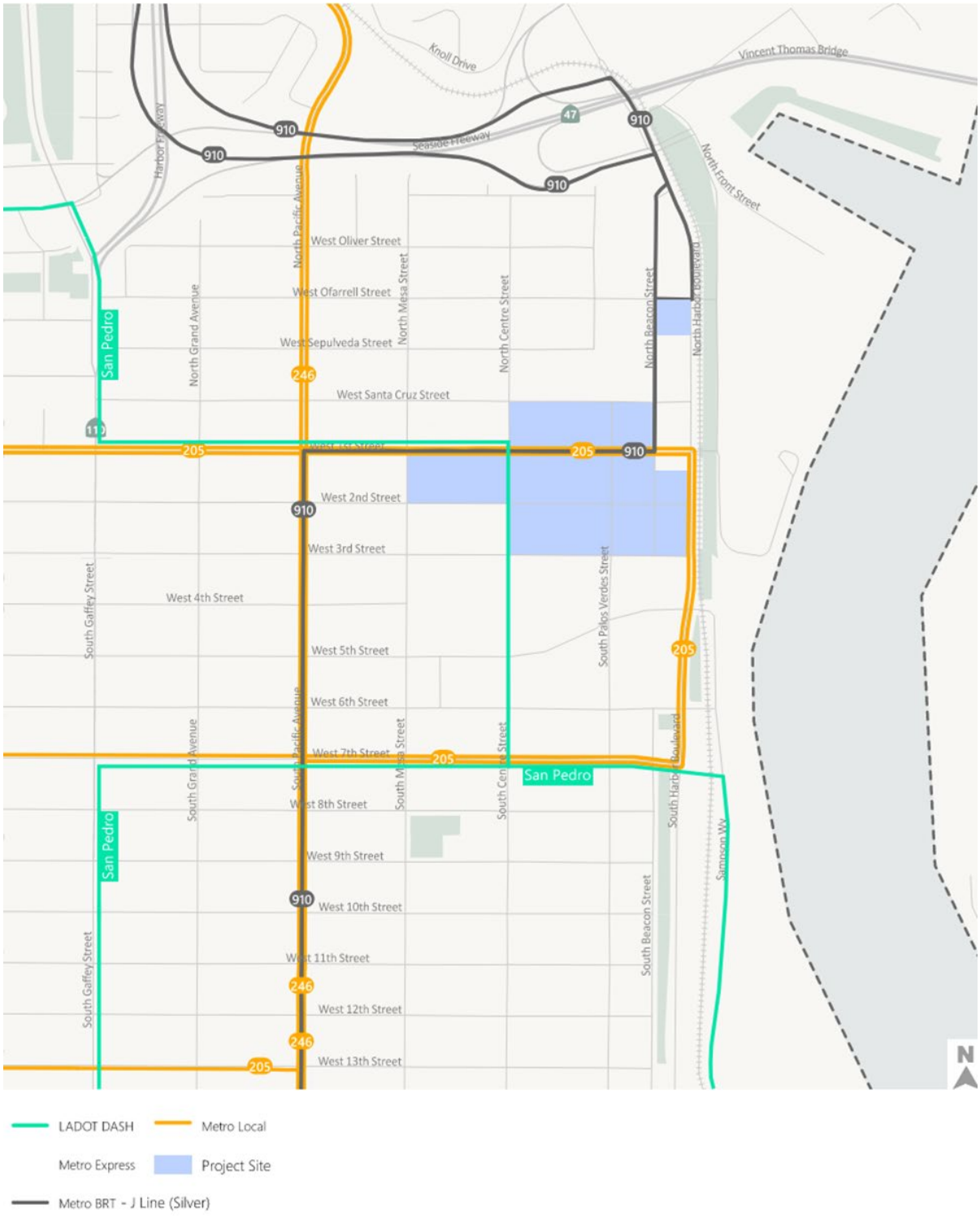
[6] The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation.
[7] The HIN are roads which collectively represent six percent of the City's street miles but accounts for approximately two thirds of all fatalities and serious injury collisions involving people walking and biking.
[8] The City characterizes Boulevards as the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
[9] The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.

in the northbound direction at the same two intersections. Both stops at 3rd Street include bus shelters, and both stops at 1st Street contain bus benches. All four stops include trash bins.

- **Metro BRT 950** (J Line) provides rapid transit service between San Pedro and El Monte via Downtown Los Angeles. The line runs through the OSP Specific Plan Site and adjacent to the 327 Harbor Site along Beacon Street, as well as through 1st Street and Pacific Avenue. The J Line has average headways of 35 minutes through San Pedro during peak periods. It has one bus stop in each direction at the intersections of 1st Street and Beacon Street, Pacific Avenue and 1st Street, and Pacific Avenue and 3rd Street. There is also a northbound stop immediately adjacent to the 327 Harbor Site at O'Farrell Street and Beacon Street and a southbound stop on Beacon Street approximately 300 feet north of the 327 Harbor Site. The stops at the intersection of 1st Street and Beacon Street do not contain any amenities. The stops at the intersection of Pacific Avenue and 1st Street contain benches. The stops at the intersection of Pacific Avenue and 3rd Street contain a shelter, bench, and trashcan. The southbound stop on Beacon Street near O'Farrell contains benches, a shelter, and trashcans. The northbound stop adjacent to the 327 Harbor Site does not contain any amenities.
- **LADOT DASH San Pedro** provides circulator service in the San Pedro neighborhood. There are several stops near or within the OSP Specific Plan Site on 1st Street and Centre Street. DASH San Pedro has headways of 30 minutes during the weekday morning and afternoon peak periods. The northbound/eastbound DASH has stops at the intersections of Centre Street and 3rd Street, Centre Street and 1st Street, and 1st Street and Mesa Street. The westbound/southbound DASH has stops at the same three intersections. None of the stops contain any amenities.
- **LADOT CE 142** provides service between San Pedro and Long Beach. The closest stops to the project site are at 7th Street and Palos Verdes Street and at 7th Street and Mesa Street in both the eastbound and westbound directions. The CE 142 has headways of 30 minutes during the weekday morning and afternoon peak periods. The eastbound stop at Palos Verdes Street includes a shelter and the westbound stop contains no amenities. The stops in both directions at Mesa Street contain at least one bench and a trash bin.
- **PVPTA Lines 225 and 226** provide service between San Pedro and the Palos Verdes Peninsula. There is one northbound and one southbound stop, both on 7th Street at Pacific Avenue. The 225/226 has headways of 55-60 minutes during the weekday morning and afternoon peak periods. The westbound stop contains a shelter, and the eastbound stop contains a bench. Both stops include trash bins (Appendix I).

The bus lines serving the project site are illustrated in Figure 4.13-1.

Figure 4.13-1 Public Transit



c. Bicycle and Pedestrian Facilities

Class II[10] bicycle lanes are provided in both directions along Harbor Boulevard, Pacific Avenue, and Grand Avenue. The northbound bicycle lane on Harbor Boulevard is buffered. Sidewalks are present along both sides of all streets within and adjacent to the OSP Specific Plan Site and 327 Harbor Site. LADOT has identified a network of streets, called the HIN, which has a higher incidence of severe and fatal collisions. The HIN puts an emphasis on pedestrians and cyclists. No portions of streets immediately adjacent to the project site are within the HIN. As discussed above, points of Pacific Avenue, Grand Avenue, and Gaffey Street are included in the HIN (Appendix I).

4.13.2 Regulatory Setting

a. Federal Laws and Regulations

Americans with Disabilities Act of 1990

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

b. State Laws and Regulations

Complete Streets Act

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

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

Assembly Bill 32 and Senate Bill 375

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

[10] Class II bicycle lanes are a portion of the road which is designated by pavement striping for exclusive bicycle use.

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

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

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

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

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a major transit stop as defined by Public Resources Code Section 21064.3. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

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

California Vehicle Code

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

Senate Bill 743

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

appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines, and the updated Guidelines became effective on December 28, 2018.

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

CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, Determining the Significance of Transportation Impacts. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop[11] or a stop along an existing high quality transit corridor[12] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

c. Regional and Local Laws and Regulations

Southern California Association of Governments 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a long-range visioning plan that

[11] "Major transit stop" is defined in Public Resources Code Section (PRC) 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
[12] "High-quality transit corridors" are defined in (PRC)Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

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

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

City of Los Angeles Mobility Plan 2035

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

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

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

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

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

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the BEN, TEN, Vehicle Enhanced Network (VEN), and NEN. In addition to these networks, many areas that could benefit from additional pedestrian features are identified as PED. These networks and PED are defined as follows:

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.
- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.
- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

San Pedro Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The

community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plan texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plan maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The project site is located within the San Pedro Community Plan area. The following San Pedro Community Plan transportation and circulation goals and policies are applicable to the proposed project:

- **Policy LU1.6 Alleys:** Maintain and improve existing neighborhood alleys as an alternative, safe, well maintained vehicular access to homes that reduces curb cuts, driveways, and associated pedestrian-automobile conflicts along sidewalks.
- **Policy LU5.16 Minimize parking impacts:** Reduce the visual prominence of parking within the public realm by requiring off-street parking to be located behind or within structures or otherwise fully or partially screened from public view.

- **Goal M1:** A diverse system of streets that balances the needs of pedestrians, bicyclists, transit users, mobility-challenged persons and vehicles while providing sufficient mobility and abundant access options for the existing and future users of the street system.
  - **Policy M1.1 Complete Streets:** Ensure the community is served by a complete street system with some streets strategically prioritized for target users and other streets that connect the complement of arterials together to serve all users.
  - **Policy M1.2 Mobility for Challenged Users:** Support wherever feasible, transportation programs and services aimed at enhancing the mobility of young people, senior citizens, disabled persons and other populations dependent on transit.
  - **Policy M1.3 Mobility Enhancements:** Developments that increase density or intensity by zone change, variance, conditional use, parcel map, subdivision or other discretionary action should provide adequate mobility enhancements such as traffic mitigation, pedestrian crosswalks, bike lanes and enhanced bus stops to ensure that mobility needs are met.
  - **Policy M1.4 Private investment for off-site facilities/amenities:** Encourage new developments to include bicycle and pedestrian amenities and include off-site transit and road improvements creating a circulation system that optimizes travel by all modes.

- **Goal M2:** A circulation system that supports successful neighborhood areas with multi-modal access, streets that accommodate public open space and gathering places, and streets that enhance sustainable watershed management.
  - **Policy M2.1 Streetscapes:** Encourage and support streetscape improvements in neighborhood areas that foster the appeal of the street as a gathering place including street furniture, well-maintained street trees, publicly accessible courtyards, wide sidewalks, bicycle access and appropriate traffic control measures to maintain safe travel speeds.

- **Goal M3:** A pleasant street environment throughout San Pedro that is universally accessible, safe, and convenient for pedestrians.
  - **Policy M3.2 Priority Pedestrian Routes:** Selected streets within commercial, mixed-use and employment districts should have pedestrian priority establishing pedestrian needs as paramount to vehicular circulation needs and encouraging investment in pedestrian improvements and programs for these segments.

- **Policy M3.3 Pedestrian Amenities:** Maintain sidewalks, streets and right-of-way in good condition, free of obstructions, and with adequate lighting, trees and parkways. Streets should accommodate pedestrians comfortably through adequate sidewalks and parkway landscaping that provides a buffer from moving vehicles, shade from the hot sun, and street lighting that provides for safety during the night.
- **Policy M3.4 Minimize pedestrian conflicts:** Minimize conflicts between buses, cars, and pedestrians by designing and constructing sidewalks and crosswalks that make pedestrians feel safe and creating well-marked crossings at intersections and mid-block locations.
- **Policy M3.5 Safe school routes:** Encourage the development and improvement of safe routes to schools throughout the community via walking, bicycles or transit.

- **Goal M4:** A safe, comprehensive, and integrated bikeway network that is accessible to all, and encourages bicycling for recreation and transportation.
  - **Policy M4.1 Priority bikeways:** Support the Citywide bikeway network to establish bicycle circulation as paramount to vehicular circulation needs on selected streets and to encourage investment in bicycle improvements and programs on these identified streets.
  - **Policy M4.2 Bikeway connections:** Provide bicycle access for open space areas, commercial corridors, Downtown/Regional Center, Neighborhood Districts and Community Centers to allow easy connection between residential neighborhoods and employment centers, as well as important non-work destinations, including schools and recreational facilities.
  - **Policy M4.4 Regional coordination:** Coordinate with adjacent jurisdictions and communities to ensure that local bicycle facilities be linked with those of neighboring areas.

- **Goal M6:** An expanded public transit system that provides residents, employees, and visitors safe and efficient access to jobs, services, recreation and other community assets so that automobile dependence can be reduced.
  - **Policy M6.2 Pedestrian access to transit:** Improve pedestrian amenities and urban design on streets served by transit to create welcoming conditions for pedestrians accessing transit.

- **Goal M7:** A network of streets and freeways that supports existing and planned land uses, and provides improved motorized vehicle mobility throughout San Pedro, particularly on congested corridors.
  - **Policy M7.3 Access management:** Minimize driveways and consider the addition of medians on Arterials to ensure the smooth and safe flow of vehicles, buses, pedestrians and bicycles.
  - **Policy M7.5 Emergency access:** Develop, improve, and maintain streets that are easily accessible to emergency vehicles, and during emergency situations, such as sink holes, landslides, and other such type of events that may arise.

- **Goal M8:** Residential neighborhoods that are protected from the intrusion of cut-through traffic, with emphasis on safety and quality of life.
  - **Policy M8.1 Traffic calming:** Support traffic calming measures and parking management for local and collector streets where a demonstrated need exists and with active community involvement.
  - **Policy M8.2 Traffic mitigations for development:** Require major developments to mitigate traffic impacts on residential neighborhoods.

- **Goal M9:** Improved air quality and health of residents as a result of decreased single-occupant automobile demand and reduced vehicle miles traveled.
  - **Policy M9.1 Regional coordination:** Coordinate with Councils of Government and regional transportation planning agencies (such as SCAG and Metro) and adjacent cities to improve shuttle services, encourage ridesharing, bicycle sharing, and other TDM programs within the region.
  - **Policy M9.2 Reduce auto trips:** Create incentives for employers, institutions, and residential neighborhoods to reduce their vehicle trips by encouraging mixed-use developments that minimize VMT.
  - **Policy M9.3 Alternatives to the automobile:** Reduce automobile dependency by providing a safe, convenient transit system, pedestrian linkages and a network of safe and accessible bikeways and encouraging alternatives, including reduced emission vehicles, such as electric and neighborhood electric vehicles (NEVs).
  - **Policy M9.4 Transportation Demand Management (TDM) Plans:** Encourage major development projects to submit a TDM Plan to the City and provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, telecommuting, bicycling, and walking, etc.).
  - **Policy M9.5 Transportation Management Associations:** Support the formation of agencies and collaboratives such as Transportation Management Associations (TMAs) that facilitate ridesharing in carpools and vanpools.

- **Goal M11:** Improved air quality and health of residents as a result of decreased single-occupant automobile demand and reduced vehicle miles traveled.
  - **Policy M11.3 Convert surface lots to structures:** Support the development of City-owned or other surface parking lots into parking structures where appropriate.

- **Goal M12:** Parking policies and requirements that capture the true cost of private vehicle use and support livable neighborhoods, environmental/ energy sustainability, and the use of alternative modes of transportation.
  - **Policy M12.3 Priority parking for alternative fuel vehicles:** Encourage new commercial and retail developments to provide prioritized parking for shared vehicles, electric vehicles and vehicles using alternative fuels.
  - **Policy M12.4 Connections for electric vehicles:** Encourage new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles (ZEVs) and/or plug-in electric hybrids (PHEV).

Los Angeles Municipal Code

With regard to construction traffic, Los Angeles Municipal Code (LAMC) Section 41.40 limits construction activities to the hours from 7:00 a.m. to 9:00 p.m. on weekdays and from 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays. No construction is permitted on Sundays. LAMC Section 62.61 prohibits construction within the public right-of-way during peak hours (defined as 6:00 a.m. to 9:00 a.m. and 3:30 p.m. to 7:00 p.m.), unless a Traffic Management Plan and exemption are approved by the Department of Public Works.

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued therefore, on any R3 or

less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

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

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

LADOT Transportation Assessment Guidelines

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on VMT, pursuant to CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in August 2022. The CEQA thresholds provide the methodology for analyzing the CEQA Guidelines Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies (LADOT 2022).

LADOT Manual of Policies and Procedures Section 321

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

Vision Zero

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

Interim Guidance for Freeway Safety

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

Citywide Design Guidelines

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

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues (City of Los Angeles 2021). The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

4.13.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

In accordance with Appendix G of the CEQA Guidelines, a project would result in a significant impact to transportation if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);

3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or
4. Result in inadequate emergency access.

For this analysis, the CEQA Guidelines Appendix G thresholds listed above are relied upon. The analysis also utilizes factors and considerations identified in the LADOT's TAG, as appropriate, to assist in answering the Appendix G threshold questions. The significance criteria identified by the TAG are discussed below.

Programs, Plans, and Policies

The TAG specifies that the Mobility Plan 2035 and other relevant City plans and policies, including new and revised plans that may be adopted over time, should be consulted to identify potential conflicts with projects and plans in the CEQA review process. The TAG Attachment D provides a worksheet with a structured approach to determine whether a project conflicts with a program, plan, ordinance, or policy addressing the circulation system. The intention of Attachment D is to streamline review by highlighting the most relevant plans, policies, and programs when assessing potential impacts to the city's circulation system (LADOT 2022).

VMT

The TAG identifies thresholds for potentially significant VMT impacts for development projects. The TAG states a development project will have a potentially significant impact if one or more of the following occurs:

- For residential projects, a development project may have a potential significant impact if it generates household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. The project site is within the Harbor APC which has a daily household VMT per capita of 9.2 and a daily work VMT per employee of 12.3. This criterion was used for the residential component of the proposed project.
- For office projects, a development project may have a potential significant impact if it generates work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located. The proposed project does not have an office component.
- Local-serving retail development tends to shorten trips and reduce VMT, whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT. Local-serving is defined as retail uses less than 50,000 sf, or if most of the vehicles are expected to be originating from the project area. Local-serving retail uses are considered to have less than significant VMT impacts. All of the retail uses in the proposed project are expected to be local-serving, either for residents of the proposed project or the surrounding neighborhood, so most of the vehicles would originate from the project area.
- For mixed-use projects, a development project may have a potential significant impact if it exceeds the impact criteria for any one of the project's land uses, after taking credit for internal capture. The proposed project is mixed use and has both residential and local-serving retail components.

In addition, the TAG states a project could have a cumulatively considerable impact on VMT if the project has both a significant project-level impact, as determined above, and is inconsistent with the SCAG RTP/SCS (Appendix I).

Geometric Design Features or Incompatible Use Hazards

The TAG states preliminary project access plans are to be reviewed for compliance with accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered potentially significant. In addition, the TAG states that project impacts to freeway safety are to be reviewed if a proposed project would generate 25 or more trips in either the morning or afternoon peak hour to nearby freeway off-ramps.

Methodology

The evaluation of potential transportation impacts is based on the Transportation Assessment prepared by Fehr & Peers included in Appendix I of this Draft EIR/EIS. The Transportation Assessment was prepared pursuant to LADOT's TAG dated August 2022, which establishes the guidelines and methodology for assessing transportation impacts for development projects based on the CEQA Guidelines. The Transportation Assessment is under review by LADOT. The following summarizes the methodology utilized in the Transportation Assessment.

Consistency with Plans, Programs, Ordinances, and Policies

As discussed in the Transportation Assessment, a project would not be shown to result in an impact merely based on whether a project would not implement an adopted plan, program, ordinance or policy. Rather, it is the intention of the threshold to ensure that the proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies (LADOT 2022). Furthermore, under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

VMT

The household VMT per capita was estimated using the City's VMT Calculator tool for the proposed land uses. The VMT Calculator starts with Institute of Transportation Engineers (ITE, 9th Edition) trip generation rates[13], implements the MXD (mixed-use) methodology from the U.S. Environmental Protection Agency, and utilizes socioeconomic, transit, and trip length data from the Los Angeles citywide travel demand model (calibrated to Los Angeles conditions) to adjust the trips for internalization, transit, and walkability. The VMT Calculator was calibrated based on local count data collected in the city. The VMT Calculator allows for the selection of a wide variety of potential land uses. The Neighborhood Serving Uses and retail components of the proposed project are considered local-serving and would not have a significant VMT impact. Therefore, VMT associated with these components of the proposed project were not calculated.

[13] The LA VMT Calculator was under development prior to release of the 10th Edition of ITE's trip generation manual in late 2017. The VMT Calculator was validated to LA conditions based on the empirical counts conducted at market rate residential, affordable housing, office, and mixed-use sites in the City, regardless of the source of the rates used as a starting point.

Additionally, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures. The following TDM strategies included in the proposed project were included in the VMT Calculator: reduced parking supply, bicycle parking and infrastructure, improved transit stops, transit subsidies, and shared mobility. TDM reductions within each of these categories and for the project were applied according to the guidance found in the City of Los Angeles VMT Calculator Documentation (LADOT 2020).

Geometric Design Features or Incompatible Use Hazards

The determination of significance of potential geometric design features and incompatible use hazards is on a case-by-case basis and considers the following factors:

- The relative amount of pedestrian activity at project access points.
- Design features/physical configurations that the project introduces 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 facilities the project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle safety hazards.
- The project location, or project-related changes to the public right-of-way, relative to proximity to the HIN or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

In addition, the TAG provides the following steps to determine if the proposed project would constitute a safety impact to freeways:

- For the identified freeway off-ramps, prepare a queuing study for the "Future with Project" conditions for the proposed project build-out year. Evaluate the adequacy of the existing and future storage lengths with the 95th percentile queue and 100 percent of the storage length on each lane of the ramp from the stop line to the gore point. When an auxiliary lane is present, add 50 percent of the length of the auxiliary lane to the ramp storage area.
- If the proposed project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the proposed project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the addition of traffic generated by the proposed project would increase the overflow onto the mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact.
- If a proposed project adds two or more car lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact. If the speed differential is 30 mph or more, then there is a potential safety issue. The Caltrans Performance Measurement System data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable Performance Measurement System data are not

available at the subject location, other sources of speed data including location-based services data from available sources could be used.

- If the speed differential is 30 mph or more, which may result in a potential safety issue, the guidance suggests a proposed project should consider the following preferred corrective measures to offset a potential safety issue:
  - Transportation demand management program(s) to reduce the project's trip generation,
  - Investments to active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's trip generation, and/or
  - Potential operational change(s) to the ramp terminal operations including, but not limited to, lane reassignment, traffic signalization, signal phasing or timing modifications, etc. This option requires coordination with Caltrans and LADOT to assess feasibility and for approval of the proposed measure(s).

Emergency Access

The analysis of the project's potential emergency access impacts includes a review of the proposed vehicle access points and internal circulation. A determination is made pursuant to the thresholds of significance identified above regarding the potential for these features of the project to impede traffic flows and emergency vehicle access on adjacent streets and/or result in potential safety impacts.

b. Project Design Features

The following project design features (PDFs) relevant to transportation would be implemented as part of the proposed project:

PDF T-1 Construction Management Plan

Prior to the start of construction, a Construction Management Plan will be prepared and submitted to LADOT for review and approval in accordance with the time frames set forth in Executive Directive 1. The Construction Management Plan will include a Worksite Traffic Control Plan and Construction Worker Parking Plan that will facilitate traffic and pedestrian movement, minimize the potential conflicts between construction activities, street traffic, bicyclists and pedestrians, and ensure appropriate parking for construction workers is provided. Furthermore, the Construction Management Plan will include, but not be limited to, the following measures:

- A Worksite Traffic Control Plan(s), approved by the LADOT in accordance with the time frames set forth in Executive Directive 1, will be implemented to route vehicular traffic, transit, bicyclists, and pedestrians around any lane and/or sidewalk closures;
- Safety precautions for pedestrians and bicyclists will be implemented through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe access to the Port of Los Angeles High School.
- Minimize obstruction to land uses in proximity to the project site during construction, including temporary traffic constraints, temporary loss of access, and temporary loss of bus stops or rerouting of bus lines;
- Parking for construction workers will be provided either on-site or at off-site, off-street locations; and
- Ensure adequate emergency access is maintained to the project site and neighboring businesses and residences.

c. Project Impacts and Mitigation Measures

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

Impact TRA-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH THE TRANSPORTATION PROGRAMS, PLANS, ORDINANCES, AND POLICIES CONTAINED WITHIN THE MOBILITY PLAN 2035, VISION ZERO LOS ANGELES, LADOT MPP, CITYWIDE DESIGN GUIDELINES, LOS ANGELES MUNICIPAL CODE, A PLAN FOR A HEALTHY LOS ANGELES, SCAG 2020-2045 RTP/SCS, AND THE SAN PEDRO COMMUNITY PLAN. THEREFORE, THE PROPOSED PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As described in Section 2, *Project Description*, the proposed project would involve the phased demolition of existing structures on the OSP Specific Plan Site and the construction of up to 1,553 residential units, 85,000 sf of Neighborhood Serving Uses, and 45,000 sf of commercial retail uses. Construction on the OSP Specific Plan Site is anticipated to start in 2024 and would occur over three Phases over a period spanning approximately 14 to 20 years. The 327 Harbor Site would be developed with 47 residential units to serve as replacement housing for current Rancho San Pedro residents during construction on the OSP Specific Plan Site. Construction on the 327 Harbor Site is anticipated take place between 2023 and 2025.

The proposed project includes two development scenarios (see Section 2, *Project Description*) that would involve phasing the construction on the OSP Specific Plan Site in different ways. Under Scenario A, the densest development would be located in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2. Under both scenarios, the footprint of proposed development would be identical, construction and grading activities would be the same, and the overall buildout of the project site would involve the same types and amounts of land uses. Therefore, this analysis applies to both Scenario A and Scenario B.

Attachment D, Plan Consistency Worksheet, of the TAG identifies a series of City adopted programs, plans, ordinances, and policies that establish the transportation planning regulatory framework for development in the City. Attachment D of the TAG also provides a series of questions to help guide the review of the identified documents. Those questions and their responses are provided in Appendix B of the Transportation Assessment (see Appendix I of this Draft EIR/EIS). Each of the documents listed in Attachment D of the TAG was reviewed for applicability to the project, and the relevant transportation-related policies are described below, along with the project's conformance. Based on the TAG, the following plans, policies, and programs are relevant to analysis under Threshold 1 for the project: Mobility Plan 2035; San Pedro Community Plan; Vision Zero; LADOT MPP; the Citywide Design Guidelines; a Plan for a Healthy Los Angeles; and the SCAG 2020-2045 RTP/SCS. The project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below. Also refer to Section 4.1, *Aesthetics*, for a discussion of the project's consistency with the applicable goals and objectives of the Citywide Design Guidelines and Section 4.5, *Greenhouse Gas Emissions*, for a discussion of the project's consistency with the 2020-2045 RTP/SCS. As discussed therein, the proposed project would not conflict with the Citywide Design Guidelines or 2020-2045 RTP/SCS.

Mobility Plan 2035

Mobility Plan 2035 includes numerous policies and programs that are applicable to the proposed project. Table 4.13-1 provides determinations of whether the project would conflict with any of the applicable policies and programs in Mobility Plan 2035. As shown therein, the project would be consistent with the programs and policies established in Mobility Plan 2035.

Table 4.13-1 Project Consistency with Mobility Plan 2035

Policy/Program	Evaluation
Policy 2.1 Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	**No Conflict.** The proposed project includes the construction of new residential units, as well as local-serving retail and community amenities. Proposed transportation amenities include installation of new bicycle facilities, new pedestrian facilities, and new transit facilities.
Policy 2.3 Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** The proposed project frontage on 1st Street is a portion of the PED. In addition, the frontage on Centre Street is a PED until 2nd Street. The proposed project would improve pedestrian infrastructure by enhancing walking trails stretching from Harbor Boulevard Promenade through 1st and 2nd Streets. A Safe Routes to School Network would also be added along Mesa Street, 2nd Street, and the Beacon Promenade, connecting Barton Hill Elementary School to the Boys and Girls Club, as well as to the proposed Youth Sports Fields, Community Center, and Palos Verdes Linear Park.
Policy 2.10 Loading Areas. Facilitate the provision of adequate on and off-street loading.	**No Conflict.** The project proposes consolidating service and loading access and limiting truck access to 1st and 3rd Street.
Policy 3.2 People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** All proposed pedestrian accesses would be ADA-compliant, as well as the internal walking path on-site.
Policy 3.5 Multi-Model Features. Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	**No Conflict.** The proposed project would enhance existing bus stops within the project site and create a new transportation hub on the site. In addition, the proposed project would add new bicycle lanes and a bike hub and enhance the pedestrian environment with new walking paths and improved roadway safety features.
Policy 3.8 Bicycle Parking. Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No Conflict.** The proposed project would include 48 bicycle parking spaces on the 327 Harbor Site and over 1,600 bicycle parking spaces on the OSP Specific Plan Site. The project would also include a bike hub on the OSP Specific Plan Site that would provide shower and locker facilities and a repair shop.
Policy 3.9 Increased Network Access. Discourage the vacation of public rights-of-way.	**No Conflict.** The project proposes to restrict vehicle access on 2nd Street between Palos Verdes Street and Harbor Boulevard, and on Beacon Street between 1st Street and 3rd Street, starting in Phase 2. Pedestrian and bicycle access would be maintained on these streets with enhanced walking and bike paths. This would improve multi-modal connectivity and bicycle and pedestrian safety.

Policy/Program	Evaluation
Policy 3.10 Cul-de-sacs. Discourage the use of cul-de-sacs that do not provide access for active transportation options.	**No Conflict.** The proposed project would not create a cul-de-sac and the project site is not located adjacent to an existing cul-de-sac.
Policy 4.8 Transportation Demand Strategies. Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** The project proposes a series of TDM measures, such as a reduced parking supply, bicycle parking and amenities, transit stop improvements, and pedestrian infrastructure improvements to reduce dependence on single-occupancy vehicles.
Policy 4.13 Parking and Land Use Management. Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** The proposed project would provide 45 parking spaces on the 327 Harbor Site and 1,800 parking spaces on the OSP Specific Plan Site. The OSP Specific Plan would establish its own minimum parking standards which may deviate from those in the Los Angeles Municipal Code. As such, the proposed project would balance parking supply with other transportation and land use objectives.
5.1 Sustainable Transportation. Encourage the development of a sustainable transportation system that promotes environmental and public health.	**No Conflict.** The proposed project would encourage sustainable transportation by providing a mix of residential and local-serving commercial uses in a transit rich area and enhancing pedestrian and bicycle infrastructure.
5.2 Vehicle Miles Traveled. Support ways to reduce VMT per capita.	**No Conflict.** The project proposes a series of TDM measures, such as a reduced parking supply, bicycle parking and amenities, transit stop improvements, and pedestrian infrastructure improvements that would reduce VMT per capita.
5.4 Clean Fuels and Vehicles. Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	**No Conflict.** The proposed project would encourage the use of electric vehicles by providing 230 EV charging spaces on the OSP Specific Plan Site and 14 EV charging spaces on the 327 Harbor Site, consistent with LAMC requirements.
Program PL1 Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.	**No Conflict.** The project proposes to add 4 driveways along 1st Street and 2 driveways along Harbor Boulevard, which are Avenue II and Avenue I designations, and these driveways will not conflict with design guidelines.
Program PS.3 Pedestrian Loops. Explore the development of a connected network of walking passageways utilizing both public and private spaces, local streets and alleyways to facilitate circulation.	**No Conflict.** The proposed project would include walking path along 1st Street and 2nd Street, as well as the Palos Verdes Linear Park. Pedestrian access would also be maintained along public rights-of-way within the project site, and pedestrian safety would be enhanced with new crosswalks and traffic calming features.
Program PK.7 Off-Street Loading. In nonindustrial areas, require off-street dock and/or loading facilities for all new non-residential buildings and for existing non-residential buildings and undergoing extensive renovations and/or expansion, whenever practical.	**No Conflict.** The proposed project would include off-street loading facilities to minimize the potential for impacts to other travelers.

Source: Appendix I

San Pedro Community Plan

Table 4.13-2 summarizes the applicable policies in the San Pedro Community Plan and provides a discussion of the proposed project's consistency with the applicable policies. As shown therein, the project would not conflict with any of the applicable transportation policies contained in the San Pedro Community Plan.

Table 4.13-2 Proposed Project Consistency with the San Pedro Community Plan

Policy	Evaluation
Policy LU1.6 Alleys. Maintain and improve existing neighborhood alleys as an alternative, safe, well maintained vehicular access to homes that reduces curb cuts, driveways, and associated pedestrian-automobile conflicts along sidewalks.	**No Conflict.** The project site does not currently contain any alleys. The proposed project supports this policy by consolidating driveways to reduce the incidence of curb cuts and disruptions to sidewalks. Additional pedestrian access routes that are restricted to motor vehicles would be provided between buildings within the proposed project, which reduces pedestrian-automobile conflicts.
Policy LU5.16 Minimize parking impacts. Reduce the visual prominence of parking within the public realm by requiring off-street parking to be located behind or within structures or otherwise fully or partially screened from public view.	**No Conflict.** The proposed project supports this policy by providing an on-site parking garage for all uses. The parking garages would consist of both at-grade and subterranean facilities, reducing the visual prominence of surface parking lots.
Policy M1.1 Complete Streets. Ensure the community is served by a complete street system with some streets strategically prioritized for target users and other streets that connect the complement of arterials together to serve all users.	**No Conflict.** The proposed project supports this policy by proposing various improvements to the existing street network to serve diverse groups of users. Proposed improvements that serve the concept of complete streets include curb extensions, raised crossings, widened sidewalks, bike lanes, and traffic signals with signalized crossings.
Policy M1.2 Mobility for Challenged Users. Support wherever feasible, transportation programs and services aimed at enhancing the mobility of young people, senior citizens, disabled persons and other populations dependent on transit.	**No Conflict.** The project proposes mobility improvements that would serve challenged users and provide enhanced accessibility to existing transit service. Among these improvements are minimized curb cuts, which improve the pedestrian experience, curb extensions, which serve as a traffic calming and challenged user safety measure, raised intersections for better visibility of challenged users, and pedestrian plazas, to reduce conflicts between vehicles and challenged users.
Policy M1.3 Mobility Enhancements. Developments that increase density or intensity by zone change, variance, conditional use, parcel map, subdivision or other discretionary action should provide adequate mobility enhancements such as traffic mitigation, pedestrian crosswalks, bike lanes and enhanced bus stops to ensure that mobility needs are met.	**No Conflict.** The proposed project supports this policy by proposing various traffic calming and active transportation measures, including curb extensions, bicycle lanes, raised crossings, and improved bus shelters.
Policy M1.4 Private investment for off-site facilities/amenities. Encourage new developments to include bicycle and pedestrian amenities and include off-site transit and road improvements creating a circulation system that optimizes travel by all modes.	**No Conflict.** The proposed project incorporates several blocks of the existing city street grid. Roadway improvements included as part of the proposed project would enhance the public realm for both users of the proposed project and those who pass through the project site, which supports this policy.
Policy M2.1 Streetscapes. Encourage and support streetscape improvements in neighborhood areas that foster the appeal of the street as a gathering place including street furniture, well-maintained street trees, publicly accessible courtyards, wide sidewalks, bicycle access and appropriate traffic control measures to maintain safe travel speeds.	**No Conflict.** Two major components of the project are the proposed pedestrian plazas on portions of Beacon Street and 2nd Street, which would support this policy in a pedestrian-focused lens. In general, the pedestrian network proposed as part of the project would incorporate shade, landscaping, and street furniture, in addition to traffic calming measures such as curb extensions, traffic circles, and a road diet.
Policy M3.2 Priority Pedestrian Routes. Selected streets within commercial, mixed-use and employment districts should have pedestrian priority establishing pedestrian needs as paramount to vehicular circulation needs and encouraging investment in pedestrian improvements and programs for these segments.	**No Conflict.** The proposed project supports this policy by establishing pedestrian plazas on portions of Beacon Street and 2nd Street, which would restrict vehicular traffic and prioritize pedestrians.

Policy	Evaluation
Policy M3.3 Pedestrian Amenities. Maintain sidewalks, streets and right-of-way in good condition, free of obstructions, and with adequate lighting, trees and parkways. Streets should accommodate pedestrians comfortably through adequate sidewalks and parkway landscaping that provides a buffer from moving vehicles, shade from the hot sun, and street lighting that provides for safety during the night.	**No Conflict.** The proposed project supports this policy by incorporating adequate lighting, shade, and street furniture to the pedestrian network. The proposed project's streets would feature adequately wide and obstruction-free sidewalks, and enhanced pedestrian amenities would be provided in the Beacon Street and 2nd Street pedestrian plazas.
Policy M3.4 Minimize pedestrian conflicts. Minimize conflicts between buses, cars, and pedestrians by designing and constructing sidewalks and crosswalks that make pedestrians feel safe and creating well-marked crossings at intersections and mid-block locations.	**No Conflict.** The proposed project supports this policy with several design features that minimize pedestrian conflicts, including marked or raised crosswalks, curb extensions, and traffic medians with pedestrian refuge islands at various locations. Additionally, the pedestrian plazas proposed on portions of Beacon Street and 2nd Street would minimize conflict between pedestrians and vehicles.
Policy M3.5 Safe school routes. Encourage the development and improvement of safe routes to schools throughout the community via walking, bicycles or transit.	**No Conflict.** The proposed project includes various pedestrian, bicycle, and transit enhancements that would serve school children and support this policy. Such improvements include marked or raised crosswalks, curb extensions, traffic medians, bicycle climbing lanes, landscape buffers, bus shelters, pedestrian plazas, and the development of a Safe Route to School network.
Policy M4.1 Priority bikeways. Support the Citywide bikeway network to establish bicycle circulation as paramount to vehicular circulation needs on selected streets and to encourage investment in bicycle improvements and programs on these identified streets.	**No Conflict.** The proposed project designates 2nd Street and Harbor Boulevard as streets with bicycle priority, supporting this policy. The project proposes buffered bike lanes on 2nd Street between Pacific Avenue and Palos Verdes Street, in addition to off-street bicycle facilities, and a two-way bikeway on Harbor Boulevard.
Policy M4.2 Bikeway connections. Provide bicycle access for open space areas, commercial corridors, Downtown/Regional Center, Neighborhood Districts and Community Centers to allow easy connection between residential neighborhoods and employment centers, as well as important non-work destinations, including schools and recreational facilities.	**No Conflict.** The project's proposed bikeway on Harbor Boulevard supports this policy by establishing a two-way cycle track to serve the regional bikeway network. With proximity to the Los Angeles Waterfront, multiple parks, and other commercial uses in the Downtown San Pedro area, this feature would serve valuable connections between the project site and the surrounding area.
Policy M4.4 Regional coordination. Coordinate with adjacent jurisdictions and communities to ensure that local bicycle facilities be linked with those of neighboring areas.	**No Conflict.** The proposed project supports this policy by establishing a regional-serving bikeway on Harbor Boulevard. While bicycle facilities already exist on this corridor, the southbound buffered bike lane is planned to be maintained for local access, while a two-way cycle track would serve more regional use. In addition to bicycle prioritization on 2nd Street and existing facilities on Grand Avenue and Pacific Avenue, the project's proposed facilities would be connected to those in the surrounding neighborhood.
Policy M6.2 Pedestrian access to transit. Improve pedestrian amenities and urban design on streets served by transit to create welcoming conditions for pedestrians accessing transit.	**No Conflict.** The proposed project incorporates various pedestrian improvements that would support transit access, either through safety enhancement or increased comfortability. Among these improvements are raised crosswalks, widened sidewalks, curb extensions, traffic medians, landscape buffers, bus shelters, and pedestrian plazas.

Policy	Evaluation
Policy M7.3 Access management. Minimize driveways and consider the addition of medians on Arterials to ensure the smooth and safe flow of vehicles, buses, pedestrians and bicycles.	**No Conflict.** The proposed project supports this policy through minimization of driveways and use of pedestrian-only access points where possible. Though a Collector street, not an Arterial, the addition of medians on 3rd Street is proposed to aid in the smooth and safe flow of road users.
Policy M7.5 Emergency access. Develop, improve, and maintain streets that are easily accessible to emergency vehicles, and during emergency situations, such as sink holes, landslides, and other such type of events that may arise.	**No Conflict.** Streets within the project site would be designed to relevant standards and guidelines as to not impede emergency vehicle access.
Policy M8.1 Traffic calming. Support traffic calming measures and parking management for local and collector streets where a demonstrated need exists and with active community involvement.	**No Conflict.** The proposed project supports this policy by proposing various traffic calming measures, including a road diet, curb extensions, raised intersections, mini-traffic circles, new traffic controls, and medians. Where possible or available, the project proposes an expansion of diagonal parking.
Policy M8.2 Traffic mitigations for development. Require major developments to mitigate traffic impacts on residential neighborhoods	**No Conflict.** The proposed project supports this policy as it would not have any significant traffic impacts.
Policy M9.1 Regional coordination. Coordinate with Councils of Government and regional transportation planning agencies (such as SCAG and Metro) and adjacent cities to improve shuttle services, encourage ridesharing, bicycle sharing, and other TDM programs within the region.	**No Conflict.** The proposed project incorporates improvements that support the goals of other transportation agencies, such as Metro. For example, the pedestrian and bicycle improvements and transit shelters throughout the project site, and the proposed transit hub on 1st Street, support access to Metro bus stations and make ridership more convenient.
Policy M9.2 Reduce auto trips. Create incentives for employers, institutions, and residential neighborhoods to reduce their vehicle trips by encouraging mixed-use developments that minimize VMT.	**No Conflict.** The proposed project incorporates a mix of uses (residential and commercial) that allow for internal capture of trips and a minimization of VMT.
Policy M9.3 Alternatives to the automobile. Reduce automobile dependency by providing a safe, convenient transit system, pedestrian linkages and a network of safe and accessible bikeways and encouraging alternatives, including reduced emission vehicles, such as electric and neighborhood electric vehicles (NEVs).	**No Conflict.** The project proposes various pieces of infrastructure that provide alternatives to the automobile and support this policy. Elements that support pedestrian mobility include traffic calming measures such as a road diet, curb extensions, raised intersections, mini-traffic circles, new traffic controls, new walking paths, and medians. Bicycle mobility is supported by proposed bike facilities on 2nd Street and Harbor Boulevard, a bicycle hub, and bicycle parking. Transit mobility is supported through enhanced bus stop elements, such as shade and seating.
Policy M9.4 TDM Plans. Encourage major development projects to submit a TDM Plan to the City and provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, telecommuting, bicycling, and walking, etc.).	**No Conflict.** The project proposes a series of TDM measures, such as a reduced parking supply, bicycle parking and amenities, transit stop improvements, and pedestrian infrastructure improvements.
Policy M9.5 Transportation Management Associations. Support the formation of agencies and collaboratives such as TMAs that facilitate ridesharing in carpools and vanpools.	**No Conflict.** The project proposes an expansion of transit service with a vanpool program to connect residents to necessary destinations. While the specific operation details of such programs are to be determined, the proposed project would not preclude formation of agencies and collaboratives to facilitate their implementation and success.

Policy	Evaluation
Policy M11.3 Convert surface lots to structures. Support the development of City-owned or other surface parking lots into parking structures where appropriate	**No Conflict.** The proposed project supports this policy, all uses on-site would have its own parking in subterranean and semi-subterranean garages, replacing the currently existing on-site surface parking.
Policy M12.3 Priority parking for alternative fuel vehicles. Encourage new commercial and retail developments to provide prioritized parking for shared vehicles, electric vehicles and vehicles using alternative fuels.	**No Conflict.** The proposed project would include dedicated parking for alternative fuel vehicles, including electric vehicle parking.
Policy M12.4 Connections for electric vehicles. Encourage new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles (ZEVs) and/or plug-in electric hybrids (PHEV).	**No Conflict.** The proposed project would provide electric vehicle charging spaces in accordance with applicable codes.

Source: Appendix I

LADOT Manual of Policies and Procedures

The LADOT MPP provides plans and requirements for traffic infrastructure features in the city, including driveway design and placement guidelines, loading zones, roadway striping and other markings, signage, on-street parking, crosswalks, and turn lanes. MPP Section 321 allows up to two driveways for up to 400 feet of frontage and an additional driveway for every additional 400 feet of frontage. The proposed project would include two driveways along Harbor Boulevard on separate blocks which would be consistent with MPP Section 321. Two of the proposed driveways on 1st Street are along separate blocks which would be consistent with MPP Section 321. The other two 1st Street driveways would be located between Centre Street and Palos Verdes Street and access the street from the north on the same block. This block is more than 600 feet long, so it is acceptable to have two driveways in accordance with MPP Section 321 standards. MPP Section 321 also recommends two-way driveways for commercial/industrial/multi-family residential development be no wider than 30 feet in width. The proposed driveways would be approximately 24 feet wide, unless a greater width is determined necessary by the Director of Planning, LADOT, or the Los Angeles Fire Department (LAFD). Therefore, the proposed project would not conflict with LADOT's Manual of Policies and Procedures.

Vision Zero

Vision Zero implements projects that are designed to increase safety on the most vulnerable city streets. The project site is not located along any Vision Zero HIN priority corridors, and the proposed project would not conflict with the implementation of future Vision Zero projects in the public right-of-way. The proposed project would promote goals and objectives set forth in Vision Zero, including eliminating traffic deaths citywide by 2025, as the proposed project would create a Safe Routes to School Network, provide enhanced cross walks, and implement traffic calming features throughout the project site to improve pedestrian and bicycle safety. Thus, the proposed project would not conflict with Vision Zero.

Los Angeles Municipal Code

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. The proposed project would provide a minimum of 1,600 long-term bicycle parking spaces and 39 bicycle racks for short-term parking at the OSP Specific Plan Site. The proposed project would install 42 long-term bicycle parking spaces and 6 short-term bicycle parking spaces at the 327 Harbor Site and would

meet the LAMC requirements for on-site bicycle parking supply. Therefore, the proposed project would be consistent with LAMC Section 12.21.A.16.

LAMC Section 12.26.J, the TDM Ordinance, establishes TDM requirements for projects with at least 25,000 sf of non-residential floor area. The proposed project would incorporate TDM measures as part of the project design aimed at encouraging use of alternative transportation modes in accordance with the requirements set forth in the TDM Ordinance. Specifically, the proposed project would install pedestrian and bicycle improvements and transit shelters throughout the project site, and a proposed transit hub on 1st Street. In addition, the proposed project would support access to Metro bus stations which would make ridership convenient. These TDM features would encourage alternative transportation consistent with LAMC Section 12.26.J. Therefore, the proposed project would not conflict with the LAMC.

Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The proposed project would promote a healthy built environment by providing open space, recreational amenities, and new streetscape improvements to encourage walking and biking. The proposed project would support Policy 2.10, Social Connectedness, through the inclusion of courtyards, plazas, a promenade, and local-serving commercial retail. The proposed project would support Policy 3.2, Expand Parks, through the installation of a youth sports field and the development of over five acres of public park space.

The proposed project would also support Policy 5.7, Land Use Planning for Public Health and Greenhouse Gas Emission Reduction, through the installation of pedestrian, bicycle, and transit facilities which would facilitate multimodal transportation and easy access to the project site. In addition, the proposed project would incorporate TDM measures to reduce vehicle travel, including establishing lower parking requirements than the City's parking requirements. Therefore, the proposed project would not conflict with the policies of the Plan for a Healthy Los Angeles.

Based on the above, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

Mitigation Measures

Because impacts would be less than significant, mitigation is not required.

Significance After Mitigation

Project impacts would be less than significant without mitigation.

Threshold 2:	Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact TRA-2 THE PROPOSED PROJECT WOULD NOT GENERATE VMT THAT WOULD EXCEED THE THRESHOLDS ESTABLISHED BY LADOT. THEREFORE, THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As described in Section 2, *Project Description,* the proposed project would involve the phased demolition of existing structures on the OSP Specific Plan Site and the construction of up to 1,553

residential units, 85,000 sf of Neighborhood Serving Uses, and 45,000 sf of commercial retail uses. The proposed project includes two development scenarios that would involve phasing construction on the OSP Specific Plan Site in different ways. Under Scenario A, the densest development would be located in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2. However, the maximum development potential and square footage of the proposed land uses would remain the same in both scenarios. In addition, the 327 Harbor Site would be developed with 47 residential units under both scenarios. Accordingly, the VMT per capita would be the same under Scenario A and Scenario B and this analysis applies to both scenarios.

The City's VMT impact criteria for development projects are specified in the LADOT TAG and described under Section 4.13.3.a, *Significance Thresholds and Methodology*, above. As described therein, the project site is in the Harbor APC and is subject to a threshold of 9.2 daily VMT per capita for the proposed residential uses. The TAG states local-serving retail development, defined as retail uses less than 50,000 sf or if most of the vehicles are expected to be originating from the project vicinity, tend to shorten trips and reduce VMT and therefore do not generate a potentially significant VMT impact. The commercial retail uses of the proposed project would encompass 45,000 sf and would be local-serving for residents of the proposed project and the surrounding neighborhood. Therefore, the commercial retail portion of the proposed project would not result in a significant VMT impact.

VMT calculations for the proposed project without and with TDM measures were estimated using the City's VMT Calculator tool. According to the City's VMT Calculator tool, the proposed project would generate a total daily VMT of 92,376 and the daily household VMT per capita would be 6.7. With incorporation of the proposed project's TDM measures, the total daily and per capita household VMT would be 90,408 and 6.6, respectively. The daily household VMT per capita would be below the threshold of 9.2 daily household VMT per capita for the Harbor APC. Therefore, the proposed project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b) and impacts would be less than significant.

Mitigation Measures

Because impacts would be less than significant, mitigation is not required.

Significance After Mitigation

Project impacts would be less than significant without mitigation.

Threshold 3:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Impact TRA-3 THE PROPOSED PROJECT WOULD CONSTRUCT TRANSPORTATION FACILITIES IN ACCORDANCE WITH THE STANDARDS OF LADOT. THE PROPOSED PROJECT WOULD IMPLEMENT TRANSPORTATION FEATURES TO ENHANCE THE SAFETY OF THE PROJECT SITE FOR PEDESTRIANS, CYCLISTS, AND VEHICLES. IN ADDITION, THE PROPOSED PROJECT WOULD NOT GENERATE A SUBSTANTIAL SAFETY HAZARD TO FREEWAY OFF-RAMPS. THEREFORE, THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE OR INCOMPATIBLE USES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As described in Section 2, *Project Description,* the proposed project would involve the phased demolition of existing structures on the OSP Specific Plan Site and the construction of up to 1,553 residential units, 85,000 sf of Neighborhood Serving Uses, and 45,000 sf of commercial retail uses. The proposed project includes two development scenarios that would involve phasing construction

on the OSP Specific Plan Site in different ways. Under Scenario A, the densest development would be located in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2. The proposed roadway and pedestrian standards and modifications would be the same under both scenarios. Development at the 327 Harbor Site would also be the same under both scenarios. Therefore, this analysis applies to both Scenario A and Scenario B.

Local Safety

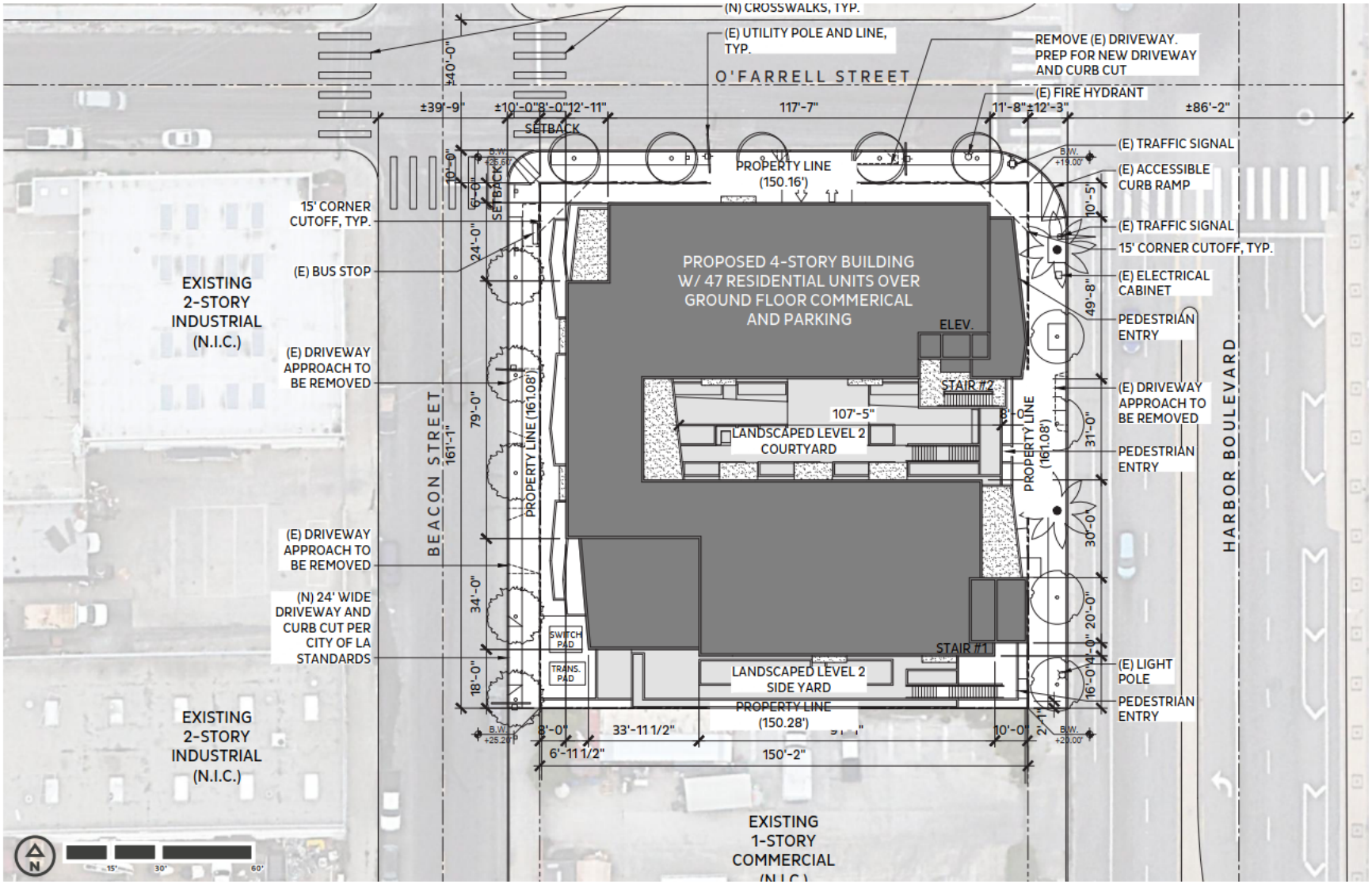
Operational and safety issues related to the potential for vehicle to pedestrian and vehicle to bicycle conflicts and the severity of consequences that could result were considered in the Transportation Assessment for locations where proposed driveways would cross pedestrian facilities or bicycle facilities (Appendix I). Proposed access plans were reviewed in accordance with Section 321 of LADOT's MPP. Vehicle access to the OSP Specific Plan would be provided by 15 driveways which would route to parking structures beneath the proposed buildings, as listed below and shown in Figure 4.13-2:

- Driveway 1A onto 1st Street between Centre Street and Palos Verdes Street
- Driveway 1B onto 2nd Street between Centre Street and Palos Verdes Street
- Driveway 2 onto 2nd Street between Mesa Street and Centre Street, east of Driveway 4
- Driveway 3 onto Mesa Street between 1st Street and 2nd Street
- Driveway 4 onto 2nd Street between Mesa Street and Centre Street, west of Driveway 2
- Driveway 5A onto 2nd Street between Centre Street and Palos Verdes Street
- Driveway 5B onto 3rd Street between Centre Street and Palos Verdes Street
- Driveway 6A onto Harbor Boulevard between 2nd Street and 3rd Street
- Driveway 6B onto 3rd Street between Palos Verdes Street and Beacon Street
- Driveway 7 onto 1st Street between Centre Street and Palos Verdes Street, east of Driveway 8
- Driveway 8 onto 1st Street between Centre Street and Palos Verdes Street, west of Driveway 7
- Driveway 9A onto 1st Street between Palos Verdes Street and Beacon Street
- Driveway 9B onto Harbor Boulevard between 1st Street and 2nd Street
- Driveway 10 onto Santa Cruz Street between Palos Verdes Street and Beacon Street

In addition, a two-way driveway would be provided on O'Farrell Street to access the 327 Harbor Site, as shown in Figure 4.13-3.

Figure 4.13-2 OSP Specific Plan Site Driveways

Figure 4.13-3 327 Harbor Site Conceptual Plan



The proposed project's access locations would be designed in accordance with City standards to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls. The proposed driveways would be designed to have adequate views of the adjacent bicycle facilities, and vehicle volumes would be spread across all proposed driveways so they would not be concentrated at one location. The proposed project would contribute to minimizing vehicle to pedestrian, vehicle to bicycle, and vehicle to vehicle conflicts by providing designated pedestrian space and locating driveways at right angles to avoid visibility challenges. The proposed driveways would not be located on any street segments designated by the LADOT as a HIN. The proposed project would reduce the number of driveways/curb cuts at the OSP Specific Plan Site from 31 under existing conditions to 15 which would reduce the opportunities for pedestrians and bicycles to interact with vehicles. The proposed project would limit truck access to 1st Street and 3rd Street to reduce the potential for trucks to interact with pedestrian and bicycles. The proposed project's loading areas would be located off-street and would be incorporated with access to parking facilities in accordance with the provisions of LAMC Section 12.21-C.6.

Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. Additionally, the proposed project would develop a Safe Routes to School Network along Mesa Street, 2nd Street, and Beacon Promenade, connecting Barton Hill Elementary School to the Boys and Girls Club, as well as to the proposed Youth Sports Fields, Community Center, and Palos Verdes Linear Park. Bicycle lanes would be added to 2nd Street between Pacific Avenue and Palos Veers Street, with off-street bicycle facilities extending to the Harbor Boulevard Promenade. The proposed new traffic signal at the intersection of 2nd Street and Pacific Avenue would improve east-west bicycle connectivity on 2nd Street. These improvements would reduce the potential for traffic hazards to occur. Furthermore, the proposed project includes residential and retail uses in an area developed with similar uses and does not include any incompatible uses such as farm equipment or sharp curves. As a result, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be less than significant.

Freeway Safety

A freeway safety analysis evaluates a project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline. The guidance on freeway safety analysis requires freeway off-ramps where a proposed project would add 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. The proposed project is projected to add 25 or more trips to the following freeway off-ramps:

- I-110 southbound off-ramp to Gaffey Street
- SR 47 westbound off-ramp to Front Street
- SR 47 eastbound off-ramp to Harbor Boulevard

As detailed in the Transportation Analysis, the proposed project would not exceed the queue length of the I-110 southbound off-ramp, SR 47 westbound off-ramp, or SR 47 eastbound off-ramp such that any of the ramp capacities would not be exceeded. The proposed project would not add more than two car lengths to an off-ramp and would not extend off-ramp queues such that vehicles would be

queued at gore points[14] at the off-ramps (Appendix I). Therefore, the proposed project would result in less than significant impacts to freeway safety.

Mitigation Measures

Because impacts would be less than significant, mitigation is not required.

Significance After Mitigation

Project impacts would be less than significant without mitigation.

Threshold 4: Would the project result in inadequate emergency access?

Impact TRA-4 PROJECT CONSTRUCTION COULD RESULT IN TEMPORARY DELAYS AND PARTIAL LANE CLOSURES THAT COULD AFFECT EMERGENCY ACCESS. HOWEVER, IMPLEMENTATION OF A CONSTRUCTION MANAGEMENT PLAN WOULD ENSURE THAT ADEQUATE EMERGENCY ACCESS IS MAINTAINED THROUGHOUT PROJECT CONSTRUCTION. PROJECT DESIGN WOULD COMPLY WITH CITY AND LOS ANGELES FIRE DEPARTMENT STANDARDS FOR SITE ACCESS AND EMERGENCY VEHICLE ACCESS. THEREFORE, THE PROPOSED PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS DURING PROJECT OPERATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed project would involve the phased demolition of existing structures on the OSP Specific Plan Site and the construction of up to 1,553 multi-family residential units, 85,000 sf of services, amenities and administration uses, and 45,000 sf of local-serving commercial/retail uses. The proposed project also includes the construction of 47 housing units on the 327 Harbor Site. Two project development scenarios are proposed (see Section 2, *Project Description*) that would involve phasing construction in different ways. Under Scenario A, the densest development would be located in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2. Under both Scenarios, the footprint of development would be identical, construction and grading activities would be the same, roadway standards and improvements and site circulation would be identical, and the same types and amounts of land uses would be developed as a whole. Therefore, this analysis applies to both Scenario A and Scenario B.

Construction

Project construction activities, such as temporary lane closures, and traffic could potentially affect emergency access to the project site and surroundings. However, as discussed in Section 4.11, *Public Services*, and Section 4.6, *Hazards and Hazardous Materials*, travel would be maintained on all streets around the project site, including designated evacuation route streets, and emergency access would be available throughout construction. In addition, a Construction Management Plan developed in coordination with LADOT and emergency service providers would be implemented during project construction pursuant to PDF T-1 to ensure that adequate and safe access remains available within and near the project site during construction activities. Therefore, project construction would not result in inadequate emergency access.

[14] A gore is the triangular area located in between the lanes of a highway and either an on- or off-ramp. A gore point is the point which an on-ramp first joins the highway or an off-ramp first leaves the highway.

Operation

The project site is located in an established urban area that is well served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Emergency access to the project site and surroundings is currently provided by Santa Cruz Street, Palos Verdes Street, Beacon Street, Harbor Boulevard, 1st Street, 2nd Street, 3rd Street, Mesa Street, Centre Street, and O'Farrell Street. Designated evacuation routes near the project site include Harbor Boulevard to the east of the project site and South Pacific Avenue one block west of the OSP Specific Plan Site. Other designated evacuation routes include I-110 and SR 47 (City of Los Angeles 2022; County of Los Angeles 2022).

As discussed in Section 4.11, *Public Services*, emergency access to the project site would continue to be provided from roadways near the project site, including Santa Cruz Street, Palos Verdes Street, Beacon Street, Harbor Boulevard, 1st Street, 2nd Street, 3rd Street, Mesa Street, Centre Street, and O'Farrell Street. The project would provide for LAFD emergency access using fire apparatus access roads in accordance with applicable requirements found in LAMC Section 57.503. During operation, the proposed new traffic signals would improve traffic flow along Harbor Boulevard and Pacific Avenue and would not interfere with designated evacuation routes or emergency access. The proposed project's transportation and access components would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle access. Compliance with City requirements would be confirmed as part of the Los Angeles Fire Department's fire/life safety plan review and inspection for new projects, as set forth in LAMC Section 57.118. Adherence to City policies would ensure the proposed project would not result in inadequate emergency access. Therefore, this impact would be less than significant.

Mitigation Measures

Because impacts would be less than significant, mitigation is not required.

Significance After Mitigation

Project impacts would be less than significant without mitigation.

4.13.4 Cumulative Impacts

As discussed in Section 3.4, *Cumulative Development*, 12 projects have been identified within a 0.5-mile radius of the project site for inclusion in the cumulative impact analysis. The 12 cumulative projects comprise a variety of uses, including residences, restaurants, hotels, and retail uses, as well as mixed-use developments incorporating some or all of these elements. The nearest cumulative projects are the proposed mixed-use building at 111 north Harbor Boulevard, immediately to the east of the OSP Specific Plan Site, and the multi-family residential project at 319-345 Beacon Street/117 O'Farrell Street immediately west of the 327 Harbor Site.

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

The related projects and other cumulative development in San Pedro would be subject to the same circulation-related programs, plans, ordinances, and policies as the proposed project. Cumulative projects would be required to demonstrate consistency with the Mobility Plan 2035, Vision Zero Los Angeles, LADOT's Manual of Policies and Procedures, Citywide Design Guidelines, LAMC, Vision Zero, Plan for a Health Los Angeles, and the San Pedro Community Plan, which guide development of

transportation systems and circulation in the city. The related projects primarily propose medium- to high-density residential and mixed-use development in an area with good transit connectivity and active transportation options, reducing dependence on automobiles and encouraging more active travel modes. In addition, similar to the proposed project, it is anticipated that none of the related projects would preclude future Vision Zero Safety Improvements by the City. As with the proposed project, each related project would also include the required number of bicycle parking spaces in accordance with LAMC requirements and would implement TDM strategies, as applicable, in accordance with the City's TDM Ordinance. As a result, project impacts with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system would not be cumulatively considerable, and cumulative impacts would be less than significant.

b. VMT

A development project would have a cumulative VMT impact if it were deemed inconsistent with the SCAG RTP/SCS, the regional plan to reach State air quality and GHG reduction targets. Based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. As evaluated above, the proposed project would result in a less than significant VMT impact. Additionally, the project site is an infill location with convenient access to public transit and opportunities for walking and biking, which would result in a reduction of vehicle trips, VMT, and GHG emissions. Specifically, the project site is in a transit-rich neighborhood serviced by Metro local and rapid bus lines and LADOT regional lines. In addition, the proposed project would include a variety of commercial uses and services that would encourage residents in the area to walk to nearby destinations to meet their shopping needs, thereby reducing VMT and GHG emissions. Therefore, project impacts with respect to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.

c. Hazardous Design Features

According to the TAG, a cumulative impact analysis for potential geometric design or land use hazards should consider the effect of access to related projects in the same block as the project site. Related projects within the same block as the proposed project include 111 North Harbor Boulevard project and the 319-345 Beacon Street and 117 O'Farrell Street project. The 319-345 Beacon Street and 117 O'Farrell Street project driveway would be located on Beacon Street, whereas the driveway access for the proposed building at the 327 Harbor Site would be located on O'Farrell Street (Sharp 2022). Therefore, a cumulative geometric design and safety impact would not be anticipated at this location. The 111 North Harbor Boulevard project would include subterranean parking accessed by Beacon Street (City of Los Angeles 2020). The proposed project does not include any driveways on Beacon Street; therefore, a cumulative geometric design and safety impact would not be anticipated related to the 111 North Harbor Boulevard project. In addition, cumulative development would be required to implement adequate circulation controls to protect pedestrians and enhance bicycle safety, in accordance with Section 321 of LADOT's Manual of Policies and Procedures, LAMC requirements, and Los Angeles Fire Department requirements. Regulatory compliance would effectively reduce the potential for individual projects to create a transportation hazard within the cumulative setting. Therefore, project impacts with respect to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.

Regarding freeway safety, cumulative impacts could occur if the increased traffic induced by cumulative development would lead to extended queues and unsafe conditions at freeway on- or off-ramps. Based on the project Transportation Assessment, queue lengths at the I-110 and SR-47 off-ramps would not exceed the ramp capacity during peak hour under cumulative conditions. Accordingly, the proposed project's contribution to cumulative freeway safety impact would not be cumulatively considerable, and cumulative impacts would be less than significant.

d. Emergency Access

Cumulative development could result in cumulative impacts to emergency access if cumulative projects obstruct or add substantial traffic to the project site and its vicinity which could impede emergency access. Cumulative development in proximity to the project site includes the 111 North Harbor Boulevard project, the 318 North Harbor Boulevard project, the 319-345 Beacon Street and 117 O'Farrell Street project, and 511 South Harbor Boulevard project. If construction occurs concurrently, it is possible cumulative development would require concurrent lane closures or detours which could impair emergency access. However, similar to the proposed project, cumulative projects would be required to implement Construction Management Plans, including traffic control plans, which would be coordinated with LADOT and emergency service providers to ensure adequate emergency access is maintained throughout construction.

As with the proposed project, any driveway and/or circulation modifications proposed as part of the related projects would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Moreover, the additional traffic generated by cumulative development in vicinity of the project site would be dispersed throughout the study area and would not be concentrated to a specific location. Furthermore, as previously discussed, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, as with the proposed project, the related project would not be anticipated to result in inadequate emergency access. As such, project impacts to emergency access would not be cumulatively considerable and cumulative impacts would be less than significant.