

IV. Environmental Impact Analysis

M. Transportation

1. Introduction

This section analyzes the Project’s potential impacts on Transportation. The analysis is primarily based on the Transportation Assessment for the Buena Vista Project (Transportation Assessment) prepared for the Project by Gibson Transportation Consulting, Inc., dated April 2022 and the Supplemental Transportation Assessment for the Buena Vista Project (Supplemental Transportation Assessment) prepared in August 2024, included in Appendix K.1 and K.2, respectively, of this Draft EIR.^{1,2}

The Transportation Assessment was approved by the Los Angeles Department of Transportation (LADOT) in June 2022.³ The Transportation Assessment was evaluated in accordance with the adopted methodology and guidelines from the July 2020 Transportation Assessment Guidelines (TAG) in effect at the time of the approval. Subsequently, the number of affordable housing units between the South and North Parcels has been refined, and the completion years of the South and North Parcels have been extended. In addition, an update to the TAG was released in August 2022. The Supplemental Transportation Assessment reflects these updates and provides for an analysis of vehicle miles traveled (VMT) in accordance with the latest California Environmental Quality Act (CEQA) Guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project’s effect on automobile delay. The Supplemental Transportation Assessment was approved by LADOT on September 18, 2024.⁴ Copies of LADOT’s approvals for the Transportation Assessment and the Supplemental Transportation Assessment are included in Appendix K.3 and K.4 of this Draft EIR.

¹ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Buena Vista Project, Los Angeles, California, April 2022*. Refer to Appendix K.1 of this Draft EIR.

² Gibson Transportation Consulting, Inc., *Supplemental Transportation Assessment for the Buena Vista Project, Los Angeles, California, August 14, 2024*. Refer to Appendix K.2 of this Draft EIR.

³ *Inter-Departmental Correspondence: Transportation Assessment for the Proposed Buena Vista Mixed-Use Development Project at 1030 North Broadway (June 6, 2022) (LADOT Assessment Letter)*. Refer to Appendix K.3 of this Draft EIR.

⁴ *Inter-Departmental Correspondence: Updated Transportation Impact Assessment for the Proposed Buena Vista Mixed-Use Development at 1030 North Broadway (September 18, 2024) (LADOT Assessment Letter—Supplemental Transportation Assessment)*. Refer to Appendix K.4 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Americans with Disabilities Act of 1990
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035
- Central City North Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- LADOT Interim Guidance for Freeway Safety
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles

(1) Federal

(a) Americans with Disabilities Act of 1990

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

(2) State

(a) Complete Streets Act

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

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

(b) Assembly Bill 32 and Senate Bill 375

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

On December 11, 2008, the California Air Resources Board (CARB) adopted its first 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 revision schedule of housing and transportation elements.

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

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

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

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

(c) California Vehicle Code

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

(d) *Senate Bill 743*

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

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

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

(e) *CEQA Guidelines Section 15064.3*

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation

impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop⁵ or a stop along an existing high-quality transit corridor⁶ 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 1.4 (June 2023) (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 current version of the TAG.

(3) Regional

(a) Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy

In compliance with SB 375, on April 4, 2024, the Southern California Association of Governments (SCAG) Regional Council adopted the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024–2050 RTP/SCS and also referred to as Connect SoCal 2024), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2024–2050 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 2024–2050 RTP/SCS builds on the long-range vision of SCAG’s prior 2020–2045 RTP/SCS to balance future mobility and housing needs with economic, environmental and

⁵ “Major transit stop” is defined in Public Resources Code (PRC) Section 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. AB 2553, approved on September 19, 2024, amends PRC Section 21064.3 to revise the definition of “major transit stop.” The new definition increases the service interval frequency to 20 minutes, whereas the previous definition required a frequency of 15 minutes or less during peak commute periods.

⁶ “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.

public health goals. A substantial concentration and share of growth is directed to Priority Development Areas (PDAs), which include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), Livable Corridors, and Spheres of Influence (SOIs) (in unincorporated areas only). These areas account for approximately eight percent of SCAG's total land area and 66 percent of forecasted household growth and 54 percent of forecasted employment growth between 2019 and 2050. NMAs vary in their specific form and locations and are aimed at improving, restoring, and enhancing safe and convenient connections to community facilities through intersection density, low-speed streets, land use diversity, and accessibility to amenities within one mile using street network distances. TPAs are PDAs that are within 0.5 miles of a major transit stop that is existing or planned. Livable Corridors are areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. SOIs are existing or planned service areas within the planning boundary outside of an agency's legal boundary. The intent of an SOI is to promote the efficient, effective and equitable delivery of local and regional services for existing and future residents and to encourage a collaborative process between agencies.

The goals of the 2024–2050 RTP/SCS fall into four core categories: mobility, communities, environment and economy. The 2024–2050 RTP/SCS invests \$751.7 billion in the transportation system, primarily in operations and maintenance, to ensure the continued performance of the current network. By achieving the forecasted growth of households and new jobs in the region in PDAs, the 2024–2050 RTP/SCS intends to create a region with:

- Transit as a backbone of the transportation system
- More Complete Streets where people and safety are prioritized
- Policies that encourage emerging technologies and mobility innovations that support rather than hamper regional goals
- More housing, jobs and mobility options closer together in Priority Development Areas to preserve natural lands and open spaces
- More housing to address the “existing housing need” as defined by the Regional Housing Needs Assessment
- Safe and fluid movement of goods, with a commitment to the broad deployment of zero- and near-zero emission technologies

Specific to the core category of mobility, the 2024–2050 RTP/SCS includes the following categories of mobility policies and strategies:

- System Preservation and Resilience

- Complete Streets
- Transit and Multimodal Integration
- Transportation System Management,
- Transportation Demand Management
- Technology Integration
- Safety
- Funding the System/User Fees

When compared with the 2019 baseline condition, upon full implementation of the 2024–2050 RTP/SCS in 2050, the 2024–2050 RTP/SCS would result in an 11.6-percent reduction in daily VMT per capita, a 31.8-percent reduction in daily minutes of traffic delay, and a 7.9-percent increase in work-related transit trips.

(4) Local

(a) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City’s General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.⁷ 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.

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

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

Street classifications are designated in the Mobility Plan, 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 connect to other streets at both ends.
 - Non-Continuous local streets lead to a dead-end.

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

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.

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

(b) Central City North Community Plan

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

The Project Site is located within the Central City North Community Plan (Community Plan) area. The Community Plan was adopted in 2000 and amended in 2016 as part of the Mobility Plan Update. The Community Plan includes transportation-related objectives, policies, and programs, as well as design policies included in the Urban Design chapter, which are focused on enhancing the pedestrian environment and reducing VMT. Additionally, a Transportation Improvement and Mitigation Plan (TIMP) was prepared for the Community Plan. The TIMP establishes a program of specific measures which are recommended to be undertaken during the life of the Community Plan.

The Department of City Planning recently updated the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan, which became effective on January 27, 2025. Since the application for the Project was filed and deemed complete before DTLA 2040 became effective, the provisions of DTLA 2040 do not apply to this Project. As such, the Central City North Community Plan

is still the operative land use document for the Project Site, and, therefore, DTLA 2040 is not applicable to the Project or Project Site.

(c) Los Angeles Municipal Code

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

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued 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 G provides for Transportation Demand Management (TDM) and Trip Reduction Measures that are applicable to the construction of new non-residential gross floor area. Different TDM requirements are provided for developments in excess of 25,000 square feet of gross floor area, 50,000 square feet of gross floor area, and 100,000 square feet of gross floor area. The TDM requirements set forth therein vary depending upon the maximum non-residential gross floor area described above, and include measures, such as the provision of a bulletin board, display case, or kiosk with transit information and carpool/vanpool parking spaces.

(d) LADOT Transportation Assessment Guidelines

As discussed above, pursuant to CEQA Guidelines Section 15064.3 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 updated the TAG in

August 2022. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies, including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG has been developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.⁸

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, which was incorporated into the latest TAG. The City Freeway Guidance relates to the identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects, and provides a methodology and significance criteria for assessing whether additional vehicle queuing 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.

(e) LADOT Manual of Policies and Procedures Section 321

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

(f) Vision Zero

The Vision Zero program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last updated in 2018, represents 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.

⁸ LADOT, *Transportation Assessment Guidelines*, August 2022.

(g) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the urban design principles set forth in the Framework Element 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.

(h) 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.⁹ Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b. Existing Conditions

Based on consultation with LADOT and factors identified in the TAG, the Project's study area (Study Area) analyzed in the Transportation Assessment includes intersections along North Broadway between Cesar E. Chavez Avenue and Avenue 18 and Spring Street between College Street and Avenue 18. As illustrated in Figure 3 of the Transportation Assessment, the Study Area includes a total of 10 signalized intersections, including one location at the proposed driveway to the North Parcel. The following discussion describes the key streets, transportation facilities, and transit routes serving the Project Site, generally located within a 0.25-mile radius, as illustrated in Figures 3 through 9 in the Transportation Assessment.

(1) Existing Street Systems

The existing street system in the Study Area consists of a regional roadway system including freeways, primary and secondary arterials, and collector and local streets that provide regional, sub-regional, or local access and circulation within the Study Area.

⁹ *City of Los Angeles Department of City Planning, Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, 2015.*

(a) *Streets and Highways*

Listed below are the freeways and roadways within the Study Area that provide regional and local access to the Project Site:

- State Route 110 (SR-110) is a freeway that generally runs in the northeast-southwest direction and is located approximately 800 feet west of the Project Site. SR-110 provides three travel lanes in each direction. Access to and from SR-110 is available via interchanges and Hill Street, Bishops Road, and Solano Avenue within the Study Area.
- Interstate 5 (I-5) is a freeway that generally runs in the north-south direction and is located approximately 0.5 miles northeast of the northern tip of the North Parcel. I-5 generally provides four travel lanes in each direction within the Study Area. Access to and from I-5 is available via interchanges at Pasadena Avenue and Broadway within the Study Area.
- North Broadway is a designated Avenue II southwest of Pasadena Avenue, a designated Modified Avenue II between Pasadena Avenue and Avenue 18/Spring Street, and a designated Avenue I northeast of Avenue 18/Spring Street and travels in the northeast-southwest direction. It is located adjacent to the western/northern boundary of the Project Site. It provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections and a center turn lane north of College Street. Inside lanes are typically 10 feet wide and the total paved width is typically 66 feet. The Project proposes access to and from North Broadway.
- Spring Street is a designated Avenue I south of Cesar E. Chavez Avenue, a designated Collector Street between Cesar E. Chavez Avenue and Alpine Street, a designated Avenue III between Alpine Street and College Street, a designated Modified Avenue I between College Street and Aurora Street, and a designated Avenue I between Aurora Street and Avenue 18. It travels in the northeast-south direction and merges with Alameda Street at College Street and North Broadway at Avenue 18. It is located approximately 150 feet east of the South Parcel and generally provides four travel lanes, two lanes in each direction with left-turn lanes at intersections, and a center turn lane between College Street and Elmyra Street. Inside lanes are typically 11 feet wide and the total paved width varies between 42 and 84 feet. The Project proposes one driveway that would connect to Spring Street.
- Pasadena Avenue is a designated Avenue II and generally travels in the northeast-southwest direction. It is located northeast of the Project Site and provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections. Inside lanes are typically 10 feet wide and the total paved width is typically 64 feet.
- Avenue 18 is a designated Modified Collector Street north of North Broadway and a Modified Local Street south of North Broadway and generally travels in the

northwest-southeast direction. It is located east of the Project Site and provides two travel lanes, one lane in each direction, with left-turn lanes at intersections. Inside lanes are typically 12 feet wide and the total paved width is typically 40 feet.

- Casanova Street is a designated Local Street and travels in the southeast-northwest direction. It is located directly opposite of the Project Site and provides two travel lanes, one in each direction. The total paved width is typically 22 feet. The Project proposes a driveway along North Broadway that would align with Casanova Street.
- Solano Avenue is a designated Local Street and generally travels in the southeast-northwest direction in the Study Area. It is located directly opposite of the Project Site and provides two travel lanes, one lane in each direction, with left-turn lanes at intersections. The total paved width is typically 36 feet. The Project proposes a driveway along North Broadway that would align with Solano Avenue.
- Bishops Road is a designated Collector Street and generally travels in the southeast-northwest direction. It is located directly opposite of the Project Site and provides two travel lanes, one lane in each direction. The total paved width is typically 34 feet.
- Cottage Home Street is a designated Local Street and travels in the southeast-northwest direction. It is located directly opposite of the Project Site and provides two travel lanes, one lane in each direction. The total paved width is typically 38 feet. The Project proposes a driveway along North Broadway that would align with Cottage Home Street.
- Bernard Street is a designated Collector Street and travels in the east-west direction. It is located approximately 170 feet west of the South Parcel and provides two travel lanes, one in each direction, and a center turn lane. The total paved width is typically 56 feet.
- College Street is a designated Local Street west of Adobe Street/New Depot Street, a designated Collector Street between Adobe Street/New Depot Street and Hill Street, a designated Avenue III between Hill Street and Spring Street/Alameda Street, a designated Modified Collector Street between Spring Street/Alameda Street and Main Street, and a designated Local Street east of Main Street. It travels in the east-west direction. It is located south of the Project Site and provides four travel lanes, two lanes in each direction. Inside lanes are typically 10 feet wide and the total paved width is typically 40 feet.
- Alpine Street is a designated Collector Street west of Hill Street, a designated Avenue III between Hill Street and Spring Street, a designated Avenue II between Spring Street and Alameda Street, and a designated Avenue I between Alameda Street and Main Street. It travels in the east-west direction and merges with Vignes Street at Main Street. It is located south of the Project Site and provides four travel

lanes, two lanes in each direction. Inside lanes are typically 10 feet wide and the total paved width is typically 40 feet.

- Ord Street is a designated Collector Street and travels in the east-west direction. It is located south of the Project Site and provides two travel lanes, one in each direction. The total paved width is typically 40 feet.
- Cesar E. Chavez Avenue is a designated Avenue I and travels in the east-west direction. It is located south of the Project Site and provides five travel lanes, three eastbound and two westbound lanes, with left-turn lanes at intersections. It also provides a bus-only lane in the westbound direction. Inside lanes are typically 10 feet wide and the total paved width is typically 85 feet.

Figure IV.M-1 and Figure IV.M-2 on pages IV.M-17 and IV.M-18 identify the roadway designations and modal priorities, respectively, of the streets within the Study Area based on the Mobility Plan. As shown in Figure IV.M-2, Hill Street between College Street and Cesar E. Chavez, North Broadway east of Avenue 18 and between College Street and Cesar E. Chavez Avenue, Alameda Street south of Alpine Street, College Street between Yale Street and Spring Street, and Alpine Street between North Broadway and Alameda Street have been identified as part of the HIN.

(2) Public Transit Service

The Study Area is served by bus lines operated by Metro, LADOT Downtown Area Shuttle (DASH) and Commuter Express, Santa Clarita Transit, Antelope Valley Transit Authority (AVTA), and the Torrance Transit. The following bus and rail lines provide service within the Study Area:

- Metro Local 28 is a local line that travels from Century City to Downtown Los Angeles via Olympic Boulevard. This line operates between the hours of 4:30 A.M. and 2:00 A.M. and has average headways of eight to 10 minutes during the A.M. peak period and six to nine minutes during the P.M. peak period.
- Metro Local 33 is a local line that travels from Downtown Los Angeles to Santa Monica via Venice Boulevard. This line operates between the hours of 4:00 A.M. and 1:00 A.M. and has average headways of 15 to 20 minutes during the A.M. peak periods and 11 to 15 minutes during the P.M. peak periods.
- Metro Local 45 is a local line that travels from Lincoln Heights to Downtown Los Angeles and Rosewood via North Broadway. This line operates 24 hours a day and has average headways of eight to 14 minutes during the A.M. peak period and eight to nine minutes during the P.M. peak periods.

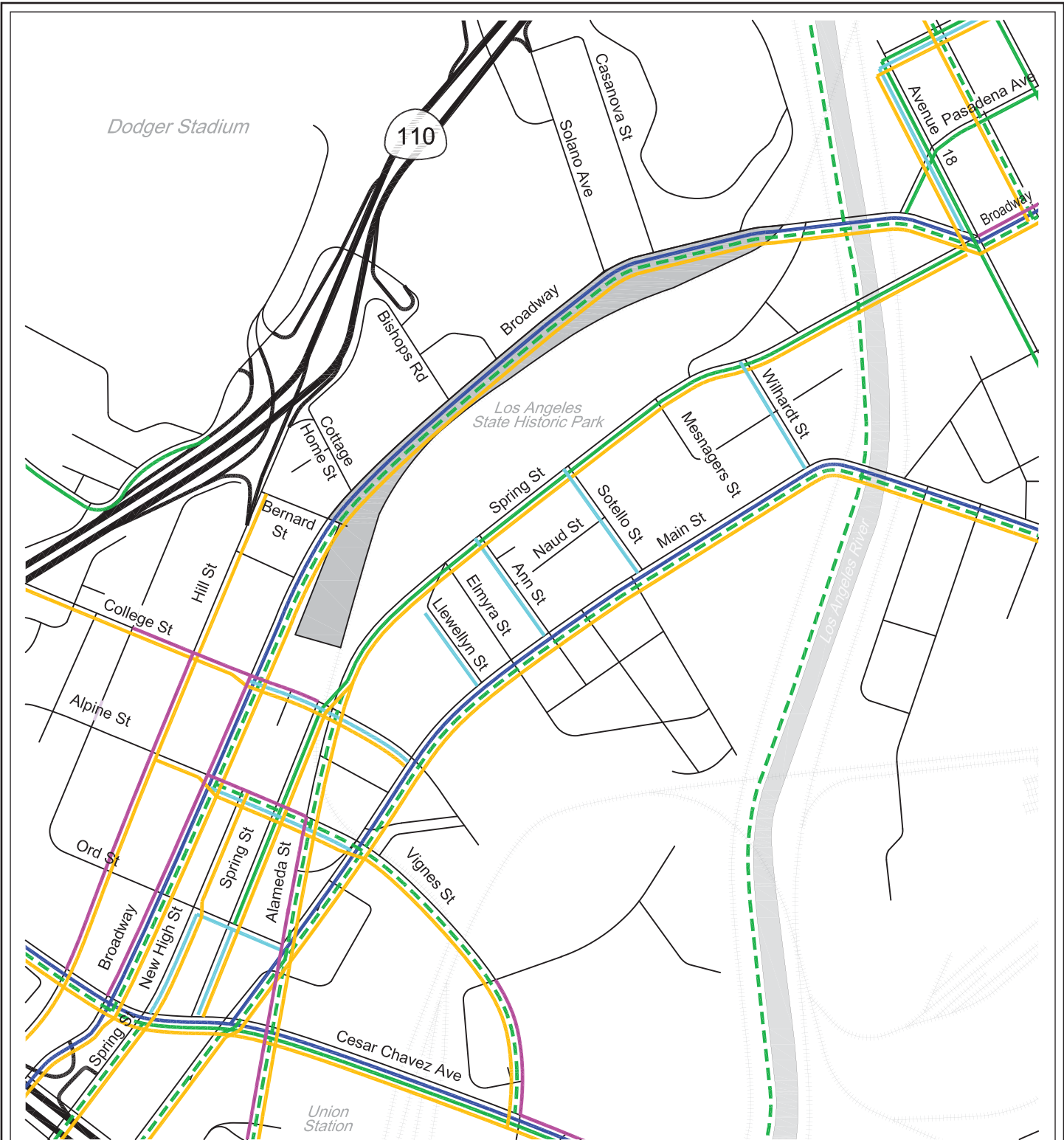


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- | | | | |
|--------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
|  Project Site |  Avenue I |  Avenue III |  Local / Other |
| |  Avenue II |  Collector |  Modified |



Figure IV.M-1
Roadway Designations in the Study Area



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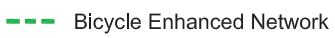
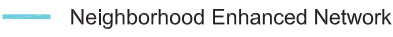
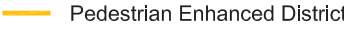

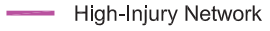
- | | | |
|-------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|  Project Site |  Transit Enhanced Network |  Bicycle Enhanced Network |
|  Neighborhood Enhanced Network |  Pedestrian Enhanced District |  Bicycle Lane Network |
| |  High-Injury Network | |



Figure IV.M-2
Modal Priorities in the Study Area

- Metro Local 70 is a local line that travels from Downtown Los Angeles to El Monte via Cesar Chavez Avenue/Atlantic Boulevard/Garvey Avenue. This line operates 24 hours a day and has average headways of eight to 11 minutes during the A.M. peak period and six to eight minutes during the P.M. peak period.
- Metro Local 76 is a local line that travels from Downtown Los Angeles to El Monte via Valley Boulevard. This line operates 24 hours a day and has average headways of 15 to 22 minutes during the A.M. peak period and 13 to 16 minutes during the P.M. peak period.
- Metro Local 78 is a local line that travels from Downtown Los Angeles to Arcadia via Las Tunas Drive/Huntington Drive. This line operates between the hours of 4:00 A.M. and 2:00 A.M. and has average headways of 10 to 15 minutes during the A.M. peak period and 8 to 11 minutes during the P.M. peak period.
- Metro Local 81 is a local line that travels from Eagle Rock to Downtown Los Angeles and Harbor Freeway Station via Figueroa Street. This line operates 24 hours a day and has average headways of 14 to 18 minutes during the A.M. peak period and 12 to 16 minutes during the P.M. peak period.
- Metro Local 90 is a local line that travels from the Los Angeles Civic Center to Sunland and North Hollywood via Glendale Avenue/Foothill Boulevard/Vineland Avenue. This line operates between the hours of 4:00 A.M. and 11:30 P.M. and has average headways of 20 to 27 minutes during the A.M. peak period and 15 to 18 minutes during the P.M. peak period.
- Metro Local 94 is a local line that travels from Downtown Los Angeles to Glendale, Burbank, and North Hollywood via San Fernando Road/Magnolia Boulevard. This line operates between the hours of 4:30 A.M. and 2:30 A.M. and has average headways of 15 to 20 minutes during the A.M. peak period and 12 to 15 minutes during the P.M. peak period.
- Metro Local 96 is a local line that travels from Chinatown to Burbank Station. This line operates between the hours of 5:00 A.M. and 9:30 P.M. and has average headways of 36 to 60 minutes during the A.M. peak period and 36 to 40 minutes during the P.M. peak period.
- Metro A Line is a rail line that travels from East Los Angeles to Downtown Los Angeles and Pasadena. This line operates between the hours of 3:30 A.M. and 1:30 A.M. and an average headway of 10 minutes during the A.M. and P.M. peak periods.
- Metro B Line is a rail line that travels from North Hollywood to Downtown Los Angeles. This line operates between the hours of 4:30 A.M. and 1:30 A.M. and an average headway of 10 minutes during the A.M. and P.M. peak periods.

- Metro D Line is a rail line that travels from Mid-Wilshire to Downtown Los Angeles. This line operates between the hours of 4:30 A.M. and 1:30 A.M. and an average headway of 10 minutes during the A.M. and P.M. peak periods.
- LADOT Commuter Express 409 is a local line that travels from East Glendale to Downtown Los Angeles. This line operates between the hours of 6:00 A.M. to 9:00 A.M. and 4:00 P.M. to 7:30 P.M. and has average headways of 18 minutes during the A.M. peak period and 30 minutes during the P.M. peak period.
- LADOT Commuter Express 419 is a local line that travels from Chatsworth to Downtown Los Angeles. This line operates between the hours of 5:30 A.M. to 9:30 A.M. and 3:30 P.M. to 8:30 P.M. and has average headways of 17 minutes during the A.M. peak period and 23 minutes during the P.M. peak period.
- LADOT DASH B is a local line that travels from Downtown Los Angeles to Chinatown and the Financial District. This line operates between the hours of 6:00 A.M. and 9:00 P.M. and has an average headway of eight minutes during the A.M. and P.M. peak periods.
- LADOT DASH Lincoln Heights/Chinatown is a local line that travels from Lincoln Heights to Chinatown. This line operates between the hours of 7:00 A.M. and 7:00 P.M. and has an average headway of 30 minutes during the A.M. and P.M. peak periods.
- Santa Clarita Transit 794 is an express line that travels from Downtown Los Angeles to Santa Clarita. This line operates between the hours of 7:00 A.M. to 8:00 A.M. and 4:30 P.M. to 6:30 P.M. with only one stop during the A.M. peak period and an average headway of 45 minutes during the P.M. peak period.
- Santa Clarita Transit 799 is an express line that travels from Santa Clarita to Downtown Los Angeles. This line operates between the hours of 5:00 A.M. to 8:30 A.M. and 3:30 P.M. to 8:00 P.M. and has an average headway of 27 minutes during the A.M. peak period and 39 minutes during the P.M. peak period.
- AVTA 785 is an express line that travels from Lancaster and Palmdale to Downtown Los Angeles. This line operates between the hours of 4:00 A.M. to 9:00 A.M. and 3:00 P.M. to 8:00 P.M. with an average headway of 23 minutes during the A.M. peak period and 20 minutes during the P.M. peak period.
- Torrance Transit 4X is an express line that travels from Torrance to Downtown Los Angeles. This line operates between the hours of 5:00 A.M. to 10:00 A.M. and 2:30 P.M. to 8:00 P.M. with average headways of 30 to 40 minutes during the A.M. peak period and 30 minutes during the P.M. peak period.

The Mobility Plan's TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the

surrounding street system. Within the Study Area, North Broadway, Cesar E. Chavez Avenue, and Main Street have been designated as part of the TEN.

(3) Existing Site Access and Parking

Existing access to the South Parcel is located via a gated driveway on North Broadway across from St. Peter's Italian Catholic Church as well as an existing easement from North Spring Street, which crosses under the elevated Metro A Line tracks at the southeastern corner of the South Parcel. The South Parcel currently contains paved surface parking areas. Access to the North Parcel is currently provided via two gated entryways along North Broadway, with one across from Solano Avenue and the other at the northeastern corner of the North Parcel. The North Parcel includes foundation remnants and graded areas, and is generally used for construction staging and bus parking.

(4) Existing Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

As discussed in the Transportation Assessment, along the Project Site frontages, generally 4-foot sidewalks are currently provided along North Broadway and widen near the bus stops located at Bishops Road and Solano Avenue to provide approximately 10 feet of pedestrian waiting area. Along Spring Street, near the Spring Street driveway, 10-foot-wide sidewalks provide adequate pedestrian connections. As illustrated in Figure 5 of the Transportation Assessment, pedestrian crossing facilities are provided at nearby signalized study intersections, including tactile warning strips for ADA accessibility, pedestrian push buttons, and crosswalks.

The Mobility Plan aims to promote walking to reduce the reliance on automobile travel by providing more attractive and pedestrian-friendly sidewalks, as well as adding pedestrian signalizations, street trees, and pedestrian-oriented design features. Adjacent to the Project Site, North Broadway and Spring Street are identified as part of the PED in the Mobility Plan.

(b) Bicycle Facilities

Based on the City's 2010 Bicycle Plan, the City's existing bicycle system consists primarily of bicycle lanes (Class II) and bicycle routes (Class III). Class II bicycle lanes are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. Class III bicycle routes and bicycle-friendly streets are those where motorists and cyclists share the roadway and there is no separated striping for bicycle travel. Bicycle routes and bicycle-friendly streets are preferably placed on Collector and lower volume Arterial Streets. Bicycle routes with shared lane markings, or "sharrows," remind bicyclists to ride farther from parked cars to prevent collisions, increases awareness of motorists that bicycles may be in the travel lane, and show bicyclists the correct direction of travel.

Currently, there are no bicycle routes provided adjacent to the Project Site. As detailed in the Transportation Assessment, there are a variety of Class II bicycle lanes and Class III bicycle routes within the Study Area, including along Stadium Way and Avenue 18.

Although there are no existing bicycle facilities adjacent to or near the Project Site, North Broadway and Spring Street have been identified as part of the Mobility Plan's BEN and BLN, respectively. In addition, the Project is located adjacent to areas subject to the Cornfield Arroyo Seco Specific Plan (CASP), which is currently undergoing updates. Consistent with the Mobility Plan, the CASP calls for bicycle lanes to be placed on both sides of the street on North Broadway and Spring Street along the Project frontages. All of the specific improvements detailed in the CASP are currently unfunded and there is no schedule for implementation.

(c) High Injury Network Facilities

As discussed above, Vision Zero has identified the HIN, a network of streets included based on collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. The Project Site is located adjacent to North Broadway, which is not part of the HIN along the Project frontages. North Broadway is identified in the HIN between College Street and Cesar E. Chavez Avenue. The following streets within the Study Area are also identified in the HIN and shown in Figure 8 of the Transportation Assessment:

- Hill Street between College Street and Cesar E. Chavez Avenue
- North Broadway east of Avenue 18 and between College Street and Cesar E. Chavez Avenue
- Alameda Street south of Alpine Street
- College Street between Yale Street and Spring Street
- Alpine Street between North Broadway and Alameda Street

LADOT has identified safety improvements (e.g., continental crosswalk upgrades, traffic signals, etc.) for implementation along corridors as part of the Vision Zero Safety Improvements projects. Projects within 0.25 miles of the Project Site include the North Broadway Safety Improvements project, wherein all identified safety components, such as traffic signal phasing for leading pedestrian intervals, traffic signals with night-time flashing yellow, intersection tightening strategies, continental crosswalks, and speed feedback signs, have already been implemented.

c. Future Without Project Transportation Conditions

As discussed in Section II, Project Description of the Draft EIR, construction of the Project would be phased, with development of the South Parcel occurring as Phase 1 and development of the North Parcel as Phase 2. Phase 1 is anticipated to start construction in 2028 and end in 2031. Phase 2 would be constructed soon after, or within a few years following completion of Phase 1, depending on market demand. For the purposes of providing a conservative analysis, Phase 2 is assumed to begin in 2031 after completion of Phase 1 and end in 2034. To account for future traffic conditions, the Transportation Analysis accounts for traffic associated with related projects as well as ambient growth. A list of related projects was prepared based on information provided by the Department of City Planning, LADOT, the City Bureau of Engineering (BOE), and the Los Angeles Department of Water and Power, as well as recent studies of projects in the area. The related projects are listed in Table III-1 and mapped in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. Although the buildout years of many of the related projects are uncertain and may well extend beyond the Project's anticipated buildout year, and notwithstanding that some may not ultimately be approved or developed, all related projects were assumed to be completed by the estimated 2034 Project buildout year for purposes of the traffic analysis. Therefore, the projected traffic growth resulting from the related projects is a conservative estimate that overestimates the actual traffic volume growth that would likely occur prior to the anticipated 2034 Project buildout year.

As detailed in the Supplemental Transportation Assessment, a one-percent annual growth factor compounded annually was applied to the existing traffic volumes to simulate Year 2031 and Year 2034 traffic volumes associated with buildout of Phase 1 and Phase 2, respectively. The transportation network within the Study Area could be affected by regional improvement plans, local specific plans, and programmed improvements implemented prior to full occupancy of the Project. Therefore, the analysis of Future Conditions accounts for roadway improvements that have been funded and are expected to be implemented prior to full occupancy of the proposed Project. Other proposed roadways improvement projects that are not funded and traffic/trip reduction strategies such as TDM programs for individual buildings and developments were omitted from the Future Conditions analysis. The recently completed and anticipated improvements within the Study Area are described below:

- **Metro Regional Connector**: The Metro Regional Connector project is a recently completed 1.90-mile underground light rail system located outside of the Study Area extending from the existing Metro A Line Little Tokyo/Arts District Station to the 7th Street/Metro Center Station in downtown Los Angeles. It includes three new transit stations, allowing passengers to make direct transfers between the A, E, B, and D Lines at the 7th Street/Metro Center Station, and provides additional connections for the Metro A Line to travel to Santa Monica via the current E Line route. Within the Study Area, the Metro Regional Connector project provides additional connections to travel to Azusa. The Metro Regional Connector

improves access to both local and regional destinations by providing continuous service between these lines and providing connectors to other rail lines at the 7th Street/Metro Center Station. Metro Regional Connector is underground and does not affect the at-grade street configurations; therefore, no changes to intersection lane configurations have been made to the Study Area as a result of the Metro Regional Connector project.

- Los Angeles State Historic Park Pedestrian Bridge: Los Angeles State Historic Park provides 32 acres of public open space and is located immediately east and south of the Project Site, adjacent to the Metro A Line. Currently, the only viable access to the park is provided along Spring Street. Studies are being conducted to review the addition of a pedestrian bridge connection to the park from North Broadway, which may require public access through the Project. The pedestrian bridge connection is anticipated to increase pedestrian activity along the adjacent North Broadway corridor. There is currently no dedicated funding or design of the future pedestrian bridge connection; therefore, no changes to intersection lane configurations have been made to the Study Area as a result of this proposed pedestrian bridge.
- Los Angeles Aerial Rapid Transit: The Los Angeles Aerial Rapid Transit (LA ART) is a proposed aerial rapid transit gondola system that would provide transit service to connect communities of El Pueblo, Mission Junction, Solano Canyon, and William Meade Homes. The proposed route would include stations at Union Station, Chinatown/Los Angeles State Historic Park, and Dodger Stadium. Although stations are not currently proposed along North Broadway, the LA ART is anticipated to increase pedestrian activity within the Study Area. The project is currently undergoing approval from state and local agencies; therefore, no changes to intersection lane configurations have been made in the Study Area as a result of the LA ART.
- Safe Routes for Seniors: The Safe Routes for Seniors (SR4S) program is community-driven and aims to “improve mobility, safety, comfort, and social connections for older adults.” Within the Study Area, Chinatown has been selected for further pedestrian safety improvements. At this time, no improvements have been identified; therefore, no changes to intersection lane configurations were made as a result of the SR4S program.
- Cornfield Arroyo Seco Specific Plan: While the Project Site is not located within the CASP, which is currently undergoing updates, the Project Site is adjacent to areas subject to the CASP. The CASP provides a general framework to transition the existing land use mix, which is primarily vehicle-oriented, to pedestrian and transit-oriented uses. As identified in the CASP, proposed transportation facilities improvements include traffic signals, continental crosswalks, and sidewalk extensions that would be located within the Study Area. Consistent with the Mobility Plan, the CASP calls for bicycle lanes to be placed on both sides of the street on North Broadway and Spring Street along the frontages of the Project Site. All of the specific improvements detailed in the CASP are currently unfunded and

there is no schedule for implementation; therefore, no changes to intersection lane configurations have been made in the Study Area as a result of the CASP.

- **Mobility Plan:** In the Mobility Plan, the City identifies key corridors as components of various “mobility-enhanced networks.” Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements that may be implemented in those networks have not yet been identified, and there is no schedule for implementation; therefore, no changes to intersection lane configurations were made as a result of the Mobility Plan. However, the following mobility-enhanced networks included corridors within the Project Site vicinity, which are depicted in Figure IV.M-2 above:
 - **Transit Enhanced Network (TEN):** As discussed above, the TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. North Broadway, Cesar E. Chavez Avenue, and Main Street have been designated as part of the TEN.
 - **Neighborhood Enhanced Network (NEN):** As discussed above, the NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. New High Street between Cesar E. Chavez Avenue and Ord Street, Spring Street between Cesar E. Chavez Avenue and Ord Street, Ord Street between New High Street and Alameda Street, Alpine Street between North Broadway and Main Street, College Street between North Broadway and Main Street, Llewellyn Street between Roundout Street and Main Street, West Ann Street between Spring Street and Main Street, Sotello Street between Spring Street and Main Street, Wilhardt Street between Spring Street and Main Street, Avenue 18 north of North Broadway, Avenue 19 south of North Broadway have been designated as part of the NEN.
 - **BEN/BLN:** North Broadway north of Cesar E. Chavez Avenue, Spring Street south of Ann Street, Main Street, Alpine Street/Vignes Street east of North Broadway, Avenue 19, and Pasadena Avenue have been designated as part of BEN. Pasadena Avenue, Avenue 18, and Spring Street north of Ord Street have been designated as part of the BLN.
 - **Pedestrian Enhanced District (PED):** As discussed above, Hill Street, North Broadway, New High Street, Spring Street, Main Street, Pasadena Avenue, Avenue 18, Alpine Street/Vignes Street east of Hill Street, and College Street west of Main Street are designated as part of the PED.

Per the City’s Los Angeles Safe Streets for All Initiative (Ordinance No. 188,198) adopted in April 2024, should the City make any improvement to a street segment of at least 1/8 of a mile in length, the street enhancements of the “mobility-enhanced networks” as

described above shall also be installed along that segment as part of the improvements undertaken by the City.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

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

b. Methodology

(1) Requirements for Transportation Assessments

As discussed above, in November 2018, the CNRA finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018, and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines 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 Guidelines Update* establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG in 2019 and most recently updated it in 2022. The analysis in this section and the Supplemental Transportation Assessment, included as Appendix K.2 of this Draft EIR.

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

As described above, the CEQA Guidelines Transportation Threshold (a) requires an analysis of a project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities.

Therefore, the impact analysis below evaluates the Project's potential to conflict with the applicable plans, programs, ordinances, and policies previously discussed. In accordance with the TAG, a project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. Specifically, an impact would not occur merely for an inconsistency with or a failure to implement, an adopted plan, program, ordinance, or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies. 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 physical impact on the environment.

(3) Vehicle Miles Traveled

(a) *VMT Impact Thresholds*

As part of evaluating a project's potential impacts under Threshold T-2.1 (VMT) of the TAG, LADOT's TAG establishes that a land use project may have a potential significant impact if the proposed project meets one or more of the following criteria:

- For residential projects, the project would generate daily household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located.
- For office projects, the project would generate daily work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC area in which it is located.
- For regional serving projects, including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT. Retail projects fewer than 50,000 square feet in size are considered local-serving and are assumed to have a negligible effect on VMT and are, therefore, not considered for the purposes of identifying significant VMT impacts. New retail uses greater than 50,000 square feet may also be considered local-serving if an applicant provides documentation that most of the vehicle trips would originate from the project area.

For mixed-use projects, the Project VMT impact should be considered significant if, after taking credit for internal capture, the Project's land use or land uses exceed any of the impact criteria set forth above.

Table 2.2-1 of the TAG identifies the daily household VMT per capita and daily work VMT per employee impact criteria (15 percent below the APC average) for the APCs. The Project Site is located within the Central APC and, therefore, according to Table 2.2-1 of the TAG, has a daily household VMT per capita threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6.

A project could have a significant cumulative impact on VMT if the project has both a significant project-level impact as determined above and is not consistent with the 2024–2050 RTP/SCS in terms of development location, density, and intensity.

(b) VMT Analysis Methodology

The following describes the methodology by which vehicle trips and VMT are calculated in City of Los Angeles VMT Calculator Version 1.4 (VMT Calculator),¹⁰ as detailed in the City of Los Angeles VMT Calculator Documentation.¹¹ LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits, which are based on the following types of one-way trips

- Home-Based Work Production: Trips to a workplace destination originating from a residential use;
- Home-Based Other Production: Trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use; and
- Home-Based Work Attraction: Trips from a workplace to a residential destination.

As detailed in the City of Los Angeles VMT Calculator Documentation, the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, while the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT as discussed in Appendix 1 of OPR’s Technical Advisory on Evaluating Transportation Impacts in CEQA.

Other types of trips generated in the VMT Calculator include Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use), Home-Based Other Attraction (trips to a non-workplace destination originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination

¹⁰ Los Angeles Department of Transportation, *City of Los Angeles VMT Calculator, Version 1.4, June 2023*.

¹¹ Los Angeles Department of Transportation and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*.

originating from a non-residential use). These trip types are not factored into the VMT per capita and VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, those trips are factored into the calculation of total project VMT for screening purposes when determining if VMT analysis would be required.

(i) Travel Behavior Zone

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

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

The VMT Calculator determines a project's TBZ based on the latitude and longitude of a project site address. The Project Site is located in a Compact Infill TBZ (Zone 3).

(ii) Mixed-Use Development Methodology

As detailed in the VMT Calculator Documentation, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following socio-demographic, land use, and built environment factors for a project area:

- The project location's jobs/housing balance, which factors into how many trips are local or internal to a mixed-use project
- Land use density where the project is located, which factors into the likelihood of short trips, as well as walking and bicycling
- Transportation network connectivity, which affects the circuitry of travel (whether driving, walking, or bicycling) and, therefore, affects both trip length and the likelihood of choosing non-automobile modes of travel

- Proximity to transit, which affects the likelihood that residents or employees will travel via transit rather than automobile
- Proximity to retail and other destinations, affecting the likelihood that residents or employees will take short trips or non-automobile modes for routine commercial activities
- Vehicle ownership rates, with higher levels of vehicle ownership leading to a higher rate of automobile trips
- Household size, which affects both the number of trips made by a given residential unit (increasing or decreasing overall VMT) and the number of people when calculating the daily VMT per capita

(iii) Trip Lengths

The VMT Calculator determines a project's VMT based on the trip length information from the City's Travel Demand Forecasting (TDF) Model, which considers the traffic analysis zone within 0.125 miles of a project to determine the trip length and trip type, which factor into the calculation of a project's VMT.

(iv) Population and Employment Assumptions

The VMT Calculator contains population assumptions based on Census data and employment assumptions derived from multiple data sources, including the *2012 Developer Fee Justification Study* (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, *Trip Generation Manual, 9th Edition* (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling resources.¹² A summary of the population and employment assumptions for various land uses is provided in Table 1 of the *City of Los Angeles VMT Calculator Documentation*.

(v) Transportation Demand Management Strategies

The VMT Calculator also measures the reduction in VMT resulting from a project's incorporation of TDM measures as regulatory compliance (per Section 12.26 G of the LAMC), and strategies as project design features or mitigation measures. The following seven categories of TDM strategies are included in the VMT Calculator:

1. Parking

¹² *The 2024 LAUSD Developer Fee Justification Study and Trip Generation Manual, 11th Edition are now available; however, the City's VMT Calculator utilized the editions indicated herein.*

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

TDM strategies or measures within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented by the California Air Pollution Control Officers Association in the report *Quantifying Greenhouse Gas Mitigation Measures*.¹³

(4) Hazardous Design Features

(a) Geometric Design Feature and Incompatible Uses Analysis

TAG Threshold T-3 requires that the determination of significance should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design), while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions like curves or grade changes, and a project's proximity to streets identified in the HIN or the Safe Routes to School program. Significance may be determined qualitatively or quantitatively as best suits the circumstances of each project. If a significant impact is identified, mitigation measures may include installation of new traffic control devices, redesign or relocation of access points, turn restrictions, pavement markings, or vehicular demand management.

(b) Freeway Safety Analysis

TAG Threshold T-3 requires that a transportation assessment for a development project should include an analysis of nearby freeway off-ramps serving a project site where a project adds 25 or more morning or afternoon peak-hour trips. A project would result in a significant impact at such a ramp if each of the following three criteria is met:

¹³ California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*, August 2010.

1. Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes.
2. The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
3. The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 miles per hour (mph).

If a potential safety issue is identified, then to offset this condition, a project should consider preferred corrective measures, including TDM strategies, to reduce the project's trip generation, investments in active transportation or transit system infrastructure to reduce the project's trip generation, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to a ramp would have to demonstrate substantial safety benefits and cannot be a VMT-inducing improvement or result in environmental impacts.

(5) Emergency Access

In consultation with the Los Angeles Fire Department (LAFD), analysis of a project's potential access impacts must include a review of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination is then made pursuant to the thresholds of significance identified above regarding the potential for these types of project features to impede emergency access on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would include the Project Design Features set forth below. Project Design Feature TR-PDF-2 below includes numerous TDM strategies. However, the VMT analysis conservatively considered only those TDM measures required by the LAMC.

Project Design Feature TR-PDF-1: A detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval, prior to commencing construction. The Construction Traffic Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including duration and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets or in predominantly residential zoned areas.
- Temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people) during all construction activities adjacent to North Broadway and Spring Street, to ensure traffic safety on the public right-of-way.
- Scheduling of construction-related activities to reduce the effect on traffic flow and surrounding arterial streets.
- Coordination with Metro and LADOT to address any transit stop modifications or relocations.
- Coordination with LADOT Parking Meter Division to address any potential loss of metered parking spaces, if needed.
- Implementing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.
- Prohibition of construction-related vehicles/equipment staging on adjacent streets, unless specifically approved as a condition of an approved haul route.
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities and posting of the telephone number at the site readily visible to any interested party during site preparation, grading, and construction.

Project Design Feature TR-PDF-2: The Project will implement various TDM strategies that would exceed the requirements established in the current TDM Ordinance. The TDM Program will be subject to review and approval by the City. The following TDM strategies will be implemented as proposed under the TDM Program in addition to the TDM measures required under the TDM ordinance:

- Reduced Parking Supply: The Project will incorporate allowable parking reduction rates from standard LAMC requirements such as LAMC Sections 12.21.A4(x)(3) and LAMC Section 12.21.A4. The Project will provide up to a total of 1,477 parking spaces, including

up to 931 spaces on the South Parcel and 546 spaces on the North Parcel, which is less than the standard baseline LAMC requirements of 1,889 total spaces, including 1,207 spaces for the South Parcel and 682 spaces for the North Parcel.

- **Pedestrian Amenities:** The Project will provide upgraded pedestrian facilities including wider (seven-foot wide) sidewalks and landscape corridors along North Broadway. Furthermore, the Project will implement a pedestrian wayfinding signage system to direct residents, employees, and visitors of the Project to available transit services and other attractions within the vicinity of the Project Site.
- **Neighborhood Enhancements:** The Project will provide new or updated pedestrian crosswalks at the signalized driveway to the North Parcel, and a new signalized pedestrian beacon for a crosswalk across North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park.
- **Transit Infrastructure Improvements:** The Project will coordinate with the appropriate agencies to provide improvements to existing transit infrastructure (e.g., adequate benches, shelters, lighting, light emitting diode displays, signage, etc.) at the bus stops located immediately adjacent to the Project Site along North Broadway, as needed.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Table 2.1-2 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: Mobility Plan; Central City North Community Plan; Plan for a Healthy Los Angeles; the LAMC; Vision Zero, Citywide Design Guidelines, and SCAG's 2024–2050 RTP/SCS. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

(a) Mobility Plan

As discussed above, the Mobility Plan combines “complete street” principles with the following five goals that define the City's mobility priorities:

1. **Safety First**: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.
2. **World Class Infrastructure**: A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. **Access for All Angelenos**: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
4. **Collaboration, Communication, and Informed Choices**: The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. **Clean Environments and Healthy Communities**: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Mobility Plan further enumerates a variety of policies and programs in support of these goals. The Mobility Plan policies that are applicable to the Project along with a corresponding discussion of the Project's consistency with such policies are provided in Table IV.M-1 on page IV.M-36.

As previously described, the Mobility Plan identifies key corridors within the Study Area as components of various "mobility-enhanced" networks, including the TEN, NEN, PED, and BEN/BLN. The mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. As demonstrated in Table IV.M-1 and discussed further below, the Project would support the City's overarching objective of the mobility-enhanced networks to improve mobility.

The Mobility Plan also designates street and sidewalk width standards based on a street's functional classification. The Project frontage is bordered by North Broadway to the west, which is a designated Avenue II in the Mobility Plan. The existing half right-of-way width of 40 feet does not meet the Mobility Plan standards of 43 feet. A 3-foot dedication along the Project frontage on North Broadway would be provided to meet the half right-of-way requirements and widen the sidewalks to seven feet. Though this would remain narrower than the 15-foot standard in the Mobility Plan, it would exceed the existing sidewalk width of four feet. If required by the City, the sidewalk width could be further widened by reducing the roadway width accordingly. No additional dedication or widening is required,

**Table IV.M-1
Project Consistency With Mobility Plan 2035**

Objective, Policy, Program, or Plan	Analysis of Project Consistency
Chapter 1: Safety First	
<p><u>Policy 1.1 Roadway User Vulnerability</u> Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.</p>	<p>No Conflict. The Project would include pedestrian enhancements within and along the frontage of the Project Site, which would include wider pedestrian sidewalks on the east side of North Broadway, connections to pedestrian walkways, publicly accessible promenades, courtyards, and plazas, and a landscaped Central Greenspace connecting the North and South Parcels. The Project would provide a signalized crosswalk across North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park. Pedestrian and bicycle access to the Project Site would be provided via entrances along North Broadway. All improvements within the public right-of-way would be designed and completed in consultation with LADOT, or other agencies, and in compliance with standard guidelines.</p>
<p><u>Policy 1.2 Complete Streets</u> Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.</p>	<p>No Conflict. The Project would conform to all design element requirements which may affect public rights-of-way, including proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility. The Project would also provide a 3-foot dedication on North Broadway along the Project frontage to widen the pedestrian sidewalk, which would help to facilitate pedestrian accessibility and improve the safety and mobility of all users.</p>
<p><u>Policy 1.3 Safe Routes to Schools</u> Prioritize the safety of school children on all streets regardless of highway classifications.</p>	<p>No Conflict. Castelar Elementary School is located approximately 1,100 feet southwest of the Project Site. The Safe Routes to School program for Castelar Elementary School identifies most of the striped crosswalks within the Study Area south of Bernard Street as "recommended crossing" locations. The Project would not impede the continued operation of these crossings.</p>
<p><u>Policy 1.6 Multi-Modal Detour Facilities</u> Design detour facilities to provide safe passage for all modes of travel.</p>	<p>No Conflict. The Project would prepare and implement a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1 that would include detour routes for all applicable travel modes, including pedestrian and transit users, and any impediments to the public right-of-way during construction.</p>
Chapter 2: World Class Infrastructure	
<p><u>Policy 2.2 Complete Streets Design Guide</u> Establish the Complete Streets Design Guide as the City's document to guide the operations and design of streets and other public rights-of-way.</p>	<p>No Conflict. The Project would conform to all design element requirements which may affect public right-of-way, including proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design that would not hinder sight distance, mobility, or accessibility.</p>
<p><u>Policy 2.3 Pedestrian Infrastructure</u></p>	<p>No Conflict. North Broadway along the Project Site has been identified as part of the PED. The Project would enhance pedestrian access within and around the Project Site by</p>

Table IV.M-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
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.	providing connections to pedestrian walkways, publicly accessible promenades, courtyards, and plazas, and a landscaped Central Greenspace. The Project would provide a 3-foot dedication on North Broadway to widen the pedestrian sidewalk. Separate pedestrian entrances from vehicular driveways to the Project Site would also be provided. All driveways would be designed to provide an adequate pedestrian refuge area between the driveways where necessary. Furthermore, as included in Project Design Feature TR-PDF-2 the Project would provide a signalized crosswalk consistent with LADOT standards, across North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park.
<p><u>Policy 2.4 Neighborhood Enhanced Network</u></p> <p>Provide a slow speed network of locally serving streets.</p>	No Conflict. No adjacent roadways have been identified as part of the NEN, but portions of nearby roadways, including Alpine Street and College Street, are a part of the network. The Project would not impede the development of any future improvements to effectuate the NEN on these roadways.
<p><u>Policy 2.5 Transit Network</u></p> <p>Improve the performance and reliability of existing and future bus service.</p>	No Conflict. North Broadway along the Project Site has been identified as part of the TEN. The Project would continue to provide vehicular access along this roadway. The proposed driveway at Solano Avenue would affect a portion of the existing curb extension that serves as a pedestrian waiting area for the adjacent bus stop. Any necessary adjustments to the bus stop would be coordinated with Metro and LADOT to ensure that bus operations would not be affected. Furthermore, the Project would not preclude future improvements to existing and future transit services or operations. The Project would encourage more transit usage by developing a major mixed-use project with convenient access to nearby rail and bus transit services.
<p><u>Policy 2.6 Bicycle Networks</u></p> <p>Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities. (includes scooters, skateboards, rollerblades, etc.)</p>	No Conflict. North Broadway along the Project Site has been identified as part of the BEN. The Project would continue to provide vehicular access along this roadway. The Project would not preclude any future implementation of bicycle infrastructure. The Project would provide on-site bicycle parking to encourage bicycling for residents, employees, and visitors to the Project Site.
<p><u>Policy 2.9 Multiple Networks</u></p> <p>Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities. (includes scooters, skateboards, rollerblades, etc.)</p>	No Conflict. Refer to Response to Policies 2.4 through 2.6, above. As detailed therein, the Project vicinity includes a mix of enhanced networks identified as part of the Mobility Plan. The Project would improve the overall pedestrian experience surrounding the Project Site and would not conflict with the City's bicycle plans as identified in the Mobility Plan
<p><u>Policy 2.10 Loading Areas</u></p>	No Conflict. The Project would provide loading docks on-site, including two locations on the South Parcel and one location on the North Parcel. The loading docks would be designed to

Table IV.M-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
Facilitate the provision of adequate on and off-street loading areas.	meet the Project Site loading needs without disrupting operations within the public right-of-way.
<p><u>Policy 2.17 Street Widening</u></p> <p>Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.</p>	<p>No Conflict. The Project would provide a 3-foot dedication on North Broadway to meet the Mobility Plan half right-of-way requirements, which would widen the pedestrian sidewalk. The Project does not propose any waivers of required dedication or improvements.</p>
Chapter 3: Access for All Angelenos	
<p><u>Policy 3.1 Access for All</u></p> <p>Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.</p>	<p>No Conflict. The Project would encourage multi-modal transportation alternatives and access for all travel modes to and from the Project Site. The Project would provide separate pedestrian entrances and would provide on-site bicycle parking and amenities to encourage walking and bicycling. The Project would encourage transit usage by developing a mixed-use project located in proximity to transit. The Project would support those residents, employees, and visitors who choose to travel by automobile through the provision of driveways along North Broadway and from Spring Street to the parking garages and on-site commercial loading.</p>
<p><u>Policy 3.2 People with Disabilities</u></p> <p>Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>	<p>No Conflict. The Project would be designed consistent with all requirements from the ADA and would provide direct connections to pedestrian amenities at adjacent and nearby intersections.</p>
<p><u>Policy 3.3 Land Use Access and Mix</u></p> <p>Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p>No Conflict. The Project would develop high-density residential and commercial uses and promote jobs/housing balance within close proximity to employment, commercial, and cultural destinations, and local-serving retail and restaurants in an urbanized area of the City. The Project's as well as the surrounding mix of land uses would encourage ridesharing and use of alternative transportation modes to minimize vehicle trips. The Project would support initiatives to create transit-oriented developments as it would develop an infill site located adjacent to and near multiple transit services. Additionally, the Project would implement TDM strategies that would further reduce the number of single occupancy vehicle trips to the Project Site.</p>
<p><u>Policy 3.5 Multi-Modal Features</u></p> <p>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</p>	<p>No Conflict. The Project would support "first-mile, last-mile solutions" by developing a mixed-use project located in an active urban area near major transit stops and local and rapid bus stops. Additionally, the Project would implement a TDM Program pursuant to Project Design Feature TR-PDF-2 to encourage residents, employees, and visitors to the Project</p>

Table IV.M-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
(transit stops) to maximize multi-modal connectivity and access for transit riders.	Site to use alternative modes of transportation. The TDM Program would include, a reduced parking supply, pedestrian amenities, neighborhood enhancement, transit infrastructure improvements and bicycle parking which would encourage the use of transit, and reduce total VMT and single occupant vehicle (SOV) dependency.
<p><u>Policy 3.7 Regional Transit Connections</u></p> <p>Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.</p>	<p>No Conflict. The Project would improve access between transit and major regional destinations by developing a mix of high-density residential and commercial uses and promoting jobs/housing balance in an urban area near transit. Furthermore, the proposed residential and commercial uses would help to create more housing opportunities as well as contribute to the creation of more jobs within a regional center, including Chinatown directly adjacent to Union Station.</p>
<p><u>Policy 3.8 Bicycle Parking</u></p> <p>Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.</p>	<p>No Conflict. The Project would provide 80 short-term and 722 long-term bicycle parking spaces to encourage bicycling for residents, employees, and visitors to the Project Site.</p>
<p>Chapter 4: Collaboration, Communication, & Informed Choices</p>	
<p><u>Policy 4.1 New Technologies</u></p> <p>Support new technology systems and infrastructure to expand access to transportation choices.</p>	<p>No Conflict. The Project would leverage new technology systems and infrastructure by incorporating a pedestrian wayfinding signage system and real-time transit information via digital bulletin boards so that residents, employees, and visitors can be informed of the available transportation choices.</p>
<p><u>Policy 4.8 Transportation Demand Management Strategies</u></p> <p>Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.</p>	<p>No Conflict. The Project's TDM program set forth in Project Design Feature TR-PDF-2 includes the following measures, a reduced parking supply, pedestrian amenities, neighborhood enhancement, transit infrastructure improvements and bicycle parking which would encourage the use of transit, reduce total VMT and SOV dependency.</p>
<p><u>Policy 4.14 Wayfinding</u></p> <p>Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms.</p>	<p>No Conflict. The Project would include marketing activities, including printed/posted materials and digitally distributed information, to ensure that residents, employees, and visitors at the Project Site are aware of all mobility options available on-site and in the surrounding area. The Project would implement a pedestrian wayfinding signage system along any publicly accessible internal walkways to direct pedestrians to the Metro A Line Chinatown Station.</p>
<p>Chapter 5: Clean Environments & Healthy Communities</p>	
<p><u>Policy 5.1 Sustainable Transportation</u></p>	<p>No Conflict. The Project would encourage sustainable transportation by providing on-site bicycle parking facilities and separate pedestrian entrances, both of which would promote active transportation modes such as biking and walking. Furthermore, the Project is located within close</p>

Table IV.M-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
Encourage the development of a sustainable transportation system that promotes environmental and public health.	proximity to nearby transit stops serviced by rail and bus lines providing residents, employees, and visitors to the Project Site with public transportation alternatives. In addition, the Project would provide electric vehicle (EV) parking and charging stations in compliance with applicable LAMC requirements.
<p>Policy 5.2 Vehicle Miles Traveled (VMT)</p> Support ways to reduce vehicle miles traveled (VMT) per capita.	<p>No Conflict. The Project is estimated to generate lower VMT per capita than the average for the area, as demonstrated further below in this section. Furthermore, the Project would implement a TDM Program pursuant to Project Design Feature TR-PDF-2 to encourage residents, employees, and visitors to the Project Site to use alternative modes of transportation.</p>
<p>Policy 5.4 Clean Fuels and Vehicles</p> Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.	<p>No Conflict. The Project would provide EV parking and charging stations in compliance with applicable LAMC requirements to accommodate those who arrive in EVs, which would promote the usage of EVs and thereby producing less GHG emissions compared to non-electric vehicles.</p>
<p>^a Objectives, Policies, Programs, or Plans based on information provided in Mobility Plan 2035: An Element of the General Plan (Los Angeles Department of City Planning, January 2016). Source: Gibson Transportation Consultants, August 2024 and April 2022.</p>	

and no Waivers of Dedication are requested. The Project would also include new driveways along North Broadway; however, the new curb cuts would not alter the identifying design characteristics of North Broadway and the number of curb cuts along North Broadway would be reduced when compared with existing conditions. Because the majority of the Project Site has access only to North Broadway, there are no alternatives to driveways along North Broadway. In addition, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure. As previously discussed, North Broadway has been identified as part of the Mobility Plan's TEN, BEN, and PED. The Project would not preclude or prohibit any future access improvements proposed in the Mobility Plan. The Project would also provide vehicular access from North Spring Street, a designated Modified Avenue I in the Mobility Plan.

The Project supports initiatives to create transit-oriented developments by developing a high density mixed-use development located in an active commercial area near Chinatown and within proximity of the Metro A Line Chinatown Station, which provides a direct rail connection to Union Station. The Project's proposed residential and commercial uses would enhance connection to Union Station, minimize vehicle trips, and enhance proximity and convenience of residences to jobs and services. With development of the Project, North Broadway along the Project frontage would be improved to provide wider pedestrian

sidewalks and a landscaped space to create a walkable and attractive pedestrian environment. Pedestrian and bicycle access separate from vehicle access would be provided and would connect to the internal pedestrian walkways to reduce potential conflicts with vehicle traffic. In addition, as discussed above, to provide accessibility to City public recreational trails, the Project would provide a signalized high visibility pedestrian beacon for a crosswalk along North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park.

Furthermore, the Project would implement and promote TDM strategies to reduce the dependency on single-occupancy vehicles and encourage the use of transit and other alternative modes of transportation. The Project's TDM program would reduce vehicle trips and result in lower VMT per capita compared to the average for the area as demonstrated in the analysis further below.

Based on the above, including the detailed analysis provided in Table IV.M-1 on page IV.M-36, the Project would not conflict with the Mobility Plan.

(b) Central City North Community Plan

A detailed analysis of the Project's potential to conflict with the transportation-related policies set forth in the Community Plan is provided in Table IV.M-2 on page IV.M-42. As detailed therein, the Project would expand housing opportunities near accessible transit, encourage commercial development opportunities, and provide publicly accessible landscaped spaces that would serve the recreational, environmental and health needs of the surrounding community. The Project would enhance pedestrian activity by generally locating commercial uses on the ground floor of the Project Site with frontage along North Broadway and would encourage bicycle activity through the provision of 80 short-term and 722 long-term bicycle parking spaces on-site. The Project would include a Central Greenspace in the central portion of the Project Site connecting the North Parcel and the South Parcel as well as the planting of street trees and other landscaped elements along North Broadway. The Project would also provide a new signalized pedestrian beacon for a crosswalk across North Broadway to Elysian Park. In addition, the Project would provide wider sidewalks of 7 feet on North Broadway along the frontage of the Project Site. Furthermore, the Project would implement a TDM Program that would encourage residents, employees, and visitors of the Project Site to utilize alternative modes of travel. Therefore, as demonstrated by Table IV.M-2, the Project would not conflict with the transportation-related goals and objectives of the Community Plan.

**Table IV.M-2
Project Consistency With the Central City North Community Plan^a**

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
Policy 10-1.2: Encourage the provision of safe, attractive and clearly identifiable transit stops with user friendly design amenities.	No Conflict. There are two existing bus stops located along North Broadway adjacent to the Project Site. In coordination with LADOT and Metro, reconfiguration and/or relocation may occur at the existing bus stop along North Broadway at Solano Avenue and the Project driveway. Reconfiguration and/or relocation of the existing bus stop would meet current Metro and LADOT standards related to design and identification. Furthermore, the Project would not preclude future implementation of any other transit stop improvements in the Project vicinity.
Policy 11-1.1: Install ATSAC equipment at an accelerated rate with expanded funding.	No Conflict. The majority, if not all, signalized intersections within the City are currently equipped with both Advanced Transportation System and Coordination (ATSAC) and Adaptive Traffic Control System (ATCS). The Project would not preclude any future intersection improvements in the Project vicinity.
Policy 12-1.1: Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.)	No Conflict. The Project would implement a TDM Program (inclusive of the applicable TDM measures as required by the existing TDM Ordinance and TDM strategies included within Project Design Feature TR-PDF-2) to encourage residents, employees, and visitors to the Project Site to use alternative modes of transportation.
Policy 12-1.3: Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	No Conflict. Although the Project is primarily comprised of residential uses, the Project would submit a TDM Program to the City for approval. The Project's TDM measures as required by the existing TDM Ordinance (LAMC 12.26 G) include displaying local transit information to promote and market alternative transportation modes and choices. Additionally, the Project would implement TDM strategies that would exceed the applicable requirements established in the TDM Ordinance by implementing Project Design Feature TR-PDF-2 which includes: a reduced parking supply, pedestrian amenities, neighborhood enhancements, and transit infrastructure improvements.
Policy 12-1.4: TDM measures in Central City North should be consistent with adopted City policy.	No Conflict. The proposed TDM Program (inclusive of the applicable TDM measures as required by the existing TDM Ordinance and TDM strategies included within Project Design Feature TR-PDF-2) would be consistent with adopted City policy.
Policy 13-1.4: Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public spaces.	No Conflict. Although the Project would primarily be comprised of residential uses, the Project would provide 80 short-term and 722 long-term bicycle parking spaces as well as bicycle storage.
Policy 13-2.1: Encourage the safe utilization of easements and/or rights-of-way along flood channels, public utilities, railroad rights-of-way, and streets wherever	No Conflict. The Project would provide a 3-foot dedication on North Broadway along the frontage of the Project Site to provide wider pedestrian sidewalks.

Table IV.M-2 (Continued)
Project Consistency With the Central City North Community Plan

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
feasible for the use of bicycles and/or pedestrians.	
Policy 13-2.2: Require the installation of sidewalks with all new roadway construction and significant reconstruction of existing roadways.	No Conflict. The Project would provide a 3-foot dedication on North Broadway along the frontage of the Project Site to provide wider pedestrian sidewalks.
Policy 14-1.1: Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto the arterial.	No Conflict. Vehicular access to and from the parking garages would be provided on the South Parcel from North Broadway, three driveways on the North Parcel from North Broadway, and one driveway on the South Parcel from North Spring Street located beneath the elevated Metro A Line tracks.
Policy 14-1.2: New parking lots and garages shall be developed in accordance with design standards.	No Conflict. The parking garage and driveways would be designed in compliance of standard guidelines.
<p>^b Central City North Community Plan, Los Angeles Department of City Planning, 2001. Source: Gibson Transportation Consultants, August 2024 and April 2022, Eyestone Environmental, 2025.</p>	

(c) Plan for a Healthy Los Angeles

A detailed analysis of the Project's potential to conflict with the policies in the Plan for a Healthy Los Angeles related to transportation is provided in Table IV.M-3 on page IV.M-44. As discussed in detail therein, the Project would prioritize safety and access for all individuals utilizing the Project Site. The Project would support healthy lifestyles by locating housing and jobs near transit, providing bicycle parking, and enhancing the pedestrian environment through wider pedestrian sidewalks on the east side of North Broadway, connections to pedestrian walkways, publicly accessible promenades, courtyards, and plazas, and a landscaped Central Greenspace connecting the North Parcel and the South Parcel. The Project would encourage bicycling and walking by enhancing the pedestrian experience and providing better connections to existing transit stops. In addition, the Project would provide up to 38,800 square feet of commercial space inclusive of 23,800 square feet of restaurant space and 15,000 square feet of retail space that would be easily accessible by foot from surrounding residential neighborhoods. The Project would also include affordable housing units to provide attainable opportunities for social mobility and would not displace existing housing; rather, the Project would convert a largely vacant site into an active and vibrant mixed-use community with a high-density residential component and local-serving commercial space. Furthermore, as discussed under Threshold (b) below, the Project is estimated to generate lower VMT per capita than average

**Table IV.M-3
Project Consistency With Plan for a Healthy Los Angeles**

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
Chapter 1: Los Angeles, a Leader in Health and Equity	
<p>Policy 1.5 Plan for Health</p> <p>Improve Angelenos’ health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.</p>	<p>No Conflict. The Project is a mixed-use Project located on an infill site that is well served by transit. The Project provides 80 short-term and 722 long-term bicycle parking spaces to encourage bicycling for residents, employees, and visitors to the Project Site. As such, the Project would encourage the use of active travel modes and thereby promote healthy living. The Project would also provide pedestrian enhancements around the Project Site, including wider pedestrian sidewalks on the east side of North Broadway, connections to pedestrian walkways, publicly accessible promenades, courtyards, and plazas, and a landscaped Central Greenspace. The Project would also provide a signalized crosswalk along North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park.</p>
Chapter 2—A City Built for Health	
<p>Policy 2.1 Access to Goods and Services</p> <p>Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.</p>	<p>No Conflict. In addition to affordable housing units, the Project would provide employment and entrepreneurial opportunities through the development of approximately 38,800 square feet of commercial space inclusive of 23,800 square feet of restaurant space and 15,000 square feet of retail space primarily on the ground level of the Project Site that would be easily accessible by foot from surrounding residential neighborhoods. The Project does not displace any existing housing; rather it would convert a largely vacant site into an active mixed-use community with a high-density residential component.</p>
Chapter 5—An Environment Where Life Thrives	
<p>Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction</p> <p>Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.</p>	<p>No Conflict. The Project is estimated to generate lower VMT per capita than average for the area, as demonstrated in the analysis further below under Threshold (b). Furthermore, the Project would incorporate a TDM Program (inclusive of the applicable TDM measures as required by the existing TDM Ordinance and TDM strategies included within Project Design Feature TR-PDF-2) to further reduce the number of single occupancy vehicle trips to the Project Site and VMT per capita. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.</p>
<p>^a Objectives, Policies, Programs, or Plans based on information provided in Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Los Angeles Department of City Planning, March 2015). Source: Gibson Transportation, August 2024 and April 2022.</p>	

for the area. Therefore, the Project would not conflict with, and would not obstruct the implementation of the policies set forth in, the Plan for a Healthy Los Angeles.

(d) Los Angeles Municipal Code

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. The Project would provide 80 short-term and 722 long-term bicycle parking spaces for a total of 802 bicycle parking spaces. The proposed short-term and long-term bicycle parking spaces would meet the LAMC requirements for the Project. Therefore, the Project is consistent with LAMC Section 12.21.A.16.

LAMC Section 12.26 G (a), of the TDM Ordinance, establishes TDM requirements for non-residential projects, in addition to non-residential components of mixed-use projects, in excess of 25,000 square feet, including the Project. Applicable requirements of LAMC Section 12.26 G (a) of the TDM Ordinance include providing a bulletin board or display case of transportation information. Additionally, the Project would implement TDM strategies that would exceed the applicable requirements established in the TDM Ordinance by implementing Project Design Feature TR-PDF-2 which includes: a reduced parking supply, pedestrian amenities, neighborhood enhancements, and transit infrastructure improvements.

LAMC Section 14.4.5 A states that no sign or sign support structure shall be erected, constructed, painted or maintained, and no permit shall be issued if the sign or sign support structure, because of its location, size, nature or type, constitutes a hazard to the safe and efficient operation of vehicles upon a street or a freeway or creates a condition that endangers the safety of persons or property. The Project's signage visible from the surrounding roadways would comply with this requirement, and the Project would not conflict with LAMC Section 14.4.5.A.

Based on the above, the Project would meet the applicable LAMC requirements.

(e) Vision Zero

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The Project Site is located along North Broadway, which is not part of the HIN along the frontages of the Project Site where the proposed driveways are located. South of the Project Site, North Broadway has been identified in the HIN between College Street and Cesar E. Chavez Avenue. As of June 2019, LADOT installed safety improvements along 1.5 miles of North Broadway between Spring Street and Mission Road as part of the North Broadway Safety Improvements project. Improvements include traffic signal phasing for leading pedestrian intervals, traffic signals with night-time flashing yellow, intersection tightening strategies, continental crosswalks, and speed feedback signs. All City improvements have been installed and no further improvements are planned as part of Vision

Zero. The Project improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Therefore, the Project would not conflict with Vision Zero.

(f) Citywide Design Guidelines

As discussed in Section IV.I, Land Use and Planning, of this Draft EIR, the Citywide Design Guidelines are intended as performance goals and not strict regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all are appropriate in every case. As detailed below, the Project would not conflict with the following applicable Citywide Design Guidelines related to transportation:

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

With respect to Guidelines 1 and 3, the Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, the Project would provide a 3-foot dedication on North Broadway along the frontage of the Project Site to provide wider pedestrian sidewalks. Additionally, the Project would provide connections to pedestrian walkways, publicly accessible promenades, courtyards, and plazas, and a landscaped Central Greenspace connecting the North Parcel and the South Parcel. The Project would install a new signalized pedestrian crosswalk across North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park. The adjacent sidewalk would be lined with street trees and landscaping elements to provide adequate shade and create a more comfortable environment for pedestrians. Furthermore, the orientation of the Project design with active ground floor uses would ensure that the Project actively engages with the street and the surrounding uses.

With regard to Guideline 2, the Project would also include pedestrian-only entrances separate from vehicular access points to minimize potential vehicle-pedestrian conflicts. Specifically, primary pedestrian access to the Project Site would be from North Broadway and North Spring Street for the South Parcel, and North Broadway for the North Parcel. Furthermore, the Project would incorporate pedestrian safety features along all driveways, and all Project driveway designs would be subject to the approval of the LADOT and Los

Angeles Bureau of Engineering. The Project also includes pedestrian enhancements as discussed above.

Based on the above, the Project would not conflict with Citywide Design Guidelines related to transportation.

(g) Other Plans and Policies

As discussed in detail in Section IV.I, Land Use and Planning, of this Draft EIR, the Project would not conflict with SCAG's 2024–2050 RTP/SCS policies to encourage pedestrian activity and reduce VMT. As indicated therein, the Project would improve mobility and accessibility, encourage transit use, and reduce VMT and GHG emissions by intensifying urban density within a SCAG-designated Priority Development Area (PDA) (i.e., [Neighborhood Mobility Area] NMA and Livable Corridor) as well as a HQTC in proximity to transit and destinations; providing complementary new uses (i.e., multi-family residential and commercial uses) in proximity to other existing residential, office, retail, restaurant, and hotel uses; providing pedestrian and bicycle improvements; and implementing TDM measures and strategies to reduce single-occupant travel. The Project would also support healthy and equitable communities by encouraging walking and bicycling, providing EV charging stations, facilitating a reduction of VMT and air pollution, and providing public realm improvements (i.e., widened sidewalks, new street trees and landscaping).

Furthermore, because the Project would be located within a SCAG-designated PDA (i.e., NMA and Livable Corridor) as well as a HQTC and in an area well-served by Metro rail and various local bus lines, the Project would contribute to the productivity and use of the regional transportation system. The Project would provide housing, employment, and local-serving uses near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with the 2024–2050 RTP/SCS goals. Thus, the Project would encourage a variety of transportation options and would be consistent with the 2024–2050 RTP/SCS goal of maximizing mobility and accessibility in the region while at the same time reducing VMT and GHG emissions.

In summary, the Project would not conflict with applicable transportation-related goals, objectives and policies of SCAG's 2024–2050 RTP/SCS.

(h) Conclusion

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

(2) Mitigation Measures

Project-level impacts related to the consistency with adopted City plans, programs, ordinances and policies regarding the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the consistency with adopted City plans, programs, ordinances, and policies regarding circulation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As discussed above, Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

LADOT'S VMT Calculator was used to evaluate Project VMT for comparison to the VMT impact criteria. The VMT Calculator was modeled for the South Parcel and North Parcel separately with the proposed land uses and density of each parcel as the primary inputs. As described in detail in the Supplemental Transportation Assessment, per the TAG, the proposed commercial uses totaling approximately 38,800 square feet under the Project are less than 50,000 square feet and are considered to have a negligible effect on VMT. Nonetheless, to provide a conservative analysis, the VMT analyses account for the local-serving commercial uses as part of the total daily work VMT.

As described above, Project Design Feature TR-PDF-2 includes numerous TDM strategies. However, the VMT analysis conservatively excludes strategies within Project Design Feature TR-PDF-2 that are not required to comply with local ordinances, programs, or State law. Specifically, the VMT analysis only accounted for the application of allowable parking reduction rates from standard LAMC requirements, promotions and marketing to inform travelers of alternative transportation modes, and inclusion of LAMC-required bicycle parking as TDM measures inherent to the Project design that help reduce the number of single-occupancy vehicle trips. The implementation of the additional TDM strategies as part

of the Project's TDM Program would further reduce single-occupancy vehicle trips to and from the Project Site.

Table IV.M-4 on page IV.M-50 summarizes the results of the analysis using the VMT calculator. As indicated therein, the Project Site is located within the Central APC, which has VMT impact thresholds of an average household VMT per capita of 6.0 and an average work VMT per employee of 7.6. As shown in Table IV.M-4, the total Project would generate an average household VMT per capita of 4.8 and a work VMT per employee of 7.2, which are below the Central APC impact thresholds. **Therefore, the Project would not result in a significant VMT impact, and no mitigation measures are required.** As previously noted, the additional TDM measures would further reduce VMT.

Based on the above, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Thus, the Project's VMT impacts would be less than significant.

(2) Mitigation Measures

No Project-level impacts related to VMT would occur. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

No Project-level impacts related to VMT would occur. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

**Table IV.M-4
Project VMT Analysis Summary**

Project Information^a	South Parcel	North Parcel	Total Project
Area Planning Commission	Central	Central	Central
Travel Behavior Zone (TBZ) ^b	Compact Infill	Compact Infill	Compact Infill
Maximum VMT Reduction ^c	40%	40%	40%
VMT Analysis^d			
Project Land Uses			
Residential	631 du	355 du	986 du
Restaurant	15,800 sf	8,000 sf	23,800 sf
Retail	10,000 sf	5,000 sf	15,000 sf
Office (Live-Work)	1,500 sf	3,750 sf	6,750 sf
Residential Population ^e	1,515	884	2,399
Employee Population ^e	89	57	146
Household VMT			
Total Household VMT	7,056	4,402	11,458
Household VMT per Capita ^f	4.7	5.0	4.8
Impact Threshold	6.0	6.0	6.0
Significant Impact	No	No	No
Work VMT			
Total Work VMT	623	428	1,051
Work VMT per Employee ^g	7.0	7.5	7.2
Impact Threshold	7.6	7.6	7.6
Significant Impact	No	No	No
<p><i>du = dwelling units</i> <i>sf = square feet</i></p> <p>^a The gross total Project analysis is based on outputs from the City of Los Angeles VMT Calculator Version 1.4 (LADOT, June 2023).</p> <p>^b A "Compact Infill" TBZ is characterized in City of Los Angeles VMT Calculator Documentation as higher density neighborhoods that include multi-story buildings and well connected streets.</p> <p>^c The maximum allowable VMT reduction is based on the Project's designated TBZ.</p> <p>^d The VMT forecast incorporates VMT reductions associated with the implementation of TDM measures as part of the Project and includes application of allowable parking reduction rates from standard LAMC requirements, provision of LAMC-required bicycle parking, and promotions and marketing to educate travelers of alternative transportation modes.</p> <p>^e Total residential and employee population estimates are based on residential and employment factors detailed in the City of Los Angeles VMT Calculator Documentation (LADOT and the Department of City Planning, May 2020).</p> <p>^f Household VMT per capita is based on the "home-based production" trip types.</p> <p>^g Work VMT per employee is based on the "home-based work attraction" trip types.</p> <p>Source: Gibson Transportation Consulting, Inc., 2024.</p>			

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

(1) Impact Analysis

As discussed in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would not include hazardous geometric design features. In addition, the proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access such that the proposed driveways would not create hazards to the surrounding streets. **As such, as determined in the Initial Study, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant.** Nonetheless, analysis of this issue is provided in Section 4D of the Transportation Assessment. In addition, an analysis of freeway safety is provided in the Supplemental Transportation Assessment and summarized below.

(a) Freeway Safety Analysis

As discussed above in the Regulatory Framework, TAG Threshold T-3 provides guidance on freeway safety analyses for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.

Based on the Project's trip generation estimate and traffic distribution pattern, which was reviewed and approved by LADOT, the Project would add 25 or more peak hour trips to the I-5 Southbound and Northbound off-ramps to Pasadena Avenue/North Broadway, both of which terminate at signalized intersections located approximately 0.50 miles northeast of the North Parcel.

In accordance with the Freeway Guidance, the 95th percentile ramp queue was calculated using the Highway Capacity Manual (HCM) methodology. Conditions were analyzed for the anticipated Project buildout year of 2034, which includes growth and traffic from related projects, both with and without Project trips. As shown in Table 5 of the Supplemental Transportation Assessment and consistent with the findings of the Transportation Assessment, the queues at the analyzed off-ramps would neither exceed the ramp storage lengths nor extend onto the freeway mainline during any of the analyzed peak hours. Therefore, the Project would not result in any adverse safety conditions along freeway off-ramp facilities, and impacts would be less than significant. In addition, as discussed

above, the Project would implement a TDM Program to reduce single-occupancy vehicle trips to and from the Project Site.

Based on the above, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts including freeway safety impacts would be less than significant.

(2) Mitigation Measures

Project-level impacts related to substantially increasing transportation-related hazards would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to substantially increasing transportation-related hazards were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction Impacts

While it is expected that the majority of Project construction activities would be confined to the Project Site, construction fences may encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. In addition, construction would affect the public right-of-way during installation of new traffic signal heads, mast arms, and left-turn lanes as well as improvement work on curbs and gutters. Furthermore, the parking lane and/or curb lane along North Broadway adjacent to the Project Site may be utilized intermittently during construction. However, travel lanes would be maintained on all streets surrounding the Project Site throughout the construction period and emergency access would not be impeded. In addition, as part of the Construction Traffic Management Plan included as Project Design Feature TR-PDF-1, construction-related deliveries and haul trips would be scheduled to occur outside the commuter peak hours to the extent feasible, thereby reducing the effect on traffic flow on surrounding streets. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained. **Therefore, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.**

(b) Operational Impacts

As described above, access to the Project would be provided by one driveway on the South Parcel from North Broadway, three driveways on the North Parcel from North Broadway, and one driveway on the South Parcel from North Spring Street located beneath the elevated Metro A Line tracks. For the South Parcel, Building 1 and the Mandarin Plaza are bisected by an internal Project vehicular circulation driveway to access the parking garage with ingress and egress located on North Broadway and North Spring Street.

The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. In particular, the Project exceeds the requirement to provide two points of access for properties located within Very High Fire Hazard Severity Zones. 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. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operation of the Project.

In addition, with regard to emergency access associated with wildfires, as discussed in detail in Section IV.P, Wildfire, of this Draft EIR, safe evacuation of the Project and surrounding community would be expected. Also, because the Project Site is a large area of ignition resistant, urbanized landscapes, it is not anticipated that the entire community would need to be relocated off-site during a wildfire event in the nearest wildland areas, as they are located substantial distances to the north and west of the Project Site and are separated by a railroad corridor, roadway, multiple developments and maintained and irrigated landscaped areas. As such, the Project would not impact or substantially impair an adopted emergency response plan or emergency evacuation plan in the event of a wildfire. Refer to Section IV.P, Wildfire for a more detailed discussion of emergency access and evacuation during a wildfire.

Based on the above, Project operation would not result in inadequate emergency access and impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, as previously discussed, the Transportation Assessment assumes the completion of construction in year 2034 under the most conservative analysis, including buildout of all related projects by then, and also analyzes buildout under the long-term scenario to be comprehensive. Furthermore, with the exception of the freeway safety analysis, discussed above, the Project's impact analyses per the CEQA Guidelines Appendix G transportation thresholds and the TAG are not dependent upon the Project buildout date, and, therefore, the results and conclusions presented herein are equally applicable to a long-range completion date. As such, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

(a) Consistency with Transportation Plans and Policies

In accordance with the TAG, the cumulative analysis of consistency with transportation plans and policies must include consideration of any related projects and any transportation system improvements in the vicinity. As shown in Figure III-1 in Section III, Environmental Setting, of the Draft EIR, a total of 25 related projects have been identified. The related projects comprise a variety of uses, including apartments, condominiums, restaurants, hotels, office, industrial, studio and retail uses, as well as mixed-use developments incorporating some or all of these elements. Although the buildout years of many of the related projects are uncertain and may well extend beyond the Project's buildout year, and notwithstanding that some may not ultimately be approved or developed, all related

projects were assumed to be completed by the estimated 2034 Project buildout year for purposes of the traffic analysis.

The majority of the programs, plans, policies, and ordinances reviewed above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21 A.16 and the TDM Ordinance from LAMC Section 12.26 G apply to projects individually. Also, in many cases, the Project (which provides a mix of land uses) would specifically support key policies (such as enhancing pedestrian infrastructure), while many of the nearby related projects would neither support nor interfere with such policies. In addition, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Lastly, as indicated in the Project-level analysis under Threshold (a) above, the Project would not result in significant inconsistencies with applicable transportation plans; as such, the Project would not contribute considerably to any cumulative inconsistencies. **Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to applicable programs, plans, policies, and ordinances related to transportation, and the Project's impacts associated with consistency with such programs, plans, policies, and ordinances would not be cumulatively considerable.**

(b) Vehicle Miles Traveled

As discussed in the LADOT TAG, a development project would have a cumulative VMT impact if it were to result in significant Project-level VMT impacts and were deemed inconsistent with the SCAG 2024–2050 RTP/SCS in terms of development location, density and intensity. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. As indicated in the Project-level analysis under Threshold (b) above, the Project would result in a less-than-significant VMT impact. The Project would also not conflict with the RTP/SCS as indicated in the Project-level analysis under Threshold (a) above (Refer to Section IV.I, Land Use and Planning, of this Draft EIR for a detailed discussion of the Project's potential to conflict with the SCAG RTP/SCS). **Therefore, cumulative impacts associated with VMT would be less than significant, and the Project's VMT impacts would not be cumulatively considerable.**

(c) Hazardous Geometric Design Features

As discussed under Threshold (c) above, the Project would not itself result in a significant impact associated with hazardous geometric design features. According to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts.

Along Spring Street, a mixed-use development (Related Project No. 5, College Station Mixed-Use) is proposed to be located opposite of the Project Site. Although designs have not been finalized, Related Project No. 5 proposes a driveway along Spring Street north of College Street that may be offset from the Spring Street driveway. Spring Street provides five travel lanes including two northbound lanes and three southbound lanes, a center turn lane, and a parking lane on both sides of the street. The approximate distance between the driveway locations as well as the existing geometry of Spring Street provide adequate spacing to avoid vehicle turn conflicts and would not impose additional safety issues.

Along North Broadway, two residential mixed-use developments (Related Project No. 7, 1201 North Broadway and Related Project No. 11, North 942 Broadway) and two hotel developments (Related Project No. 17, Pagoda Hotel and Related Project No. 18, 1101 North Broadway) are proposed to be located within the Project Site vicinity. Although designs have not been finalized, the developments may propose driveways along North Broadway along the same block as the Project Site, including south of North Broadway & Bernard Street and north or south of North Broadway & Bishops Road. The Project does not propose any driveways at Bishops Road and would not conflict with any driveways proposed near this location by either Related Project #7 or Related Project No. 11. The Project proposes a driveway at Cottage Home Street, which is located north of Bernard Street and would not conflict with any driveway proposed by either Related Project No. 11 or Related Project No. 17. North Broadway provides four travel lanes, two lanes in each direction, a center turn lane, and a parking lane on both sides of the street. The approximate distance between the driveway locations as well as the existing geometry of North Broadway provide adequate spacing to avoid vehicle turn conflicts and would not impose additional safety issues.

Similar to the Project, the adjacent related projects would be individually responsible for complying with the City's design standards and requirements to address potential safety conflicts and ensure that no hazardous design features would result. As such, cumulative impacts associated with the Project and related projects would not be expected. In addition, as discussed in the Project-level analysis under Threshold (c) above, project-level impacts to freeway safety would be less than significant, and therefore, the Project would not make a considerable contribution to cumulative freeway safety impacts. **Therefore, cumulative impacts due to hazardous design features would be less than significant and the Project's impacts related to hazardous design features would not be cumulatively considerable.**

(d) Inadequate Emergency Access

As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with the applicable emergency vehicle access

requirements would be confirmed as part of LAFD's fire/life safety plan review and inspection for new construction projects, as set forth in LAMC Section 57.118, which are required prior to the issuance of a building permit. Moreover, the additional traffic generated by the related projects would be dispersed throughout the area and would not be concentrated in a specific location. Furthermore, as previously discussed, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Therefore, cumulative impacts relative to emergency access would be less than significant and the Project's impacts to emergency access would not be cumulatively considerable.**

(2) Mitigation Measures

Cumulative impacts related to the consistency with adopted plans, programs, ordinances, and policies; VMT/CEQA Guidelines Section 15064.3; hazardous geometric design features; and inadequate emergency access would be less than significant and the Project's impacts associated with these issues would not be cumulatively considerable. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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