

## **IV. Environmental Impact Analysis**

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### **I. Transportation**

#### **1. Introduction**

This section analyzes the Project's potential impacts on transportation and is primarily based on the *Transportation Assessment for the 130 W. College Street Project* (Transportation Assessment)<sup>1</sup> prepared for the Project by Gibson Transportation Consulting, Inc., dated October 2024 and included in Appendix I of this Draft EIR.

The Transportation Assessment was prepared pursuant to the Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines* (TAG), dated July 2020 and updated in August 2022, which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) Guidelines from the State of California that require that, for CEQA purposes, transportation impacts be evaluated based on vehicle miles traveled (VMT) rather than level of service (LOS).

The base assumptions and technical methodologies (e.g., trip generation, study locations, analysis methodology, etc.) were identified as part of the Transportation Assessment approach and were outlined in a Memorandum of Understanding (MOU), which was reviewed and approved by LADOT in March 2024. A copy of the MOU is included as Appendix A of the Transportation Assessment. LADOT also reviewed and approved the Transportation Assessment. A copy of LADOT's Assessment Letters for the Transportation Assessment dated March 28, 2025, is included in Appendix I 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:

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<sup>1</sup> Gibson Transportation Consulting, Inc., *Transportation Assessment for the 130 W. College Street, Los Angeles, California, October 2024*.

- 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
- Los Angeles River Design Guidelines

### (1) Federal

#### *(a) Americans with Disabilities Act of 1990*

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The ADA 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, 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, 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 miles 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.<sup>2</sup> This started a process that changed 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

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<sup>2</sup> OPR was renamed the Governor's Office of Land Use and Climate Innovation in July 2024.

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 set 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 established 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 stop<sup>3</sup> or a stop along an existing high-quality transit corridor<sup>4</sup> should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area

<sup>3</sup> As amended by AB 2553, “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 20 minutes or less during the A.M. and P.M. peak commute periods.

<sup>4</sup> “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.

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 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*

On April 4, 2024, the Southern California Association of Government's (SCAG) Regional Council adopted the 2024–2050 RTP/SCS. The 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the needs of the region both today and in the future. The goals for the 2024–2050 RTP/SCS are as follows:

- Mobility: Build and maintain an integrated multimodal transportation network.
- Communities: Develop, connect and sustain livable and thriving communities.
- Environment: Create a healthy region for the people of today and tomorrow.
- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region

The 2024–2050 RTP/SCS also includes growth forecasts through 2050 at the regional, county, and local jurisdictional levels and Traffic Analysis Zones (TAZ). However, projections at the jurisdiction level or smaller geographies, including TAZ, are advisory and non-binding, and are only utilized to conduct required modeling and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. While the 2024–2050 RTP/SCS remains focused on SCAG's core responsibilities and on the requirements of comprehensive regional transportation planning integrated with the development of a SCS, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband, and mobility hubs. The 2024-2025 RTP/SCS also includes a detailed project list and strategic investments to bridge local plans with overarching performance targets and goals. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality,

and improve the region's long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern.

As part of the 2024–2050 RTP/SCS, SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the 2024–2050 RTP/SCS's vision and achievement of SCAG's goals. These policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. These policies address Priority Development Areas (PDAs), increasing housing, 15-minute communities, equitable engagement and decision-making, sustainable development, air quality, clean transportation, natural and agricultural lands preservation, and climate resilience. SCAG has identified development within PDAs, providing sufficient housing opportunities, developing 15-minute communities, and fostering equitable decision-making as the framework for implementing the Regional Planning Policies.

The 2024–2050 RTP/SCS defines PDAs as areas within the SCAG region, where future growth can be located to help the region reach 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool to facilitate plan development and analysis and are used for different purposes, such as growth visioning, performance measurement, or grant applications. As a general principle, development in overlapping PDAs indicates a greater alignment with the goals of the 2024–2050 RTP/SCS. These PDAs are comprised of Neighborhood Mobility Areas (NMAs),<sup>5</sup> Livable Corridors,<sup>6</sup> TPAs,<sup>7</sup> and Spheres of Influence.

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<sup>5</sup> NMAs include four elements that reflect potential to improve, restore, and enhance safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways, and other destinations. The four elements of an NMA are 1) intersection density, 2) low-speed streets, 3) land use diversity, and 4) accessibility to amenities within one-mile using street network distances.

<sup>6</sup> SCAG defines Livable Corridors as 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. Growth at strategic nodes along key corridors, many of which are HQTCs, will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past plans, such as the HQTCs, and input from local jurisdictions during the Local Data Exchange process. Additionally, this strategy integrates certain transit improvements, including Bus Rapid Transit (BRT), other features improving bus performance and user experience, and certain active transportation improvements to support safe bicycling and walking.

<sup>7</sup> In accordance with PRC Section 21099(a)(7), a transit priority area is an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.

SCAG also recognizes that many Livable Corridors are also High Quality Transportation Corridors (HQTCs).<sup>8</sup>

#### (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.<sup>9</sup> The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

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

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

Street classifications are designated in the Mobility Plan, 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:

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<sup>8</sup> A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The City of Los Angeles defines peak hours as between 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M.

<sup>9</sup> Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

- Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
- Avenues pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- Collector Streets: Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.
- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
  - Continuous local streets 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.<sup>10</sup> The Community Plan was adopted in 2000 and amended in 2016. 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.

*(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

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<sup>10</sup> *The City of Los Angeles Department of City Planning 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 this 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.*

to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

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

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

*(d) LADOT Transportation Assessment Guidelines*

As discussed above, 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.<sup>11</sup>

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<sup>11</sup> LADOT, *Transportation Assessment Guidelines*, August 2022.

*(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 6 percent of the City's street miles but accounts for approximately two-thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

*(g) LADOT Interim Guidance for Freeway Safety*

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

*(h) Citywide Design Guidelines*

The Citywide Design Guidelines serve to implement the urban design principles set forth in the City of Los Angeles General Plan Framework Element (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.

*(i) Plan for a Healthy Los Angeles*

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

increase awareness of equity and environmental issues.<sup>12</sup> Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

*(j) Los Angeles River Design Guidelines*

The River Improvement Overlay (RIO) District is a special use district established by Ordinance Nos. 183,144 and 183,145 in August 2014 to support the goals of the Los Angeles River Revitalization Master Plan; contribute to the environmental and ecological health of the City's watersheds; establish a positive interface between river adjacent property and river parks and/or greenways; promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods; provide native habitat and support local species; provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; provide safe, convenient access to and circulation along the river; promote the river identity of river adjacent communities; and support the Low Impact Development (LID) Ordinance and the City's Irrigation Guidelines. The RIO District ordinances establish landscaping, design criteria, and administrative review procedures for projects within the RIO District.<sup>13</sup> The Los Angeles River Design Guidelines complement the Los Angeles River Revitalization Master Plan and builds on the original draft Los Angeles River Design Guidelines from July 2015.<sup>14</sup>

## **b. Existing Conditions**

The study area considered in the Transportation Assessment (Study Area) includes a geographic area that is generally bounded by West College Street to the north, North Main Street to the east, Bruno Street to the south, and North Alameda Street to the west, as well as the existing street system described below.

### **(1) Existing Street Systems**

The existing street system in the Study Area consists of freeways, arterials, and collector and local streets that provide regional, sub-regional, or local access and circulation within the Study Area. These transportation facilities generally provide two to six travel lanes and usually allow parking on either side of the street. Typically, the speed limits range between 25 and 35 miles per hour (mph) on the streets and between 55 and 65 mph on freeways.

<sup>12</sup> City of Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*, 2015.

<sup>13</sup> City of Los Angeles Department of City Planning, *Zoning Information No. 2358, River Improvement Overlay District, Ordinance Nos. 183,144 and 183,145*, revised January 12, 2015.

<sup>14</sup> City of Los Angeles, *LA River Design Guidebook: Boyle Heights, Arts District, Lincoln Heights, Chinatown East*, 2016.

(a) *Freeways*

Primary regional access to the Project Site is provided by U.S. Highway 101 (US-101) and State Route 110 (SR-110). The following is a brief description of the freeways located in the Study Area:

- US-101 generally runs in the east-west direction approximately 0.5 miles south of the Project Site<sup>15</sup>. In the vicinity of the Project Site, US-101 provides four travel lanes in each direction. Access either to or from US-101 North or South is available via interchanges at North Alameda Street, Broadway, and Vignes Street.
- SR-110 generally runs in the north-south direction approximately 0.45 miles west of the Project Site. In the vicinity of the Project Site, SR-110 provides three travel lanes in each direction. Access either to or from SR-110 North or South is available via interchange at Hill Street.

(b) *Roadways*

Listed below are the primary streets and highways that provide regional and local access to the Project Site. The roadway widths provided herein are based on field data provided by Gibson Transportation Consultants:

- North Hill Street is a designated Avenue I and travels in the north-south direction. It is located approximately 1,060 feet west of the Project Site and provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections. Metered parking with A.M. peak hour restrictions on the west side of the street and P.M. peak hour restrictions on the east side of the street is generally available within the Study Area. Based on field observations, travel lanes are typically 10 feet wide and the total paved roadway width is 56 feet with a right-of-way (ROW) of approximately 85 feet within the Study Area. Per the Mobility Plan standards, a roadway width of 70 feet with a ROW of 100 feet is required for North Hill Street, a designated Avenue I.
- North Broadway is a designated Avenue II and travels in the north-south direction. It is located approximately 665 feet west of the Project Site and provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections and a center-turn lane north of West College Street. Metered parking with A.M. peak hour restrictions on the west side of the street and P.M. peak hour restrictions on the east side of the street is available within the Study Area. Based on field observations, travel lanes are typically 9.5 to 10 feet wide and the total paved roadway width is typically 56 feet with a ROW of approximately 75 feet within the

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<sup>15</sup> *US-101 generally travels in the north-south direction within the City, but travels in the east-west direction near the Project Site.*

Study Area. Per the Mobility Plan standards, a roadway width of 56 feet with a ROW of 86 feet is required for North Broadway, a designated Avenue II.

- North Spring Street is a designated Collector Street south of Alpine Street, a designated Avenue III between Alpine Street and West College Street, and a designated Modified Avenue I north of West College Street. It is located approximately 190 feet west of the Project Site and provides two travel lanes, one lane in each direction, south of West College Street. At West College Street, it provides one right-turn lane before continuing north of West College Street, where it provides four to five travel lanes, two to three lanes in each direction, with left-turn lanes at intersections. Metered parking is generally available on both sides of the street south of West College Street within the Study Area. Unmetered parking is also available on both sides of the street north of West College Street, with A.M. peak hour restrictions on the west side of the street within the Study Area. Based on field observations, travel lanes are typically 11 feet wide. South of Alpine Street, North Spring Street has a total paved roadway width of 40 feet with a ROW of 60 feet and is a designated Collector Street, which requires a roadway width of 40 feet with a ROW 66 feet per the Mobility Plan standards. Between Alpine Street and West College Street, North Spring Street has a total paved roadway width between 36 and 40 feet with a ROW of 60 feet and is a designated Avenue III, which requires a roadway width of 46 feet with a ROW of 72 feet per the Mobility Plan standards. North of West College Street, North Spring Street has a total paved roadway width of 84 feet with a ROW of 110 feet and is a designated Modified Avenue I, which requires a roadway width of 76 feet with a ROW of 98 feet per the Mobility Plan standards.
- North Alameda Street is a designated Avenue I that travels in the north-south direction and merges with North Spring Street at West College Street. It is located on the western boundary of the Project Site and provides five travel lanes, two to three lanes in each direction, with left-turn lanes at intersections. Metered parking is available on the west side of the street, with A.M. peak hour restrictions south of Alpine Street within the Study Area. Unmetered parking is generally available on the west side of the street north of Alpine Street and on the east side of the street within the Study Area. Based on field observations, travel lanes are generally 10 feet wide and the total paved roadway width varies between 72 and 86 feet with a ROW of approximately 104 feet within the Study Area. Per the Mobility Plan standards, a roadway width of 70 feet with a ROW of 100 feet is required for North Alameda Street, a designated Avenue I.
- North Main Street is a designated Avenue II that travels northbound south of Alpine Street/North Vignes Street and in the north-south direction north of Alpine Street/North Vignes Street. It is located on the eastern boundary of the Project Site and provides four travel lanes, two lanes in each direction, with left-turn lanes only at Alpine Street/North Vignes Street. Unmetered parking with A.M. peak hour restrictions on the west side of the street and P.M. peak hour restrictions on the east side of the street is generally available within the Study Area. Based on field observations, travel lanes are generally 10 feet wide and the total paved roadway

width is approximately 56 feet with a ROW of approximately 82 feet within the Study Area. Per the Mobility Plan standards, a roadway width of 56 feet with a ROW of 86 feet is required for North Main Street, a designated Avenue II.

- West College Street is a designated Collector Street west of North Hill Street, a designated Avenue III between North Hill Street and North Spring Street/North Alameda Street, a designated Modified Collector Street between North Spring Street/ North Alameda Street and North Main Street, and a designated Local Street east of North Main Street. It travels in the east-west direction. It is located on the northern boundary of the Project Site and provides two to four travel lanes, with one to two lanes in each direction. Metered parking with peak hour restrictions is generally available on one side of the street within the Study Area. Based on field observations, travel lanes are typically 10 feet wide. West of North Hill Street, West College Street has a total paved roadway width of 40 feet with a ROW of 60 feet and is a designated Collector Street, which requires a roadway width of 40 feet with a ROW 66 feet per the Mobility Plan standards. Between North Hill Street and North Spring Street/Alameda Street, West College Street has a total paved roadway width between 36 and 52 feet with a ROW between 60 and 82 feet and is a designated Avenue III, which requires a roadway width of 46 feet with a ROW of 72 feet per the Mobility Plan standards. Between North Spring Street/Alameda Street and North Main Street, West College Street has a total paved roadway width between 36 and 70 feet with a ROW between 60 and 92 feet and is a designated Modified Collector Street, which requires a roadway width of 40 feet with a ROW of 60 feet per the Mobility Plan standards. East of North Main Street, West College Street has a total paved roadway width of 36 feet with a ROW of 60 feet and is a designated Local Street, which requires a roadway width of 36 feet with a ROW of 60 feet per the Mobility Plan standards.
- Alpine Street is a designated Collector Street west of North Hill Street, a designated Avenue III between North Hill Street and North Spring Street, a designated Avenue II between North Spring Street and North Alameda Street, and a designated Avenue I between North Alameda Street and North Main Street. It travels in the east-west direction and merges with North Vignes Street at North Main Street. It is located approximately 380 feet south of the Project Site and provides four travel lanes, two lanes in each direction. Metered parking with peak hour restrictions is generally available on both sides of the street within the Study Area. Based on field observations, travel lanes are typically 10 feet wide. West of North Hill Street, Alpine Street has a total paved roadway width of 40 feet with a ROW of 60 feet and is a designated Collector Street, which requires a roadway width of 40 feet with a ROW 66 feet per the Mobility Plan standards. Between North Hill Street and North Spring Street, Alpine Street has a total paved roadway width of 40 feet with a ROW of 60 feet and is a designated Avenue III, which requires a roadway width of 46 feet with a ROW of 72 feet per the Mobility Plan standards. Between North Spring Street and North Alameda Street, Alpine Street has a total paved roadway width of 56 feet with a ROW of 74 feet and is a designated Avenue II, which requires a roadway width of 56 feet with a ROW of 86 feet per the Mobility Plan standards. Between North Alameda Street and North

Main Street, Alpine Street has a total paved roadway width of 80 feet with a ROW of 98 feet and is a designated Avenue I, which requires a roadway width of 70 feet with a ROW of 100 feet per the Mobility Plan standards.

- Bruno Street is a designated Collector Street that travels in the east-west direction. It is located on the southern boundary of the Project site and provides two travel lanes, one lane in each direction. Unmetered parking is generally available on both sides of the street within the Study Area. Based on field observations, travel lanes are typically 13 feet wide and the total paved roadway width is approximately 32 feet with a ROW of 57 feet within the Study Area. Per the Mobility Plan standards, a roadway width of 40 feet with a ROW of 66 feet is required for Bruno Street, a designated Collector.

## (2) Existing Pedestrian and Bicycle Facilities

### *(a) Pedestrian Facilities*

The signalized intersections surrounding the Project Site provide access in the vicinity of the Project Site. The signalized intersections provide pedestrian phasing, crosswalk striping, and ADA accessible ramps at most crosswalks. Currently along the Project frontages, 10-foot wide sidewalks are provided along North Alameda Street, and 12-foot wide sidewalks are provided along North Main Street. Additionally, 9-foot wide and 10-foot wide sidewalks are provided along some sections of West College Street and Bruno Street, respectively. Sidewalks along the remaining sections of West College Street and Bruno Street are unpaved or substandard, thus providing incomplete pedestrian connections. Additional pedestrian facilities, including standard and continental crosswalks at intersections and midblock crosswalks, are also located within the Study Area.

### *(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. These lanes are identified as the Bicycle Lane Network (BLN). Class III bicycle routes and bicycle-friendly streets are those whose motorists and cyclists share the roadway and there is no separate striping for bicycle travel. Bicycle routes and bicycle-friendly streets are preferably located 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, makes motorists aware of bicycles potentially in the travel lane, and shows bicyclists the correct direction of travel.

As detailed in the Transportation Assessment, there are no bicycle facilities adjacent to the Project Site. However, there are bicycle facilities within the Study Area, the closest of

which to the Project Site is a Metro bike share station located approximately 170 feet west at one of the Metro A Line Chinatown Station entrances.

### (3) Existing Transit System

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

- Metro Local 28 is a local line that travels between Century City and 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 nine minutes during both the A.M. and P.M. peak period.
- Metro Local 33 is a local line that travels between Downtown Los Angeles and Santa Monica via Venice Boulevard. This line operates 24 hours a day and has average headways of 15 to 16 minutes during the A.M. peak periods and 14 to 17 minutes during the P.M. peak periods.
- Metro Local 45 is a local line that travels between Lincoln Heights and Downtown Los Angeles and Harbor Freeway Station via North Broadway. This line operates 24 hours a day and has average headways of eight to 11 minutes during the A.M. peak period and nine to 10 minutes during the P.M. peak periods.
- Metro Local 70 is a local line that travels between Downtown Los Angeles and El Monte via Cesar Chavez Avenue/Atlantic Boulevard/Garvey Avenue. This line operates 24 hours a day and has average headways of eight minutes during the A.M. peak period and eight to nine minutes during the P.M. peak periods.
- Metro Local 76 is a local line that travels between Downtown Los Angeles and El Monte via Valley Boulevard. This line operates 24 hours a day and has average headways of 15 to 16 minutes during the A.M. peak period and 16 to 17 minutes during the P.M. peak period.
- Metro Local 78 is a local line that travels between Downtown Los Angeles and 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 11 minutes during the A.M. peak period and 10 to 12 minutes during the P.M. peak period.
- Metro Local 81 is a local line that travels between Eagle Rock and Downtown Los Angeles and Harbor Freeway (SR-110) Station via Figueroa Street. This line operates 24 hours a day and has average headways of 14 to 16 minutes during the A.M. peak period and 13 to 16 minutes during the P.M. peak period.
- Metro Local 90 is a local line that travels between the Los Angeles Civic Center and Sunland and North Hollywood via Glendale Avenue/Foothill Boulevard/

Vineland Avenue. This line operates between the hours of 4:00 A.M. and 1:00 A.M. and has average headways of 20 to 23 minutes during the A.M. peak period and 18 to 20 minutes during the P.M. peak period.

- Metro Local 94 is a local line that travels between Downtown Los Angeles and Glendale, Burbank, and North Hollywood via San Fernando Road/Magnolia Boulevard. This line operates between the hours of 4:30 A.M. and 2:45 A.M. and has average headways of 15 minutes during the A.M. peak period and 15 to 16 minutes during the P.M. peak period.
- Metro A Line is a rail line that travels between East Los Angeles and Downtown Los Angeles and Pasadena. This line operates between the hours of 3:30 A.M. and 1:30 A.M. and has an average headway of eight to nine minutes during the A.M. peak period and eight minutes during the P.M. peak period.
- LADOT Commuter Express 409 is a local line that travels between East Glendale and Downtown Los Angeles. This line operates between the hours of 5:30 A.M. and 9:00 A.M. and between 4:00 P.M. and 7:30 P.M. and has average headways of 23 minutes during the A.M. peak period and 26 minutes during the P.M. peak period.
- LADOT Commuter Express 419 is a local line that travels between Chatsworth and Downtown Los Angeles. This line operates between the hours of 5:30 A.M. and 9:30 A.M. and between 3:30 P.M. and 8:30 P.M. and has average headways of 23 minutes during the A.M. peak period and 34 minutes during the P.M. peak period.
- LADOT DASH B is a local line that travels between Downtown Los Angeles, 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 between Lincoln Heights to and Chinatown. This line operates between the hours of 6:00 A.M. and 8:00 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 between Downtown Los Angeles and Santa Clarita. This line operates between the hours of 7:00 A.M. and 8:00 A.M. and between 4:30 P.M. and 6:30 P.M. with only one stop during the A.M. peak period and two stops during the P.M. peak period.
- Santa Clarita Transit 799 is an express line that travels from between Santa Clarita and Downtown Los Angeles. This line operates between the hours of 5:00 A.M. and 8:30 A.M. and between 3:30 P.M. and 8:00 P.M. and has an average headway of 36 minutes during the A.M. peak period and 48 minutes during the P.M. peak period.

- AVTA 785 is an express line that travels from between Lancaster, Palmdale, and Downtown Los Angeles. This line operates between the hours of 4:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 8:00 P.M. with an average headway of 30 minutes during the A.M. peak period and 26 minutes during the P.M. peak period.
- Torrance Transit 4X is an express line that travels between Torrance to and Downtown Los Angeles. This line operates between the hours of 5:30 A.M. and 10:00 P.M. with average headways of 60 to 90 minutes during the A.M. peak period and 80 minutes during the P.M. peak period.

#### (4) Existing High Injury Network Facilities

Vision Zero is a traffic safety program that promotes strategies to eliminate transportation-related collisions that result in severe injury or death. Vision Zero has identified the HIN, a network of streets that has a higher incidence of severe and fatal collisions. The Project Site is not adjacent to any roadways that are part of the HIN. Near the Project Site, West College Street between Spring Street (south leg) and Yale Street is identified in the HIN.

#### (5) Existing Project Site Conditions

The Project Site is located within the Central City North Community Plan area of the City and is bounded by West College Street to the north, North Main Street to the east, Bruno Street to the south, and North Alameda Street to the west. The Project Site is located within a fully developed area and is located in a City-designated TPA and within a SCAG-designated HQTC.<sup>16,17</sup>

The Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site but there is a billboard, lighting, a shipping container, six electric bus chargers, and fencing. Local access to the Project Site is provided by West College Street and Bruno Street.

### c. Future Base Transportation System Improvements

The transportation network within the Study Area could be affected by regional improvement plans, local specific plans, and programmed improvements implemented prior to buildout of the Project. Therefore, the analysis in the Transportation Assessment accounts

<sup>16</sup> City of Los Angeles, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street*, November 7, 2024.

<sup>17</sup> SCAG, *High Quality Transit Corridors Interactive*, <https://maps.scag.ca.gov/portal/apps/experiencebuilder/experience/?id=97f9699f14654b3b8895c74846541f75&page=home>, accessed November 7, 2024.

for roadway improvements that have been funded and are expected to be implemented prior to buildout of the Project, as well as known related projects. Other proposed roadway improvement projects that are not funded and traffic/trip reduction strategies, such as TDM programs for individual buildings and developments, were omitted from the analysis. The following proposed improvements were evaluated for their potential effects on the future roadway configurations:

- The Los Angeles State Historic Park Pedestrian Bridge—The Los Angeles State Historic Park provides 32 acres of public open space and is located north 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 Broadway. The pedestrian bridge connection is anticipated to increase pedestrian activity along the adjacent Broadway corridor. There is currently no dedicated funding or design of the future pedestrian bridge connection; nonetheless, no changes to intersection lane configurations are anticipated in the Study Area as a result of this proposed pedestrian bridge. As shown in Table III-1 in Section III, Environmental Setting, of this Draft EIR, this project is included as Related Project No. 20.
- Los Angeles Aerial Rapid Transit—The Los Angeles Aerial Rapid Transit (LA ART) is a proposed aerial rapid transit gondola system that would provide daily 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. LA ART is anticipated to increase pedestrian activity within the Study Area. No changes to intersection lane configurations are anticipated in the Study Area as a result of the LA ART. As shown in Table III-1 in Section III, Environmental Setting, of this Draft EIR, this project is included as Related Project No. 21.

Additionally, in the Mobility Plan, the City identified 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 vehicular lane configurations were made or incorporated into the analysis as a result of the Mobility Plan. However, the following mobility-enhanced networks included corridors within the Study Area:

- TEN—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. Broadway, Cesar E. Chavez Avenue, and North Main Street have been designated as part of the TEN.

- **NEN**—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. Ord Street between New High Street and North Alameda Street, Alpine Street between Broadway and North Main Street, West College Street between Broadway and North Main Street, Llewellyn Street, West Ann Street between Spring Street and North Main Street, New High Street between Ord Street and Cesar E. Chavez Avenue, and Spring Street between Ord Street and Cesar E. Chavez Avenue have been designated as part of the NEN.
- **BEN/BLN**— Broadway north of Cesar E. Chavez Avenue, Spring Street south of Cesar E. Chavez Avenue, North Main Street, Cesar E. Chavez Avenue west of Broadway, and Alpine Street/Vignes Street east of Broadway have been designated as part of the BEN. Spring Street north of Ord Street and Cesar E. Chavez Avenue east of Broadway have been designated as part of the BLN.
- **PED**—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. Hill Street, Broadway, Spring Street, New High Street, North Main Street, Cesar E. Chavez Avenue, Alpine Street/Vignes Street east of Hill Street, and West College Street west of North Main Street are designated as part of the PED.

In addition to the mobility-enhanced networks above, the Mobility Plan also identifies Vehicle Enhanced Networks (VEN). As discussed in the Regulatory Framework subsection above, the VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times. There are no VEN corridors located within the Study Area.

### 3. Project Impacts

#### a. Thresholds of Significance

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

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

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

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

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

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

## **b. Methodology**

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

CEQA Guidelines Transportation Threshold (a) requires an analysis of the Project's potential to conflict with programs, plans, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Accordingly, the impact analysis below evaluates the Project's potential to conflict with the applicable transportation programs, plans, ordinances, and policies listed in Subsection 2.a., Regulatory Framework above.

In accordance with the City's TAG, a project that generally conforms with, and does not obstruct, the City's development policies and standards would generally be considered consistent and not in conflict with such plans and standards. As discussed in the Transportation Assessment, a project would not be shown to result in an impact merely based on whether a project would not implement an adopted plan, program, ordinance, or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with or preclude the City from implementing adopted plans, programs, ordinances, or policies. Furthermore, under CEQA, a project is not considered to be inconsistent with or conflict with an applicable plan if it would not conflict with the overall intent of the plan or preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

### **(2) Vehicle Miles Traveled**

#### **(a) VMT Impact Thresholds**

The City's VMT impact criteria for development projects are specified in Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG. Per the criteria, a development

project would have a potential significant impact if the project meets one or more of the following:

- For residential projects, a development project may have a potential significant impact if it generates household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.
- For commercial projects, a development project may have a potential significant impact if it generates work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving projects, including retail projects, entertainment projects, and/or event centers, a 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.

Table 2.2-1 of the TAG provides the daily household VMT per capita and daily work VMT per employee impact thresholds for the APC areas. The Project does not include residential uses, and, as such, the daily household VMT per capita impact threshold would not apply to the Project. The Project's analysis of VMT focuses on the work VMT. The Project Site is located in the Central APC area and the corresponding daily work VMT per employee threshold is 7.6 daily VMT per employee.

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

#### *(b) VMT Analysis Methodology*

LADOT prepared a tool (VMT Calculator) designed to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The VMT Calculator (Version 1.4, released June 2023) accounts for a variety of sociodemographic, land use, and built environment factors estimated for each census tract within the City, as well as the interaction of land uses within a mixed-use development. Some of the key factors built into the VMT Calculator include travel behavior zones, mixed-use development methodology, population and employment assumptions, and TDM measures.

*(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 City of Los Angeles VMT Calculator Documentation (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.<sup>18</sup> 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 an Urban (Zone 4) TBZ.

*(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
- Land use density of the project
- Transportation network connectivity
- Availability of and proximity to transit
- Proximity to retail and other destinations

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<sup>18</sup> Los Angeles Department of Transportation and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. Note that while the VMT Calculator itself is now on Version 1.4, the VMT Calculator Documentation is still Version 1.3 as of the date of publication of this Draft EIR.

- Vehicle ownership rates
- Household size

*(iii) Trip Lengths*

The VMT Calculator estimates trip lengths based on information from the City's Travel Demand Forecasting Model that considers the traffic analysis zone within 0.125 miles of a project to determine the trip length and trip type, both of which factor into the calculation of the 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.<sup>19</sup> A summary of the population and employment assumptions for various land uses is provided in Table 1 of the 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 strategies as project design features or mitigation measures. The following seven categories of TDM strategies are included in the VMT Calculator:

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

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<sup>19</sup> *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.*

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented by the California Air Pollution Control Officers Association in their report titled *Quantifying Greenhouse Gas Mitigation Measures*.<sup>20</sup>

### (3) Hazardous Geometric Design Features

#### (a) *Geometric Design Features and Incompatible Use 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, such as curves or grade changes, and a project's proximity to streets identified in the HIN or the Safe Routes to School program.

#### (b) *Freeway Safety Analysis*

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

Based on the Freeway Guidance, a transportation assessment for a development project must include analysis of any freeway off-ramp where the project adds 25 or more peak-hour trips. A project would result in a significant impact at such a ramp if all of the following three criteria were met:

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. A 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 mph.

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<sup>20</sup> 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.

#### (4) Emergency Access

The analysis of the Project's potential access impacts includes a review of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination was made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede emergency access on adjacent City streets and/or result in potential safety impacts.

### c. Project Design Features

The Project would implement the following project design feature associated with transportation:

**Project Design Feature TR-PDF-1:** A detailed Construction Traffic Management Plan (CTMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval, prior to commencing construction. The CTMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP 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 durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Implementation of temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people) during all construction activities adjacent to North Alameda Street, West College Street, North Main Street, and Bruno Street to ensure traffic safety on the public right-of-way (ROW).
- Scheduling of construction-related activities to reduce the effect on traffic flow on surrounding arterial streets.
- Containment of construction activity within the Project Site boundaries to the extent feasible.
- Coordination with LADOT to address any transit stop modifications or relocations.

- Coordination with Metro to address any potential temporary effects along Metro ROW due to construction equipment (e.g., cranes, scaffolding, lifts).
- Implementation of safety precautions for pedestrian and bicyclists through such measures as alternate routing and protection barriers.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours as a condition of an approved haul route.
- Prohibition of construction-related vehicles/equipment staging on adjacent streets, unless specifically approved as a condition of an approved haul route.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- 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 posted at the site readily visible to any interested party during site preparation, grading, and construction.
- Obtainment of the required permits for truck haul routes from the City prior to the issuance of any grading permit for the Project.

## d. Analysis of Project Impacts

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

### (1) Impact Analysis

Table 2.1-1 of the TAG provides the City plans, policies, programs, ordinances, and standards that are relevant in determining project consistency (i.e., whether there is a conflict), including the following that apply to the Project: the Mobility Plan, Plan for a Healthy Los Angeles, Central City North Community Plan, LAMC, LADOT Vision Zero, Streetscape Plans, and Citywide Design Guidelines. The Project's potential to conflict with these programs, plans, ordinances, and policies, and with SCAG's 2024–2050 RTP/SCS, is analyzed below.

*(a) Mobility Plan 2035*

A detailed analysis of the Project's potential to conflict with the applicable policies in the Mobility Plan is provided in Table IV.I-1 on page IV.I-31.

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. As provided in the Transportation Assessment, though no specific improvements have been identified adjacent to the Project Site or within the Study Area, and there is no schedule for implementation of any improvements related to these mobility-enhanced networks, they represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. Nevertheless, as discussed further below and in Table IV.I-1, the Project would support the City's overarching objective of the mobility-enhanced networks to improve urban mobility.

The Mobility Plan also designates street and sidewalk width standards based on a street's functional classification. As provided in the Transportation Assessment, a one-foot dedication on North Alameda Street and West College Street and a three-foot dedication on North Main Street along the Project Site frontages would be provided to meet the half-right-of-way requirements and widen the sidewalks. While the Mobility Plan would have typically required an eight-foot dedication and improvement along Bruno Street to meet the half-right-of-way requirements, a Department of City Planning interdepartmental memorandum to the City's Department of Public Works, dated August 14, 2007, states that: "Under no circumstances, is the granite paving [Historic Cultural Monument #211] to be removed or covered in asphalt." Refer to Section IV.B, Cultural Resources, of this Draft EIR for further discussion of this historic resource. As such, five-foot sidewalks are provided along Bruno Street so as not to disturb the historic pavers. An additional five feet would be provided to extend the proposed sidewalk to 10 feet along both ends of the block where the historic pavers are not present. The additional sidewalk width would enhance the pedestrian experience in the vicinity of the Project Site.

As discussed in Section II, Project Description, of this Draft EIR, vehicular access to the Project parking would be provided from West College Street, which is a designated Modified Collector. Vehicular access to the Project would be placed on a non-arterial street in order to be consistent with the driveway location planning guidelines. A separate driveway would be provided to the loading area west of the primary vehicular driveway. The driveways would be designed consistent with LADOT standards and ADA requirements. Pedestrian and bicycle access, as well as a passenger loading area along Bruno Street, would connect to the internal pedestrian walkways to reduce potential conflicts with vehicle traffic. Further, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure. Vehicular access to the Project is not proposed along a street with an existing

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

| Applicable Policies                                                                                                                                                                                                       | Would the Project Conflict?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Goal 1: Safety First</b>                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><b><u>Policy 1.1 Roadway User Vulnerability</u></b></p> <p>Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.</p>                                                         | <p><b>No Conflict.</b> While this policy applies to the City and not individual development projects, the Project would include pedestrian enhancements along the Project Site frontages to prioritize the safety of all roadway users. Such enhancements include wider sidewalks on North Alameda Street, West College Street, and North Main Street along the Project Site frontages, a passenger loading area and pavement treatment to provide a seamless connection between the internal pedestrian walkways and the public sidewalks on Bruno Street, and publicly accessible outdoor amenities. Separate pedestrian and bicycle access to the Project Site would be provided via office lobbies and commercial entrances along North Alameda Street, North Main Street, and Bruno Street. All improvements within the public right-of-way would be designed and completed in consultation with LADOT, or other agencies (e.g., Metro), and in compliance of standard guidelines, including the requirements of the ADA. Therefore, the Project would not conflict with Mobility Plan Policy 1.1.</p> |
| <p><b><u>Policy 1.2 Complete Streets</u></b></p> <p>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><b>No Conflict.</b> While this policy applies to the City and not individual development projects, the Project would support the mobility goals of the City and help facilitate pedestrian and bicycle accessibility and improve the safety and mobility of all users. 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. In addition, as discussed above in Policy 1.1, the Project would include pedestrian enhancements along the Project Site frontages to prioritize the safety of all roadway users. Therefore, the Project would not conflict with Mobility Plan Policy 1.2.</p>                                                                                                                                                                                                                                                                                                                             |
| <p><b><u>Policy 1.3 Safe Routes to Schools</u></b></p> <p>Prioritize the safety of school children on all streets regardless of highway classifications.</p>                                                              | <p><b>No Conflict.</b> There are no schools adjacent to the Project Site. Castelar Elementary School and Ann Elementary School are located approximately 1,100 feet west and 1,200 feet north of the Project Site, respectively. All infrastructure and safety improvements identified as part of the City's Safe Routes to School program that are located within the vicinity of the Project Site have been implemented, and the Project would not preclude any future improvements of nearby crossings. Therefore, the Project would not conflict with Mobility Plan Policy 1.3.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b><u>Policy 1.6 Multi-Modal Detour Facilities</u></b></p> <p>Design detour facilities to provide safe passage for all modes of travel during times of construction.</p>                                               | <p><b>No Conflict.</b> As noted above, pursuant to Project Design Feature TR-PDF-1, the Project would prepare a CTMP that would include detour routes for all applicable travel modes, including pedestrian and transit users, and any impediments to the public right-of-way to ensure safe passage for all modes</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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

| Applicable Policies                                                                                                                                                                                                                                                          | Would the Project Conflict?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                              | of travel during Project construction. Therefore, the Project would not conflict with Mobility Plan Policy 1.6.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Goal 2: World Class Infrastructure</b>                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p><b><u>Policy 2.3 Pedestrian Infrastructure</u></b></p> <p>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.</p> | <p><b>No Conflict.</b> West College Street and North Main Street along the Project Site frontages are designated as part of the Pedestrian Enhanced District. The Project would enhance pedestrian access within and around the Project Site by providing connections to pedestrian walkways, publicly accessible outdoor amenities, and landscaping elements. The Project would provide a one-foot dedication on West College Street and a three-foot dedication on North Main Street to meet the Mobility Plan street standards and widen the pedestrian sidewalk. The Project would also provide the required dedications along North Alameda Street. Separate pedestrian entrances from vehicular driveways to the Project Site would also be provided to create a safe and comfortable walking environment by minimizing vehicular-pedestrian conflicts. All driveways would be designed to provide an adequate pedestrian refuge area between the driveways, where necessary. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.</p> |
| <p><b><u>Policy 2.4 Neighborhood Enhanced Network</u></b></p> <p>Provide a slow speed network of locally serving streets.</p>                                                                                                                                                | <p><b>No Conflict.</b> West College Street along the Project Site has been identified as part of the NEN. West College Street would provide direct access to the Project Site. While this policy applies to the City and not individual development projects, the Project frontages would be lined with street trees as visual cues to the neighborhood character of the streets. In addition, the Project would not impede the development of any future improvements on this roadway. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><b><u>Policy 2.5 Transit Network</u></b></p> <p>Improve the performance and reliability of existing and future bus service.</p>                                                                                                                                           | <p><b>No Conflict.</b> North Main Street along the Project Site has been identified as part of the TEN. While this policy applies to the City and not individual development projects, the Project would not provide any vehicular access along this roadway and, as such, would not preclude future improvements to existing and/or future transit services or operations. The Project would encourage transit usage by developing an office project and ground floor commercial uses with convenient access to nearby rail and bus transit services. Therefore, the Project would not conflict with Mobility Plan Policy 2.5.</p>                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b><u>Policy 2.6 Bicycle Networks</u></b></p> <p>Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.</p>                                                                                             | <p><b>No Conflict.</b> There are no existing bicycle facilities adjacent to the Project Site, and, as such, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure. North Main Street along the Project Site has been identified as part of the BEN. The Project driveway is proposed on West College Street and would not be located along a street with an existing or proposed bicycle facility. Furthermore, bicycle access would be separate from the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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

| Applicable Policies                                                                                                                                                                                                                                                                                                                                                 | Would the Project Conflict?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                     | proposed vehicular access points, which would ensure safe and convenient access to the Project Site for bicyclists. The Project would not preclude future implementation of the bicycle infrastructure. Therefore, the Project would not conflict with Mobility Policy Plan 2.6.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b><u>Policy 2.9 Multiple Networks</u></b></p> <p>Consider the role of each mode enhanced network when designing a street that included multiple modes.</p>                                                                                                                                                                                                      | <p><b>No Conflict.</b> As discussed above in Policies 2.3 to 2.6, the Project vicinity includes a mix of enhanced networks identified as part of the Mobility Plan. While this policy applies to the City and not individual development projects, the Project would not preclude the City from implementing the policy. The Project would provide and accommodate various modes of travel on the surrounding streets and minimize conflicts to prioritize safety as described above. Furthermore, the Project Site is served by a variety of public transit options, including a number of local and regional bus lines serviced by Metro and LADOT that provide access to light rail stations near the Project Site. In particular, the Project Site is located directly across North Alameda Street from the Metro A Line Chinatown Station, with access on the northwestern and southwestern corners of the intersection of West College Street and North Alameda Street/Spring Street. The Project Site is also located adjacent to stops for Metro Lines 70 and 76; LADOT DASH Lincoln Heights/Chinatown route and DASH Downtown Routes A, B, D, and E; and Santa Clarita Transit Lines 794 and 799. Moreover, the Project Site is located less than 0.5 miles north of Union Station along North Alameda Street, which is a hub for all major public transit lines for the region. 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. Therefore, the Project would not conflict with Mobility Plan Policy 2.9.</p> |
| <p><b><u>Policy 2.10 Loading Areas</u></b></p> <p>Facilitate the provision of adequate on and off-street loading areas.</p>                                                                                                                                                                                                                                         | <p><b>No Conflict.</b> The Project would provide a loading area on-site with a separate driveway located on West College Street. The loading area would be designed to meet the Project Site loading needs without disrupting operations within the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><b><u>Policy 2.17 Street Widenings</u></b></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><b>No Conflict.</b> The Project would provide a one-foot dedication on both North Alameda Street and West College Street and a three-foot dedication on North Main Street to meet the Mobility Plan half right-of-way requirements, which would widen the pedestrian sidewalks. While the Mobility Plan would have typically required an eight-foot dedication and improvement along Bruno Street to meet the half-right-of-way requirements, a Department of City Planning interdepartmental memorandum to the City's Department of Public Works, dated August 14, 2007, states that: "Under no circumstances, is the granite paving [Historic Cultural Monument #211] to be</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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

| Applicable Policies                                                                                                                                                                                                                      | Would the Project Conflict?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                          | removed or covered in asphalt.” Nonetheless, the Project includes a pavement treatment along the portions of the Bruno Street frontage that do not include historic pavers to provide a seamless connection between the pedestrian walkways and public sidewalks. Therefore, the Project would not conflict with Mobility Plan Policy 2.17.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Goal 3: Access for All Angelenos</b>                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b><u>Policy 3.1 Access for All</u></b></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><b>No Conflict.</b> While this policy applies to the City and not individual development projects, the Project would encourage multi-modal transportation alternatives and access for all travel modes to and from the Project Site as it is located diagonally opposite the Metro A Line Chinatown Station. The Project would provide separate pedestrian entrances and on-site bicycle parking and amenities to encourage walking and bicycling. The Project would encourage transit usage by developing an office project with local-serving commercial uses located in proximity to transit. The Project would support those employees and visitors who choose to travel by automobile through the provision of one primary driveway along West College Street to the parking garage. Therefore, the Project would not conflict with Mobility Plan Policy 3.1.</p> |
| <p><b><u>Policy 3.2 People with Disabilities</u></b></p> <p>Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>                                                | <p><b>No Conflict.</b> While this policy applies to the City and not individual development projects, the proposed improvements of the Project required as part of the subdivision map process would be designed consistent with all ADA requirements. The Project would include new ADA facilities on the eastern portion of the Project Site along North Main Street, which currently does not have ADA facilities (i.e., curb ramps). Therefore, the Project would not conflict with Mobility Plan Policy 3.2.</p>                                                                                                                                                                                                                                                                                                                                                     |
| <p><b><u>Policy 3.3 Land Use Access and Mix</u></b></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><b>No Conflict.</b> The Project would develop office and commercial uses in proximity to residential uses, other employment opportunities and commercial uses, cultural destinations, and local-serving retail and restaurants in an urban area. The Project and its surrounding mix of land uses would encourage ridesharing and use of alternative transportation modes to minimize vehicle trips. The Project supports initiatives to create TODs as it would develop on an infill site located adjacent to and near multiple transit services. Additionally, the Project includes design elements considered as TDM strategies that would further reduce the number of single-occupancy vehicle trips to the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 3.3.</p>                                                            |
| <p><b><u>Policy 3.4 Transit Services</u></b></p> <p>Provide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services.</p>                                                            | <p><b>No Conflict.</b> While this policy applies to the City and not individual development projects, the Project would be located near the Metro A Line Chinatown Station and served by multiple local and rapid bus lines as noted above. Access to nearby transit stops would be provided with safe and</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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

| Applicable Policies                                                                                                                                                                                                                                                                                                | Would the Project Conflict?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                    | convenient paths of travel to and from the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 3.4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b><u>Policy 3.5 Multi-Modal Features</u></b><br>Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders. | <b>No Conflict.</b> The Project would support “first-mile, last-mile solutions” by developing a commercial office project located in an active urban area near major transit stops and local and rapid bus stops. Additionally, the Project would include several TDM strategies that would encourage the use of transit and other alternative modes of transportation. Therefore, the Project would not conflict with Mobility Plan Policy 3.5.                                                                                                                                                              |
| <b><u>Policy 3.6 Regional Transportation &amp; Union Station</u></b><br>Continue to promote Union Station as the major regional transportation hub linking Amtrak, Metrolink, Metro Rail, and highspeed rail service.                                                                                              | <b>No Conflict.</b> The Project is located approximately 0.5 miles north of Union Station and diagonally opposite the Metro A Line Chinatown Station, which provides a direct connection to Union Station. Therefore, the Project would not conflict with Mobility Plan Policy 3.6.                                                                                                                                                                                                                                                                                                                           |
| <b><u>Policy 3.7 Regional Transit Connections</u></b><br>Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.                                                                                                                                               | <b>No Conflict.</b> While this policy applies to the City and not individual development projects, the Project would improve access between transit and major regional destinations by developing a mix of office with commercial uses and promoting jobs/housing balance in an urban area near transit. Therefore, the Project would not conflict with Mobility Plan Policy 3.7.                                                                                                                                                                                                                             |
| <b><u>Policy 3.8 Bicycle Parking</u></b><br>Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.                                                                                                                                                                            | <b>No Conflict.</b> The Project would provide 123 long-term and 26 short-term bicycle parking and bicycle amenities, such as showers, lockers/storage, and repair stands, to encourage bicycling for employees and visitors to the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 3.8.                                                                                                                                                                                                                                                                                     |
| <b><i>Goal 4: Collaboration, Communication, and Informed Choices</i></b>                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b><u>Policy 4.8 Transportation Demand Management Strategies</u></b><br>Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.                                                                                                      | <b>No Conflict.</b> The Project would encourage the use of alternative modes of travel through its proximity to multiple transit services. Additionally, the Project would include TDM strategies, such as promotions and marketing to educate and inform employees and visitors of available mobility options, parking incentives and allowable reductions, ride-share program, on-site bicycle parking and amenities, etc., as part of its TDM program to reduce the number of single-occupancy vehicle trips to the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 4.8. |
| <b><u>Policy 4.13 Parking and Land Use Management</u></b>                                                                                                                                                                                                                                                          | <b>No Conflict.</b> The Project would provide sufficient off-street parking to accommodate the needs of employees and visitors at the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.                                                                                                                                                                                                                                                                                                                                                                                 |

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

| <b>Applicable Policies</b>                                                                                                                                                                                                                                                                              | <b>Would the Project Conflict?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Balance on-street and off-street parking supply with other transportation and land use objectives.                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b><u>Policy 4.14 Wayfinding</u></b><br>Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms.                                                                       | <b>No Conflict.</b> The Project would include marketing activities, including printed/posted materials and digitally distributed information, to ensure that employees and visitors at the Project Site are aware of all mobility options available on-site and in the surrounding area. Therefore, the Project would not conflict with Mobility Plan Policy 4.14.                                                                                                                                                                                                                                                                                                                                                             |
| <b><i>Goal 5: Clean Environments and Health Communities</i></b>                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b><u>Policy 5.1 Sustainable Transportation</u></b><br>Encourage the development of a sustainable transportation system that promotes environmental and public health.                                                                                                                                  | <b>No Conflict.</b> While this policy applies to the City and not individual development projects, the Project would support this policy because it would encourage sustainable transportation by providing on-site bicycle parking facilities and amenities and separate pedestrian entrances, both of which would encourage the use of active transportation modes, such as biking and walking, to promote environmental and public health. Additionally, the Project Site is well served by public transit, including Metro rail and bus lines, which would provide employees and visitors to the Project with public transportation alternatives. Therefore, the Project would not conflict with Mobility Plan Policy 5.1. |
| <b><u>Policy 5.2 Vehicle Miles Traveled (VMT)</u></b><br>Support ways to reduce vehicle miles traveled (VMT) per capita.                                                                                                                                                                                | <b>No Conflict.</b> The Project is estimated to generate lower work VMT per employee than the average for the area with implementation of Mitigation Measure TR-MM-1, as discussed under Threshold (b) below. Therefore, the Project would not conflict with Mobility Plan Policy 5.2.                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b><u>Policy 5.4 Clean Fuels and Vehicles</u></b><br>Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.                                                                                                                                 | <b>No Conflict.</b> While this policy applies to the City and not individual development projects, the Project would provide EV parking and charging stations in accordance with applicable LAMC requirements to promote usage of EVs, which produce less GHG emissions compared to non-EVs. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.                                                                                                                                                                                                                                                                                                                                                          |
| <p><sup>a</sup> 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).<br/>           Source: Gibson Transportation, 2024 and the Department of City Planning, 2025.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

bicycle facility and would not preclude or prohibit any future roadway improvements proposed in the Mobility Plan.

The Project supports initiatives to create TODs by proposing an office development with local-serving retail/restaurant uses 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. As part of the Project, all four Project Site street frontages would be improved to provide wider sidewalks. The Project would also provide a pedestrian drop-off area and pavement treatment along Bruno Street to provide a seamless connection between the internal pedestrian walkways and public sidewalks. Additionally, the Project would plant street trees, provide publicly accessible outdoor amenities, and landscaping elements to create a walkable and attractive pedestrian environment. As further detailed below, the Project would also implement TDM strategies to reduce the dependency on single-occupancy vehicles and encourage the use of transit and other alternative modes of transportation. Overall, the Project would not conflict with the applicable policies of the Mobility Plan.

*(b) Plan for a Healthy Los Angeles*

A detailed analysis of the Project's potential to conflict with the applicable policies in the Plan for a Healthy Los Angeles is provided in Table IV.I-2 on page IV.I-38. In summary, the Project prioritizes safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian facilities at adjacent intersections. Furthermore, the Project would support healthy lifestyles by locating jobs near public transit; providing bicycle parking, lockers, and showers; and enhancing the pedestrian environment through the provision of landscape elements for a more comfortable environment for pedestrians. Furthermore, the Project would also promote healthy living by encouraging active travel modes and would generate lower VMT per capita for employees than the average for the area, thus reducing air pollutants. The Project would not displace existing housing; rather, it would convert a surface parking lot into an active development with an office component and local-serving commercial space. Therefore, the Project would not conflict with the applicable policies of the Plan for a Healthy Los Angeles.

**Table IV.I-2  
Project Consistency with Plan for a Healthy Los Angeles**

| <b>Applicable Policies</b>                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Would the Project Conflict?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b><u>Policy 2.11 Foundation for Health</u></b><br/>Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure deficiencies that threaten the health, safety, and well-being of the most vulnerable users.</p> | <p><b>No Conflict.</b> While this policy applies to the City and not private development projects, the Project would support active transportation through pedestrian enhancements, such as wider sidewalks on North Alameda Street, West College Street, and North Main Street along the Project Site frontages, a passenger loading area and pavement treatment to provide a seamless connection between the internal pedestrian walkways and the public sidewalks on Bruno Street, and publicly accessible outdoor amenities, within and along the Project Site frontages. Overall, the Project would provide safe, attractive, and comfortable facilities that would support active transportation. Therefore, the Project would not conflict with Plan for a Healthy Los Angeles Policy 2.11.</p> |
| <p><b><u>Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction</u></b><br/>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><b>No Conflict.</b> While not applicable to private development projects, the Project would not conflict with this policy because it is estimated to generate lower work VMT per employee than the average for the area with implementation of Mitigation Measure TR-MM-1 as discussed under Threshold (b), below. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita. Furthermore, as discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts related to air quality during both construction and operation. Therefore, the Project would not conflict with Plan for a Healthy Los Angeles Policy 5.7.</p>                                                                            |
| <p><sup>a</sup> 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).<br/>Source: Gibson Transportation, 2024 and the Department of City Planning, 2025.</p>                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

**(c) Central City North Community Plan**

A detailed analysis of the Project's potential to conflict with the applicable transportation-related policies of the Central City North Community Plan is provided in Table IV.I-3 on page IV.I-39. As discussed therein, the Project would expand employment opportunities near accessible transit and provide publicly accessible outdoor amenities and landscaped spaces to serve the recreational, environmental, and health needs of the community. The Project would enhance pedestrian activity by providing new landscaping, widening sidewalks, and locating retail/restaurants uses on the ground floor. The Project would also encourage bicycle activity through the provision of bicycle parking, lockers, and showers on-site. Additionally, the Project would provide a pedestrian drop-off area and

**Table IV.I-3  
Project Consistency with the Central City North Community Plan**

| <b>Applicable Policies</b>                                                                                                                                                                                        | <b>Would the Project Conflict?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy 10-1.1:</b> Coordinate with the MTA to improve local bus service to and within the Central City North community and on a Bus Restructuring Program for the area.                                        | <b>No Conflict.</b> While not applicable to private development projects, the Project would coordinate with the appropriate agencies regarding any improvements to local transit infrastructure (e.g., benches, shelters, lighting, signage, etc.) in the area, as needed. Therefore, the Project would not conflict with the Central City North Community Plan Policy 10-1.1.                                                                                                                                                                          |
| <b>Policy 10-1.2:</b> Encourage the provision of safe, attractive and clearly identifiable transit stops with user friendly design amenities.                                                                     | <b>No Conflict.</b> An existing bus stop is located along North Alameda Street adjacent to the Project Site frontage. While not applicable to private development projects, the bus stop would be maintained at its current location. Any necessary adjustments to the bus stop would be coordinated with LADOT and other appropriate agencies, including Metro. The Project would not preclude future implementation of transit stop improvements. Therefore, the Project would not conflict with the Central City North Community Plan Policy 10-1.2. |
| <b>Policy 11-1.1:</b> Install ATSAC equipment at an accelerated rate with expanded funding.                                                                                                                       | <b>No Conflict.</b> While not applicable to private development projects, the Project would not preclude any future improvements to Automated Traffic Surveillance and Control (ATSAC) equipment. The majority, if not all, signalized intersections within the City are currently equipped with both ATSAC and Adaptive Traffic Control System (ATCS). Therefore, the Project would not conflict with the Central City North Community Plan Policy 11-1.1.                                                                                             |
| <b>Policy 12-1.1:</b> 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.) | <b>No Conflict.</b> The Project is a non-residential development and would implement a TDM Program to encourage employees and visitors to use alternative modes of transportation, including public transit, carpool/vanpool, biking/scooter, and walking. Therefore, the Project would not conflict with the Central City North Community Plan Policy 12-1.1.                                                                                                                                                                                          |
| <b>Policy 12-1.3:</b> Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.                                                                     | <b>No Conflict.</b> The Project is a non-residential development and would submit a TDM Plan to the City for approval, as required. Therefore, the Project would not conflict with the Central City North Community Plan Policy 12-1.3.                                                                                                                                                                                                                                                                                                                 |
| <b>Policy 12-1.4:</b> TDM measures in Central City North should be consistent with adopted City policy.                                                                                                           | <b>No Conflict.</b> The proposed TDM strategies discussed in Section 4B of the Transportation Assessment included as Appendix I of this Draft EIR would be consistent with adopted City policy. Therefore, the Project would not conflict with the Central City North Community Plan Policy 12-1.4.                                                                                                                                                                                                                                                     |
| <b>Policy 13-1.1:</b> Plan for and encourage funding and construction of bicycle facilities connecting residential neighborhoods to schools, open space areas, and employment centers.                            | <b>No Conflict.</b> While not applicable to private development projects, the Project would not preclude any future implementation of bicycle infrastructure. North Main Street has been identified as part of the BEN in the Mobility Plan. Access to the Project Site is not proposed along this roadway and would not disrupt the proposed on-street bicycle facilities. Additionally, the Project would encourage                                                                                                                                   |

**Table IV.I-3 (Continued)**  
**Project Consistency with the Central City North Community Plan**

| Applicable Policies                                                                                                                                                                                                              | Would the Project Conflict?                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                  | bicycling as it would provide bicycle parking and amenities, such as showers, lockers/storage, and repair stands. Therefore, the Project would not conflict with the Central City North Community Plan Policy 13-1.1.                                                                                                                                                                                                                                                                                    |
| <b>Policy 13-1.3:</b> Assure that local bicycle facilities are linked with the facilities of neighboring areas of the City.                                                                                                      | <b>No Conflict.</b> While not applicable to private development projects, the Project would not preclude any future implementation of bicycle infrastructure. No bicycle facilities are currently provided adjacent to the Project Site. North Main Street has been identified as part of the BEN identified in the Mobility Plan. Therefore, the Project would not conflict with the Central City North Community Plan Policy 13-1.2.                                                                   |
| <b>Policy 13-1.4:</b> Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public spaces.                                                            | <b>No Conflict.</b> The Project would provide 123 long-term and 26 short-term bicycle parking spaces and bicycle amenities, such as showers, lockers/storage, and repair stands, as part of a non-residential development. Therefore, the Project would not conflict with the Central City North Community Plan Policy 13-1.4.                                                                                                                                                                           |
| <b>Policy 13-2.1:</b> Encourage the safe utilization of easements and/or rights-of-way along flood channels, public utilities, railroad rights-of-way, and streets wherever feasible for the use of bicycles and/or pedestrians. | <b>No Conflict.</b> The Project would provide a one-foot dedication on both North Alameda Street and West College Street and a three-foot dedication on North Main Street along the Project Site frontages to provide wider pedestrian sidewalks. The Project would also provide pavement treatment along Bruno Street to provide a seamless connection to public sidewalks. Therefore, the Project would not conflict with the Central City North Community Plan Policy 13-2.1.                         |
| <b>Policy 13-2.2:</b> Require the installation of sidewalks with all new roadway construction and significant reconstruction of existing roadways.                                                                               | <b>No Conflict.</b> Although the Project would not involve new roadway construction or reconstruction of existing roadways, the Project would include a one-foot dedication on both North Alameda Street and West College Street and a three-foot dedication on North Main Street along the Project Site frontages to provide wider pedestrian sidewalks. Therefore, the Project would not conflict with the Central City North Community Plan Policy 13-2.2.                                            |
| <b>Policy 14-1.1:</b> Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto the arterial.                                                                                            | <b>No Conflict.</b> Vehicular access to/from the parking garage would be provided at one driveway on West College Street. A separate driveway to the loading area is also provided on West College Street. Furthermore, no driveways are proposed along North Alameda Street or North Main Street, and as such, the Project would not introduce new ingress and egress points onto arterial streets. Therefore, the Project would not conflict with the Central City North Community Plan Policy 14-1.1. |
| <b>Policy 14-1.2:</b> New parking lots and garages shall be developed in accordance with design standards.                                                                                                                       | <b>No Conflict.</b> The Project's parking garage and driveways would be designed in compliance with City design standards. Therefore, the Project would not conflict with the Central City North Community Plan Policy 14-1.2.                                                                                                                                                                                                                                                                           |

**Table IV.I-3 (Continued)**  
**Project Consistency with the Central City North Community Plan**

| Applicable Policies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Would the Project Conflict?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Policy 16-1.1:</b> To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multimodal transportation (e.g., walking, bicycling, driving and taking public transit) and safety, maintain a satisfactory LOS for streets that should not exceed LOS "D" for Boulevards, Avenues, and Collector Streets. If existing levels of service are LOS "E" or LOS "F" on a portion of a arterial or collector street, then the level of service for future growth should be maintained at LOS "E", where feasible and consistent with the policies of the Mobility Plan.</p> | <p><b>No Conflict.</b> Under SB 743, the focus of transportation analysis shifted from vehicular delay LOS to VMT. Thus, a project's CEQA transportation related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for purposes of identifying a project's CEQA transportation-related impacts. Nevertheless, Section 5B of the Transportation Assessment details the non-CEQA LOS operations at the nearby study intersections selected for operational evaluation. The Project would provide pedestrian enhancements around the Project Site, including wider sidewalks, landscaping elements, crosswalk improvements, and publicly accessible outdoor amenities. The Project would implement various TDM strategies as part of its TDM program to encourage employee and visitor use of public transit, carpooling/vanpooling, and biking/scooter to work, and support strategies to further promote alternative transportation modes and reduce single-occupancy trips to the Project Site. Therefore, the Project would not conflict with the Central City North Community Plan Policy 16-1.1.</p> |
| <p><sup>a</sup> Additional Community Plan objectives and policies that are applicable to the Project are discussed in Section IV.G, Land Use, of this Draft EIR.</p> <p><sup>b</sup> Central City North Community Plan, Los Angeles Department of City Planning, 2001.</p> <p>Source: Gibson Transportation, October 2024, and Department of City Planning, 2025.</p>                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

pavement treatment on Bruno Street which would allow for a safe pedestrian environment and the preservation of a designated historic resource. The Project would coordinate with the appropriate agencies and LADOT regarding any improvements to the existing bus stop on North Alameda Street adjacent to the Project Site. Lastly, as further discussed below, the Project would implement a TDM program that would encourage employees and patrons of the Project to utilize alternative modes of travel. Thus, as detailed in Table IV.I-3 on page IV.I-39, the Project would promote and encourage development consistent with the transportation-related goals and objectives of the Central City North Community Plan.

*(d) LAMC*

*(i) LAMC 12.21 A.16 (Bicycle Parking)*

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. The Project is required to provide a minimum of 75 bicycle parking spaces pursuant to the LAMC 12.21 A.16(a)(2) for the Project's uses. The Project would exceed this requirement and provide approximately 149 bicycle parking spaces, comprised

of 123 long-term spaces and 26 short-term spaces. Therefore, the Project would not conflict with LAMC Section 12.21 A.16.

*(ii) LAMC 12.26 G (TDM Ordinance)*

LAMC Section 12.26 G establishes TDM requirements for projects with at least 25,000 square feet of non-residential floor area, such as the Project. The Project would implement TDM strategies that would include:

- Promotions and marketing (i.e., informational bulletin boards or digital displays) to educate and inform employees and visitors to the Project Site of available mobility options
- Passenger loading activities would occur along Bruno Street at the passenger loading area, as well as on-site in the parking garage
- Internal and external pedestrian connections to the public sidewalks and access to on-site bicycle parking areas
- Pedestrian enhancements surrounding the Project Site, such as wider sidewalks, street trees, publicly accessible outdoor amenities, and landscaping elements for a more comfortable environment
- A bus stop serving DASH Lincoln Heights/Chinatown is located on North Alameda Street adjacent to the Project Site and, as such, the Project would coordinate with the appropriate agencies and LADOT regarding any improvements to the existing bus stop.

Thus, the Project would not conflict with LAMC Section 12.26 G.

*(e) Vision Zero*

As discussed above, the Project Site is not adjacent to any roadways that are a part of the HIN. Near the Project Site, West College Street between Spring Street (south leg) and Yale Street is identified in the HIN. The Project would, nevertheless, provide the pedestrian enhancements described above along the Project Site frontages to improve the overall pedestrian experience, such as wider sidewalks, street trees, publicly accessible outdoor amenities, and landscaping elements. The Project improvements to the pedestrian environment would not preclude any future Vision Zero Safety Improvements by the City. Therefore, the Project would not conflict with Vision Zero.

*(f) Streetscape Plans*

None of the City's established Streetscape Plans would affect the Project Site, and, therefore, streetscape plans do not apply to the Project, and there is no potential for conflict. Nevertheless, the Project would enhance the Project Site's street frontages through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience. Specifically, the Project would include new landscaping along North Alameda Street, West College Street, North Main Street, and Bruno Street. These perimeter areas would include landscaping, such as street trees and shrubs. Furthermore, the Project would provide wider sidewalks which would further enhance the streetscape.

*(g) Citywide Design Guidelines*

The Pedestrian-First Design approach of the Citywide Design Guidelines identifies design strategies that "create human-scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of pedestrian travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety." The Pedestrian-First Design guidelines applicable to the Project are as follows:

*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.*

Consistent with the Citywide Design Guidelines, the Project would provide pedestrian enhancements, including wider sidewalks, pedestrian connections throughout the Project Site, and publicly accessible outdoor amenities. As needed and required, the Project would upgrade existing crosswalks at the adjacent signalized intersection of North Alameda Street and West College Street and the existing DASH stop on North Alameda Street near the northwestern corner of the Project Site. New street trees and other landscaping elements would be incorporated to provide adequate shade and create a more comfortable environment for pedestrians. In addition, the proposed driveways would be separate from the pedestrian access points to minimize vehicular-pedestrian conflicts. Further, the active ground floor facilities would ensure that the Project engages with the street and its surrounding uses. Therefore, the Project would not conflict with the transportation-related Citywide Design Guidelines.

*(h) 2024–2050 RTP/SCS*

As discussed in detail in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would not conflict with 2024–2050 SCAG RTP/SCS policies related to encouraging pedestrian activity and reducing VMT. As indicated therein, the Project would improve mobility and accessibility, encourage transit use, and reduce VMT and GHG emissions. These would be achieved by intensifying urban density within a TPA and an HQTC in close proximity to transit; providing complementary new uses (i.e., office and retail/restaurant) in close proximity to existing residential and other commercial uses; providing pedestrian and bicycle improvements; providing EV charging stations; implementing TDM measures; and supporting healthy and equitable communities by encouraging walking and bicycling. Therefore, the Project would not conflict with the 2024–2050 RTP/SCS

*(i) Conclusion*

**Based on the above, the Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.**

**(2) Mitigation Measures**

Project-level impacts with regard to conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

**(3) Level of Significance After Mitigation**

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

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

**(1) Impact Analysis**

As discussed above, the Project Site is located in the Central APC area and is subject to the LADOT threshold of 7.6 work VMT per employee for determining VMT impacts for commercial projects. The City's VMT Calculator (Version 1.4, June 2023) was used to evaluate Project VMT and compare it to the VMT impact criterion. The VMT Calculator worksheets for the Project are included as Appendix D of the Transportation Assessment.

The Project's proposed land uses and their respective sizes are the primary input in the VMT Calculator. As discussed in Section II, Project Description, of this Draft EIR, the Project would include 232,802 square feet of new development comprised of 224,597 square

feet of office uses, 4,110 square feet of retail uses, and 5,894 square feet of restaurant uses, including the restaurant outdoor seating area.

The Project does not include any residential uses. Therefore, the Project would not generate any household VMT per capita and would not result in a significant household VMT impact, and non-office commercial uses (i.e., small-scale non-office commercial components less than 50,000 sf) are assumed to have a negligible effect on VMT and are not considered for the purposes of identifying significant VMT impacts. Nonetheless, the following VMT analyses account for the local-serving non-office commercial uses as part of the total daily work VMT for a more conservative analysis.

The Project includes the following elements that were accounted for in the VMT evaluation:

- Reduced parking supply using allowable parking reduction rates from standard LAMC requirements.
- Parking cash out opportunities/incentives, which require certain employers who provide subsidized parking to offer employees a cash allowance in lieu of a parking space.
- Promotions and marketing to educate and inform travelers about site-specific transportation options and the effects of travel choices.
- Secure bicycle parking that meets LAMC requirements, including short-term and long-term parking facilities, to support safe and comfortable bicycle travel by providing end-of-trip amenities.
- Pedestrian network improvements, within and around the Project Site, to improve pedestrian circulation and encourage walking.

Based on the VMT Calculator results, as summarized in Table IV.I-3 on page IV.I-39, the Project's office uses would result in a work VMT per capita of 8.1, which would exceed the 7.6 work VMT per employee thresholds. **Therefore, pursuant to CEQA Guidelines Section 15064.3(b), the VMT impacts resulting from the Project would be significant.**

## (2) Mitigation Measures

The following mitigation measure is proposed to reduce impacts related to VMT:

**Mitigation Measure TR-MM-1:** The Project shall implement the following Transportation Demand Management policy:

- Implement a ride-share program by matching interested employees with similar commutes into carpools and vanpools. The Project shall provide designated parking areas and safe and convenient passenger loading areas for employee carpools/vanpools on-site and along Bruno Street.

### (3) Level of Significance after Mitigation

With the implementation of Mitigation Measure TR-MM-1 which requires a carpool/vanpool program to reduce single-occupancy vehicle trips, the Project would result in a work VMT per employee of 6.8, which is below the Central APC significance threshold of 7.6. **As such, impacts with respect to Threshold (b) would be less than significant with mitigation incorporated.**

***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

#### *(a) Geometric Design Features*

As evaluated in the Initial Study, included as Appendix A of this Draft EIR, the Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). In addition, the Project's 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. **Thus, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts with respect to Threshold (c) regarding hazards due to a geometric design feature or compatible uses were determined to be less than significant. No further analysis is required.**

#### *(b) Freeway Safety Analysis*

As discussed above in the Methodology subsection, the City's Freeway Guidance requires analysis of freeway off-ramps where a proposed development project adds 25 or more trips in either the A.M. or P.M. peak hour to be studied for potential queueing impacts. If the proposed project is not projected to add 25 or more peak-hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As identified in the Transportation Assessment, the Project would add 25 or more peak-hour trips to the following off-ramps during the A.M. and P.M. peak hours:

- SR-110 Northbound Off-Ramp to Hill Street
- SR-110 Southbound Off-Ramp to Hill Street

As detailed in the Transportation Assessment, a Project freeway safety analysis of Caltrans facilities was conducted for the Future without and with Project Conditions for 2028. 2028 traffic volumes were forecasted based on available traffic volume data at the off-ramps in 2018.<sup>21</sup> The traffic volumes were adjusted with both ambient growth (1 percent per year) and traffic generated by related projects.

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 2028, which include growth and traffic from related projects, both without and with Project traffic. As detailed in the Transportation Assessment, under Future with Project conditions, the queues at the two off-ramps identified above would not exceed the ramp storage length during any of the analyzed peak hours and would not be subject to a speed differential analysis. The queues at the two off-ramps would not extend onto the freeway mainline and would not result in a significant safety constraint. **Thus, impacts related to freeway safety would be less than significant.**

## (2) Mitigation Measures

Project-level impacts related to hazardous geometric design features associated with freeway safety would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance after Mitigation

Project-level impacts related to hazardous geometric design features associated with freeway safety were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant without mitigation.

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

As evaluated in the Initial Study for the Project, included as Appendix A of this Draft EIR, the nearest emergency/disaster route to the Project Site is North Alameda Street adjacent to the Project Site to the west. While it is expected that the majority of construction

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<sup>21</sup> Freeway ramp volumes were based on available published data in Caltrans' Traffic Census Program, which consists of the annual average daily traffic (AADT) volumes, as well as peak hour percent of AADT factor ("K factor"), which were used to develop peak hour volumes at the two off-ramps.

activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with the CTMP prepared pursuant to Project Design Feature TR-PDF-1 to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, compliance with applicable City Building Code and Fire Code requirements, including those pertaining to emergency access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. **Therefore, the Project would not result in inadequate emergency access, and impacts related to Threshold (d) would be less than significant, and no further analysis is required.**

## e. 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 the related projects within 0.5 miles of the Project Site and any transportation system improvements in the vicinity of the Project Site. As shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, a total of 21 related projects are located generally within 0.5 miles of the Project Site. The related projects comprise a variety of uses, including residential, commercial, hotel, and office 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 Project buildout year (i.e., 2028) 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 J apply to projects individually. In addition, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable transportation policies. Lastly, as indicated in the Project-level analysis under Threshold (a) above, the Project would not result in significant inconsistencies with applicable transportation programs, plans, policies, and ordinances. As such, the Project's contribution to impacts associated with inconsistencies with applicable transportation policies would not be cumulatively considerable. **Therefore, cumulative impacts of the Project with respect**

**to conflicts with transportation-related programs, plans, policies, and ordinances would be less than significant.**

*(b) Vehicle Miles Traveled*

As detailed in the TAG, for projects that result in a less-than-significant Project-level impact related to VMT, this conclusion is deemed sufficient in demonstrating there is no cumulative VMT impact, provided those projects are shown to align with the long-term VMT and greenhouse gas reduction goals of the RTP/SCS. As discussed above in the analysis for Threshold (a), and Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would not conflict with the applicable goals of the 2024–2050 RTP/SCS. With respect to VMT, with the implementation of Mitigation Measure TR-MM-1 which requires the implementation of a carpool/vanpool program, impacts would be less than significant. **Therefore, with implementation of Mitigation Measure TR-MM-1, the Project's cumulative impacts with respect to VMT would be less than significant.**

*(c) Hazardous Geometric Design Features*

According to the TAG, a cumulative impact analysis for potential geometric design or land use hazards should consider the effect of access to related projects in the same block as the Project Site. Related Project No. 5, which is located at 129 West College Street and 924 North Spring Street, is located on the other side of West College Street. Related Project No. 5 involves an existing building that would be converted from manufacturing to mixed-use. Related Project No. 5 proposes vehicular access only along Spring Street, north of West College Street. As such, the driveway locations for the Project and Related Project No. 5 would not be proposed along the same block, create vehicle turn conflicts, or impose significant safety issues. In addition, as discussed in the Project-level analysis under Threshold (c) above, the Project would not result in a significant impact associated with hazardous geometric design features associated with freeway safety. As such, the Project's contribution to impacts related to hazardous features and freeway safety would not be cumulatively considerable. **Therefore, the cumulative impacts of the Project with respect to hazardous geometric design features, including safety, operational, or capacity impacts, would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts with respect to conflicts with adopted plans, programs, ordinances, and policies and hazardous geometric design features would be less than significant.

Implementation of Mitigation Measure TR-MM-1 requiring implementation of a carpool/vanpool program would reduce the Project's VMT impact to a less than significant level.

### (3) Level of Significance After Mitigation

Impacts related to conflicts with plans and hazardous geometric design features 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.

With the implementation of Mitigation Measure TR-MM-1 requiring a carpool/vanpool program, the Project's VMT impact, individually and cumulatively, would be less than significant.