3.12 Transportation/Traffic

This chapter describes the regulatory setting, existing transportation/traffic conditions of the proposed Project (Project) and the potential impacts that would result from its implementation.

3.12.1 Regulatory Setting

A review of the various regulatory requirements was conducted to identify regulations that address traffic and transportation. This section summarizes the various regulatory requirements that are relevant to the Project. The Project is discussed in Chapter 2.0, *Project Description*.

3.12.1.1 Federal

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the *Americans with Disabilities Act of 1990* (ADA) have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination on the basis of disability in "places of public accommodation" (businesses and nonprofit agencies that serve the public) and "commercial facilities" (other businesses). The regulations promulgated to implement ADA include *Appendix A to 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 travelway and a vibration-free zone for pedestrians.

3.12.1.2 State

Congestion Management Program

The *Congestion Management Program* (CMP) is a state-mandated program enacted by the California State legislature to address the increasing concern that urban congestion is affecting the economic vitality of the state and diminishing the quality of life in some communities. The hallmark of the CMP is that it is intended to address the impact of local growth on the regional transportation system. Statutory requirements of the CMP include monitoring Level of Service (LOS) on the CMP Highway and Roadway network, measuring frequency and routing of public transit, implementing the Transportation Demand Management and Land Use Analysis Program and helping local jurisdictions meet their responsibilities under the CMP. The CMP pertains specifically to new or additional traffic trends in the region's freeways or at designated monitoring stations. The CMP evaluates traffic trends by measuring circulation performance at freeways and at designated monitoring stations. Designated monitoring stations are located across the Los Angeles County (County) at selected major arterial intersections.

Senate Bill 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the California Environmental Quality Act (CEQA) for several categories of development projects including the

development of infill projects in transit priority areas. SB 743 also intends to balance the needs of congestion management with State-wide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. SB 743 adds Chapter 2.7: Modernization of Transportation Analysis for Transit Oriented Infill Projects to the CEQA Statute (Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, SB 743 mandates that alternative metric(s) for determining impacts relative to transportation shall be developed to replace the use of Level of Service (LOS) in CEQA documents. Under SB 743, the focus of transportation analysis changes from vehicle delay to vehicle miles traveled (VMT).

VMT Guidelines

The California Governor's Office of Planning and Research (OPR) released two rounds of chapter proposals for updating the CEQA Guidelines related to evaluating transportation impacts and, after further study and consideration of public comment, submitted a final set of revisions to the Natural Resources Agency in November 2017. The Natural Resources Agency evaluated the updates to the CEQA Guidelines, and the Office of Administrative Law approved the revised CEQA Guidelines on December 28, 2018.

The December 2018 updates to the State CEQA Guidelines in support of these goals establish VMT as the primary metric for evaluating a project's impacts on the environment and transportation system. The revised guidelines require that a project's environmental assessment must assess and disclose whether it conflicts or is inconsistent with local plans or policies. The revised guidelines also state, among other things, that "transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less-than-significant transportation impact."

OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) provides recommendations regarding significance thresholds for development projects with common land use types, for general plans, and for transportation projects. It lists more than two dozen types of transportation projects that would most likely not lead to a substantial or measurable increase in vehicle travel and therefore should not require an induced travel analysis. Among them are "rehabilitation, maintenance, replacement, safety and repair projects designed to improve the condition of existing transportation assets ([…] pedestrian facilities) and that do not add additional motor vehicle capacity."

3.12.1.3 Local and Regional

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

The Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law and was established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura), 191 cities in an area covering more than 38,000 square miles, and six County Transportation Commissions that hold the primary responsibility for programming and implementing transportation projects, programs, and services in their respective counties.

SCAG is designated under federal law as a Metropolitan Planning Organization (MPO) and as a Regional Transportation Planning Agency and a Council of Governments under state law. SCAG Bylaws provide for representation of Air Districts in the region. SCAG develops long-range regional transportation plans including growth forecast components, regional transportation improvement programs, and a portion of the South Coast Air Quality Management District's air quality management plans.

According to SCAG, their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range visioning plan that balances future mobility and transportation needs with economic, environmental and public health goals. The RTP/SCS consists of a vision for the region's future and is developed with input from local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations, businesses, and local stakeholders within their region.

There are over 4,000 transportation projects from local county plans identified in the 2016–2040 RTP/SCS, including highway improvements, railroad grade separations, bicycle lanes, new transit hubs, replacement bridges, and pedestrian improvements. These future investments seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone (SCAG 2016).

Los Angeles County Congestion Management Program

The Los Angeles County CMP is a state-mandated program enacted by the California State Legislature with the passage of Proposition 111 in 1990, administered by the Los Angeles County Metropolitan Transportation Authority (Metro). The purpose of the CMP is to develop a coordinated approach to managing and decreasing traffic congestion by linking the various transportation, land use, and air quality planning programs throughout the County. One required element of the CMP is a process to evaluate the transportation and traffic impacts of large projects on the regional transportation system. That process is undertaken by local agencies, project applicants, and traffic consultants through a transportation impact report usually conducted as part of the CEQA project review process.

The 2010 CMP for the County (adopted October 28, 2010) was developed, in part, to link local land use decisions with their impacts on regional transportation. The CMP identifies a system of highways and roadways, and establishes a minimum LOS performance measurements of LOS E (except where the 1992 base year LOS is worse than E, in which case base year LOS is the standard) for highway segments and key roadway intersections on this system. A traffic impact analysis (TIA) is required for projects that generate at least 50 new trips at CMP monitoring intersections or 150 one-way trips on mainline freeway monitoring locations during either the AM or PM peak hour on weekdays (Metro 2010).

Great Streets for Los Angeles – Los Angeles Department of Transportation Strategic Plan

In September 2014, the Mayor's Office and City of Los Angeles (City) Department of Transportation (LADOT) released Great Streets for Los Angeles, LADOT's first strategic plan to turn the City's essential infrastructure—its streets and sidewalks—into safer, more livable 21st-century public spaces that accommodate everyone who uses them. The LADOT Strategic Plan builds upon Mayor Garcetti's Great Streets Initiative, which looks at Los Angeles's streets as valuable assets which can be used to revitalize neighborhoods across the City and make mobility easier for residents, whether they walk, bike, drive, or take transit. The plan also stresses the importance of working closely with

other City and regional agencies, such as the Bureau of Street Services and Metro, to provide safe, accessible transportation services and infrastructure. The 2018–2020 update to *Great Streets for Los Angeles* identifies the progress on commitments made in the 2014 edition of the strategic plan, approximately 70 percent of which were successfully completed (LADOT 2018).

City of Los Angeles General Plan

Community Plans

Community plans guide the physical development of neighborhoods by establishing the goals and policies for land use. The 35 distinct community plans compose the Land Use Element of the General Plan, a state-required element. While the City General Plan sets out a long-range vision and guide to future development, the community plans provide the specific, neighborhood-level detail, transportation network, relevant policies, and implementation strategies necessary to achieve the General Plan objectives. Policies and objectives of these plans that pertain to transportation focus on continued improvements to the public transportation and circulation system.

Mobility Plan 2035

The City Mobility Plan 2035, adopted on September 7, 2016, provides the policy foundation for achieving a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element (last adopted in 1999), Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how future generations of residents interact with their streets. The Mobility Plan contains policies that pertain to maintaining safe and attractive sidewalks.

2010 Bicycle Plan

The City 2010 Bicycle Plan (Bicycle Plan), adopted on March 1, 2011, is a component of the Transportation Element of the City's General Plan (later renamed to Mobility Plan 2035) (Los Angeles Department of City Planning 2011). The purpose of the Bicycle Plan is to increase, improve, and enhance bicycling in the City as a safe, healthy, and enjoyable means of transportation and recreation. The Bicycle Plan establishes policies and programs to increase the number and type of bicyclists in the City and to make every street in the City a safe place to ride a bicycle.

The Bicycle Plan has been updated to reflect public input received since it was originally adopted in 2011. The Bicycle Plan, in its entirety, has been incorporated into the Mobility Plan 2035 and is no longer a standalone chapter devoted to a single mode but instead reflects the City's commitment to a holistic and balanced complete street approach that acknowledges the role of multiple modes (pedestrians, bicycles, transit, and vehicles).

Los Angeles Municipal Code

Los Angeles Municipal Code (LAMC) Section 12.37 contains requirements related to highway and collector street dedication and improvement. LAMC Section 17.05 contains standards that that have been updated to expand the role of the Street Standards Committee and to reflect the City's new focus on complete streets.

LAMC Section 62.61 states that temporary lane closures resulting from non-emergency construction along major and secondary highways or collector streets would be limited to off-peak hours. Permits may be issued on a case-by-case basis to provide exemption.

3.12.2 Environmental Setting

The Project would be limited to areas within the City with existing sidewalks. Refer to the Chapter 2, *Project Description*, for a detailed discussion of existing sidewalk infrastructure. This section describes the environmental setting or conditions related to traffic and transportation in the Project vicinity, which represents the baseline required to evaluate the Project's impacts.

The City includes access to a variety of transportation modes, including regional freeway access, an extensive local roadway network, local and regional transit systems, an existing bikeway network, and sidewalk network.

3.12.2.1 Existing Street System

Regional Access

The City has a freeway network that includes Interstates (I-), United States Highways (US-), and State Routes (SR-). Bicycles and pedestrians are not allowed on freeways, but are allowed on state highways that function as arterial roads. Portions of state highways, including Pacific Coast Highway (SR-1), Santa Monica Boulevard (SR-2), and Venice Boulevard (SR-187), are currently designated as part of the citywide bikeway network. Freeways and state highways also accommodate transit vehicles.

Local Roadway Network

The City has approximately 7,500 miles of public streets that accommodate a variety of motorized and non-motorized vehicles, including private motor vehicles, taxis, freight vehicles, transit vehicles, and bicycles. The Mobility Plan 2035 includes numerous functional classifications: Boulevard I, Boulevard II, Avenue I Avenue II, Avenue III, Collector Street, Industrial Collector Street, Local Standard, Local Limited, Industrial Local, Pedestrian Walkway, Shared Street, Access Roadway, One-Way Service Road-Adjoining Arterial Streets, Bi-Directional Service Road-Adjoining Arterial Streets, Hillside Collector, Hillside Local, and Hillside Limited Standard. The majority of the Boulevard, Avenue, and Collector Street roadway network within the City is laid out in a grid pattern and roadway users generally have multiple route options for traveling through the City (City of Los Angeles 2016).

Emergency Access

California state law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. Generally, multi-lane arterial roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. The Los Angeles Fire Department (LAFD), in collaboration with LADOT, has developed a Fire Preemption System, a system that automatically turns traffic lights to green for emergency vehicles travelling on designated streets in the City.

Existing Public Transit Service

The City is served by multiple transit operators. Metro is the primary transit operator within the City. Metro operates local bus, rapid bus, busway service, light rail, and heavy rail throughout the City. Local jurisdictions, including the City of Los Angeles, operate additional service. LADOT operates local DASH service as well as commuter bus routes. Several other municipal bus operators provide additional transit service connecting the City to neighboring jurisdictions and counties.

Existing Bicycle Facilities

Bikes are legally permitted to operate on any Boulevard, Avenue, Collector Street, or Local Street with or without specific bicycle lane designation. LAMC Section 56.15 prohibits the use of bicycles, unicycles, skateboards, carts, wagons, or any other device moved exclusively by human power, on sidewalks in a "willful or wanton disregard for the safety of persons or property."

3.12.3 Environmental Impact Analysis

3.12.3.1 Approach

For the purposes of assessing the traffic impact on adjacent roadways, the construction and operation traffic trip generation arising from the Project were qualitatively evaluated. In determining the level of significance, the assessment assumed that the continuing construction and operational activities arising from the Project would comply with relevant regulations, ordinances, and guidance presented below as part of Section 3.12.3.2, Project Design Features.

The continuing construction activity from the Project would occur across the entire City, and the effect on traffic would not be considered additive. Impacts would not be based on citywide activity because of the geographic distribution of construction sites. Instead, they would be evaluated for two prototypical construction scenarios.

3.12.3.2 Project Design Features

Key elements of the Project related to transportation that are considered project design features are identified below:

- **PDF-TR-1:** Per the California Manual of Uniform Traffic Control Devices, the construction manager is responsible for ensuring that all work is in full compliance with the current edition of the Work Area Traffic Control Handbook (WATCH) manual, including the requirement of flaggers in Section 9 (Flagger Temporary Traffic Control) for lane closures during street tree removal or other any other construction activity that disrupts the flow of vehicles, pedestrians, or bicyclists.
- **PDF-TR-2:** When construction occurs at an intersection, stopping sight distance would be maintained for vehicles and bicyclists approaching the intersection, per WATCH Flagger Temporary Traffic Control.
- **PDF-TR-3:** Adjacent property owners, whether public or private, would be notified of any upcoming construction. Signage would also be posted in advance of construction, notifying the public of any construction-related lane closures or parking restrictions, in accordance with Section 7-10, Public Convenience and Safety, and Section 302-4.5, Scheduling, Public Convenience and Traffic Control, of the Standard Specifications of Public Works Construction, or the "Greenbook" (2012).
- **PDF-TR-4:** Temporary accessibility-compliant access would be provided and signage would be used, where needed, to direct pedestrians to alternative pedestrian routes or through the use of a temporary walkway, physically separated from vehicle traffic, to provide a more direct detour, in accordance with Section 7-10, Public Convenience and Safety, of the Standard Specifications of Public Works Construction, or the "Greenbook" (2012).

- **PDF-TR-5:** If construction requires a temporary closure of an on-street bicycle facility, signage would be placed to inform drivers and bicyclists of the upcoming bicycle facility closure, indicating a shared lane ahead per WATCH Bicycle Considerations.
- **PDF-TR-6:** If construction requires a temporary closure of an existing transit facility (e.g., bus stop), the project manager shall be responsible for coordinating with the affected transit provider to ensure users are informed of the temporary stop relocations.
- **PDF-TR-7:** Per City's Department of Public Works *Brownbook 7th Edition*, in "Storage of Equipment and Materials," a permit from the Bureau of Street Services shall be obtained before any construction materials or equipment are stored in the public right-of way. All storage of equipment and materials shall be done under approved pollution prevention and erosion control plan as required by California Construction Permit Order No. 2009-009-DWQ.
- **PDF-TR-8:** Truck trips would be coordinated to arrive and depart at off-peak commute times to the extent feasible, pursuant to LAMC Section 62.61.
- **PDF-**TR-9: Any work involving signal disruption would be coordinated with LADOT and the Los Angeles Police Department (LAPD) to identify and implement temporary traffic control needs per the 2012 "Greenbook" Standard Specification for Public Works Construction Section 307-5 et seq., Temporary Street Lighting and Traffic Signal Systems.

3.12.3.3 Construction

Construction activity would occur Monday through Friday, with construction crews arriving at construction sites around 7:00 AM. Construction start times may be delayed to 9:00 AM for sites in busy areas without on-street parking.

This Draft EIR evaluates two prototypical construction scenarios. Each repair would be unique and the construction needs would vary depending several factors, including, but not limited to, the condition of the sidewalk, the adjacent land uses, how busy the adjacent street is, the level of pedestrian traffic, whether utilities need to be moved or street trees replaced, and the presence of a bus stop. PDF-TR-1 through PDF-TR-9 would be followed.

For analysis purposes, an average site is assumed to be 650 linear feet long and 5 feet wide for each scenario. This assumption is based on data gathered from past work. As a conservative approach, it is also assumed that each repair site would include a street tree removal when the street tree cannot survive root pruning. Each Construction Scenario 1 repair project is anticipated to take a minimum average of 5 work days to complete, while Construction Scenario 2 is anticipated to take 30 work days to complete. Both Construction Scenario 1 and Construction Scenario 2 may be occurring simultaneously throughout the City at any given time. Of the approximately total 12 crews at peak construction activity at the last 5 years of the Project, it is assumed that up to 11 crews would be working on a Construction Scenario 1 site on a given day. Construction Scenario 2 would be more intensive than Construction Scenario 1 and would include substantial utility repair work as well as crosswalk repaving. Only a single crew is assumed to be conducting repairs for Construction Scenario 2 on any given day during the last years of the Project because that is when the greatest amount of sidewalk repair sites will be repaired.

The removal and replacement of street trees would be incremental and would change every 5 years based on the specific individual project activity increase required by the *Settlement* in combination with the proposed Revised Street Tree Retention, Removal and Replacement for the Sidewalk Repair Project. For example, the Project would include planting approximately 2,900 replacement street

trees in the first 5 years and incremental planting of approximately 30,405 replacement street trees of the life of the Project. Street tree replacement to removal ratios would be 2:1 during Project years 1–10; 3:1 from years 11–21; and 2:1 from years 22–30. With respect to construction activities, the number of worker crews throughout the City at a given time is anticipated to increase every 5 years of the Project because of the increase in sidewalk repair (i.e., 298 repair sites annually in years 1–5, 344 annually in years 6-10, 396 annually in years 11–15, 457 annually in years 16–20, 527 annually in years 21–25, and 607 annually in years 26–30), as shown in Table 3.2-8 in Chapter 3.2, *Air Quality*.

Each construction scenario is discussed in detail below.

Construction Scenario 1: Sidewalk and/or Curb Ramp Repairs, Street Tree Removals and Replacements, and Minor Utility Work

For Construction Scenario 1, the construction would last approximately 5 days, at the minimum. The construction would be broken down into phases with varying numbers of worker trips and truck trips. Based on the resources available, the Project would involve up to 11 active Construction Scenario 1 sites per day.

Table 3.12-1 shows the trip generation estimates for the Project by phase. As shown in Table 3.12-1, the highest daily construction trip generation for an individual phase is estimated to be 26 daily trips and would occur during the concrete pouring phase. Under Construction Phase 1, up to three phases could be concurrent at an individual site. Assuming the three stages with the greatest potential trip generation (1. Mobilization, Traffic Control, Demolition and Removal; 2. Grading/Formwork; and 3. Concrete Pouring) would occur on the same day, up to a total of 62 one-way trips could be generated under Construction Scenario 1, for these three stages, as a result of worker commute trips and truck trips. Table 3.12-2 shows trip generation estimates per site, as well as the citywide total trips by year.

Table 3.12-1. Construction-Period Daily Trip Generation Estimates by Phase

Phase (Activity)	Event Length (Days)	Workers/ Site	Trucks/ Site	Daily Worker Trips	Daily Truck Trips	Total Daily Trip Gen.
1. Mobilization, Traffic Control, Demolition and Removal[a]	2	4	5	8	10	18
2. Grading/Formwork[a]	1	5	4	10	8	18
3. Concrete Pouring	1	9	4	18	8	26
4. Utility Adjustment[b]	2–20	5	2	10	4	14
4a. Street Tree Removal	1	5	2	10	4	14
4b. Street Tree Planting[c]	2	4	2	8	4	12
5. Crosswalk Repaving[d]	0–5	4	1	8	2	10
6. Cleanup[e]	1	4	3	8	6	14

[a] Trucks for this phase include water trucks.
[b] Under Construction Scenario 1, utility adjustment is expected to take 2 days; Under Construction Scenario 2, utility adjustment is expected to take up to 20 days.
[c] The street tree planting event length is based on the maximum activity duration under the 3:1 replacement scenario during years 11 to 21 of the program.
[d] Crosswalk repaving is not including as part of Construction Scenario 1; Under Construction Scenario 2, crosswalk repaving is expected to take up to 5 days. No more than one construction site is expected to be active under Construction Scenario 2 at any given time.
[e] Cleanup is estimated to require three workers/site under Construction Scenario 1 and four workers/site under Construction Scenario 2. The number of workers/site from Construction Scenario 2 is included above, which overstates impacts under Construction Scenario for this phase.

Table 3.12-2. Construction-Period Daily Trip Generation Estimates by Year

Years	Construction Scenario 1 Maximum Daily Trips Per Site[a]	Construction Scenario 2 Maximum Daily Trips Per Site[b]	Active Crew Teams[c]	Citywide Maximum Daily Trips[d]
1–5	62	76	6	386
6–10	62	76	7	448
11–15	62	76	8	510
16–20	62	76	9	572
21–25	62	76	11	696
26–30	62	76	12	758

Source: Anderson pers. comm.
[a] Under Construction Scenario 1, no more than three phases would be completed at each site during a particular day. To assume a conservative maximum trip generation scenario, the three construction phases with the greatest trip generation (1. Mobilization, Traffic Control, Demolition and Removal; 2. Grading/Formwork; and 3. Concrete Pouring) have been assumed to occur on the same day. In addition, different workers are assumed for each phase at a site, which likely overstates the number of trips. Approximately half of maximum daily trips would during a peak hour, which would not trigger the need for a TIA under the CMP guidelines.
[b] Under Construction Scenario 2, no more than four phases would be completed at each site during a particular day. To ensure a conservative maximum trip generation scenario, the four construction phases with the greatest trip generation (1. Mobilization, Traffic Control, Demolition and Removal; 2. Grading/Formwork; and 3. Concrete Pouring; and 4. Utility Adjustment) are assumed to occur on the same day. In addition, different workers are assumed for each phase at a site, which likely overstates the number of trips. Approximately half of maximum daily trips would during a peak hour, which would not trigger the need for a TIA under the CMP guidelines.
[c] The number of crew teams active at a given time would vary by year and level of funding.
[d] Citywide maximum daily trips assumes all but one of the crew teams would be working at a Construction Scenario 1 site, and the remaining crew team would work at a Construction Scenario 2 site.

Construction worker commute trips to the construction yard would occur prior to the AM peak hours, before 6:00 AM. Constructions workers would return to the construction yard by 3:00 PM and would commute home from there during the PM peak hours. Up to 18 worker commute trips (half of daily worker commute trips) per Construction Scenario 1 site could occur in the PM peak hours if three phases are worked at a site in a day. Up to 13 truck trips (half of daily truck trips) to the construction site could occur during the AM peak period, but would be timed to avoid peak hours as feasible.

With respect to construction activities, the number of worker crews throughout the City at a given time is anticipated to increase every 5 years of the Project because of the increase in sidewalk repair (i.e., 298 repair sites annually in years 1–5, 344 annually in years 6–10, 396 annually in years 11–15, 457 annually in years 16–20, 527 annually in years 21–25, and 607 annually in years 26–30).

It is assumed that up to 11 crews would be working on a Construction Scenario 1 site on a given day. Construction trip generation would vary from day to day based on how many crews are active and which construction phase is occurring. The Citywide Construction daily trip generation (including one crew at a Construction Scenario 2 site) would be 758 trips if all total 12 crews in years 26 through 30 were working on the maximum number of phases in a single day (three phases under Construction Scenario 1 and four phases under Construction Scenario 2). Project trip generation would be reduced earlier in Project implementation, assuming there would be fewer construction activities per day, compared to later years of the Project where additional crews would be present. It should be noted that trip generation would be geographically dispersed throughout the City, and effects would not be confined to one area at a time.

During Construction Scenario 1, short-term temporary parking restrictions and/or lane closures are expected when sites are in active construction. Full street closures may be required on small residential streets, but are expected to be infrequent and would not exceed a few hours at a time.

Construction Scenario 2: Sidewalk Repair with Curb Ramp Repairs, Crosswalk Repaving, Street Tree Removals and Replacements, and Substantial Utility Work

For Construction Scenario 2, the total construction would last for up to 30 days at each construction site. The construction would be divided into phases, with varying numbers of worker trips and truck trips. Based on the resources available, only a single instance of Construction Scenario 2 is anticipated per day.

As shown in Table 3.12-1, the highest daily construction trip generation for an individual phase is estimated to be 26 daily trips and would occur during the concrete pouring phase. Under Construction Phase 2, up to four phases could be concurrent at an individual site. Assuming the four construction phases with the greatest potential trip generation (1. Mobilization, Traffic Control, Demolition and Removal; 2. Grading/Formwork; 3. Concrete Pouring; and 4. Utility Adjustment) would occur on the same day, up to 76 one-way trips could be generated under Construction Scenario 2 as a result of worker commute trips and truck trips, Table 3.12-2 shows trip generation estimates per site, as well as the Citywide total trips by year.

Given that the construction worker commute trips would occur after 3:00 PM, construction for Construction Scenario 2 could generate up to 23 worker commute trips (half of daily worker commute trips) during the PM peak hours if four phases are worked at a site in a day. Up to 15 truck trips (half of daily truck trips) could occur during the AM peak period, but they would be timed to avoid peak hours as feasible.

Construction Scenario 2 is expected to involve more lane closures than Construction Scenario 1. The

substantial utility work would vary based on site conditions and required repairs. During the substantial utility adjustments, the electric power supply may need to be turned off, potentially affecting nearby traffic signal equipment.

3.12.3.4 Operations

The continuation of operational activities from the Project would include sidewalk inspection and street tree monitoring and watering with a hose that is attached to a water tank on a pick-up truck. During construction activities, the street trees would have been planted in a 4- by 6-foot street tree well, per the proposed Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program. As discussed Chapter 2, *Project Description*, the street trees will be manually watered 33 times annually. For the times when manual watering is not feasible, two 15-gallon water bags would be placed in the street tree well for the new street trees until the next scheduled manual watering. Other than routine watering and inspection, there are no additional operations associated with the Project. As a result of the proposed Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program, there would be an increase in the number of street trees from the baseline count of 711,248 to 728,793 and an approximate 0.72 percent net increase of the street tree canopy cover.

3.12.3.5 Thresholds of Significance

The following significance criteria are informed by Appendix G of the CEQA Guidelines and the City's 2006 *L.A. CEQA Thresholds Guide*, which provide guidance for determining significance of impacts associated with transportation/traffic resulting from the Project. While the Draft EIR was being prepared with prior guidance documents and methodology, on July 30, 2019, the City Council per CEQA Guidelines Section 15064.7 approved the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (LADOT Guidelines), which establishes guidelines for transportation assessment based on legislative and regulatory changes consistent with the VMT impact methodology, SB 743, and the revised 2018 CEQA Guidelines. (City of Los Angeles, 2019.)

The determination of whether a transportation/traffic impact would be significant is based on the professional judgment of the City as Lead Agency supported by the recommendations of qualified personnel at ICF and relies on the substantial evidence in the administrative record, and is consistent with LADOT Guidelines.

In general, under the LADOT Guidelines, a transportation assessment is not required for the Project since it is a Transportation Project that does not modify existing roadway vehicle capacity and therefore does not: (1) induce additional VMT by increasing vehicle capacity; or (2) reduce roadway through-lane capacity. Notwithstanding, based on the LADOT Guidelines, this Draft EIR still considers at least for informational purposes that impacts are significant if the Project would result in any of the following:

- **TR-1:** Would the proposed Project result in temporary traffic constraints due to construction? *City of Los Angeles.*

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

  - The length of time of temporary street closures or closures of two or more traffic lanes;
  - The classification of the street (major arterial, state highway) affected;

- The existing congestion levels on the affected street segments and intersections;
- Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;
- Potential safety issues involved with street or lane closures; and
- The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.

- **TR-2:** Would the proposed Project result in the temporary loss of access due to construction? *City of Los Angeles.*

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

  - The length of time of any loss of pedestrian or bicycle circulation past a construction area;
  - The length of time of any loss of vehicular, bicycle, or pedestrian access to a parcel fronting the construction area;
  - The length of time of any loss of ADA pedestrian access to a transit station, stop, or facility;
  - The availability of nearby vehicular or pedestrian access within ¼ mile of the lost access; and
  - The type of land uses affected, and related safety, convenience, and/or economic issues.

- **TR-3:** Would the proposed Project result in the temporary loss of bus stops or the rerouting of bus lines due to construction? *City of Los Angeles.*

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

  - The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
  - The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;
  - The existence of other bus stops or routes with similar routes/destinations within a ¼ mile radius of the affected stops or routes; and
  - Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).

- **TR-4:** Would the proposed Project conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)(2) by substantially inducing additional automobile travel due to operations? *City of Los Angeles.*
- **TR-5**: Would the proposed Project negatively affect residential streets due to operations? *City of Los Angeles.*

Thresholds in the LADOT Guidelines regarding whether a project that would: (1) conflict with a program, plan, ordinance, or policy addressing the circulation system; (2) substantially increase hazards due to a geometric design feature or incompatible uses; (3) negatively affect pedestrian, bicycle, or transit facilities; and (4) negatively affect access, safety, and circulation apply to

Development Projects defined as proposed land use development projects, and not Transportation Projects like the Project.

Notwithstanding, the Project: (1) would create a negligible impact on VMT and would not generate a net increase of 250 or more daily vehicle trips, as discussed below in Section 3.12.3.7; (2) would not be required to make any voluntary or required modification to the public right-of-way for vehicles; and (3) would not involve a lot 0.5 acres or more in total gross area or fronting along a street classified as an avenue/boulevard. Accordingly, the Project would not have required further assessment under the LADOT Guidelines under these thresholds for Development Projects.

3.12.3.6 Construction Impacts

TR-1. Would the proposed Project result in temporary traffic constraints due to construction?

This impact would be less than significant.

Under all construction scenarios, construction activity would typically involve restricting on-street parking adjacent to construction activity. In cases where on-street parking is prohibited, a single travel lane may be closed to allow construction access to the sidewalk. Full street closures may be required on small residential streets, but such closures are expected to be infrequent and would not exceed a few hours at a time. In all other cases, construction activity would not require closure of two or more travel lanes along any individual roadway segment.

Construction activity may occasionally require use of flagpersons within near construction sites. Street closures may occur for short periods, but would be limited to residential streets and would not extend into the peak period. Local access would be maintained and traffic control would implement best practices from the WATCH manual per PDF-TR-1 that serves as an industry standard for construction-related traffic control both within the work-site and on the nearby local street network.

Construction activity could occur along any roadway within the City with an existing sidewalk in disrepair and may involve temporary short-term lane closures associated with crosswalk repaving or travel lane restriping. Consistent with LAMC Section 62.61, temporary lane closures along major and secondary highways or collector streets would be limited to off-peak hours to the maximum extent feasible but would likely require applications for exemptions and permit fees if closures are required during AM or PM peak hours. Major or secondary highways or collectors correspond to Boulevards I, Boulevards II, Avenues I, Avenues II, Avenues III, and Collectors per the designations of the Mobility Plan 2035. Signage and traffic control operators would be used to redirect traffic to adjacent routes. Local vehicular, bicycle, and pedestrian access would be maintained throughout construction per PDF-TR-3 through PDF-TR-5.

In addition, substantial utility work may result in temporary disruption to the traffic signal operations. Any work involving signal disruption would be coordinated with LADOT and the Los Angeles Police Department (LAPD) to identify and implement temporary traffic control needs per the 2012 “Greenbook” Standard Specification for Public Works Construction Section 307-5 et seq., Temporary Street Lighting and Traffic Signal Systems. Worksite Traffic Control Plans (TCPs) would be developed as needed for substantial utility work or temporary road closures to ensure that any construction-related impacts are minimized to the greatest extent possible, per “Greenbook” Section 7-10.2.

Some local streets have weight limitations or restrictions that limit truck traffic. Typically, trucks would not travel on these streets except to obtain access to a specific site. The City's policy is to allow trucks to travel in a "reasonable fashion" to and from a work site. Truck trips would comply with this policy, including coordination to arrive and depart at off-peak commute times to the extent feasible per PDF-TR-8.

Existing traffic levels and intersection and segment LOS vary across the City. Areas of substantial traffic congestion would be anticipated to experience the effects of increased traffic from daily construction trips to a greater degree than in areas with relatively low levels of congestion, such as residential streets. Construction trip generation is expected to be widely distributed across the City and the effects would be localized. However, worker commute trips could occur during PM peak hours and are expected to vary, but could be up to 18 trips per day (half of total worker commute trips) for each site under Construction Scenario 1 and up to 23 trips per day (half of total worker commute trips) for each site under Construction Scenario 2, depending on the level of construction activity. Up to 13 truck trips under Construction Scenario 1 and up to 15 truck trips under Construction Scenario 2 to/from the site could occur during the AM peak hours, with some trips staggered throughout the day as work occurs. To the extent feasible, truck trips would be coordinated to arrive and depart outside of peak commute times per PDF-TR-8.

As described above, the maximum estimated daily construction trip generation at any single repair site would be 76 daily trips, with up to approximately half of that total expected during peak hours. For lane closures that would be required during the AM peak hours between 7:00 and 9:00 AM, site-specific applications for exemption from LAMC Section 62.61 and payment of a permit fee would be required and have been included as a project design feature. For lane closures along streets that directly lead to a freeway on- or off-ramp, special accommodations along roadways that lead directly to a freeway would be considered on a case-by-case basis and may involve consultation with the California Department of Transportation. All construction-related traffic control that would occur near freeway on- or off-ramp or other state highways would comply with the guidelines in the WATCH manual to ensure effective traffic control and safety.

In addition, substantial utility work may result in temporary disruption to the traffic signal operations. Any work involving signal disruption would be coordinated with LADOT and LAPD to identify and implement temporary traffic control needs per PDF-TR-9. TCPs would be developed as needed for substantial utility work or temporary road closures to ensure that any construction-related impacts are minimized to the greatest extent possible.

The Project would involve construction vehicles and equipment near traveled roadways, which has the potential to result in safety issues. Potential safety hazards due to the maneuvering of construction-related vehicles and equipment near travel lanes would be minimized through the clear demarcation of work zones and use of flagpersons in cases where equipment or construction vehicles would need to occupy the roadway for short periods of time, per the WATCH manual and PDF-TR-1. Consequently, impacts related to safety from street or lane closures would be minor.

Construction could occur near emergency service facilities (e.g., fire stations and hospital) and along roadways used by emergency service providers. Though adequate emergency access would be maintained during lane closures along major and secondary highways and collectors, compliance with the WATCH manual guidelines and PDF-TR-1 would further ensure a less-than-significant impact. Construction would have a minimal impact on access to nearby emergency services because

coordination with nearby emergency service providers would ensure construction activity would not significantly disrupt emergency service access.

As discussed above, construction activities would involve lane closures and parking restrictions and would generate worker commute trips, as well as construction material hauling trips, some of which would occur during peak traffic hours and affect roadway operations near Project sites. Construction activities would be geographically widely distributed throughout the City, and the project would generate a relatively low number of trips at any individual construction site. Therefore, temporary traffic impacts would not be substantial during construction, which may last up to 30 days at any construction site. Furthermore, the effects of lane closures and parking restrictions would be minimized through compliance with LAMC Section 62.61 and the WATCH manual, as well as through the use of flagpersons. Consequently, the Project's in-street construction impacts related to temporary traffic constraints would be less than significant.

Mitigation Measures

No mitigation measures are required.

TR-2. Would the proposed Project result in the temporary loss of access due to construction?

This impact would be less than significant.

A construction activity could result in temporary parking restrictions and/or lane closures around each Project site for up to approximately 30 work days. Vehicular access would be restricted when repairs occur at driveways. In instances where vehicle access is restricted, advanced notice would be provided to relevant property owners per PDF-TR-3. Alternative access and parking would be identified in coordination with the property owner as needed.

In addition, construction activity may involve temporary curb lane closures associated with substantial utility work and/or crosswalk repaving. Lane closures along major and secondary highways or collectors streets would occur during off-peak periods in consultation with LADOT. Signage and flagpersons would be used to redirect traffic. To the extent feasible, local vehicular, bicycle, and pedestrian access would be maintained throughout construction.

Construction activity would likely result in a temporary disruption of pedestrian access along the portion of sidewalk being repaired. Pedestrian access to adjacent properties would be accommodated during construction. Temporary access in compliance with applicable accessibility requirements to adjacent land uses would be provided as requested and signage would be used, as needed, to direct pedestrians to alternative pedestrian routes, per PDF-TR-4.

As identified above, construction activities would result in a temporary loss of access related to driveway obstructions, temporary loss of parking spaces, and disruptions to pedestrian travel. However, due to the short-term duration of these losses in access and that the Project team would coordinate its activities with affected property owners and occupants, impacts related to potential temporary loss of access would be less than significant.

Mitigation Measures

No mitigation measures are required.

TR-3. Would the proposed Project result in the temporary loss of bus stops or the rerouting of bus lines due to construction?

This impact would be less than significant.

Construction activity could result in temporary impacts on bus stops for up to approximately 30 work days for a construction site. In addition, construction activity may involve temporary curb lane closures associated with substantial utility work and/or crosswalk repaving. Per PDF-TR-6, to the maximum extent feasible, the lane closures would occur during off-peak periods in consultation with LADOT. For those lane closures that would occur during peak travel times, an exemption and permit in compliance with LAMC Section 62.61 would be required. At construction locations with temporary lane closures along existing bus routes, the Project team would coordinate with the relevant transit providers to establish temporary route detours.

Due to the likelihood of construction activities coinciding with bus stops, it is likely that temporary impacts on bus stops would occur. These impacts would be limited to the maximum 30-day construction period and would be coordinated with the appropriate transit providers to ensure that effects on bus riders would be minimized per PDF-TR-6. Consequently, impacts related to temporary loss of bus stops or rerouting of bus lines would be less than significant.

Mitigation Measures

No mitigation measures are required.

3.12.3.7 Operational Impacts

The continuation of operational activities from the Project would include sidewalk inspection and watering street trees with a hose that is attached to a water tank on a pick-up truck. During construction activities, street trees would have been planted in a 4- by 6-foot street tree well, per the proposed Revised Street Tree Retention, Removal and Replacement Policy for Sidewalk Repair Program. Routine water consists of manually watering the street trees approximately 33 times a year, as discussed in Chapter 2, *Project Description*. For the times when manual watering is not feasible, two 15-gallon water bags would be left in the street tree well for the new street trees until the next scheduled manual watering. Other than inspection and routine watering, there are no additional operational activities associated with the Project. As a result of the proposed Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program, continuation of construction activities of the Project would increase the number of street trees from the baseline count of 711,248 to 728,793 and the continuation of operational activities would provide for an approximately 0.72 percent net increase in street tree canopy.

The continuing operational activities from the Project would involve the generation of VMT associated with street tree establishment period and regular maintenance and inspection activities. However, given the negligible changes in VMT that would result from the operational activities from the Project and that the LADOT Guidelines specify that transportation projects that are not likely to lead to a substantial or measurable increase in vehicle travel are not required to prepare an induced travel analysis, no quantitative VMT analysis is required for the Project. Because the Project fits the definition of rehabilitation, maintenance, replacement, safety, and repair projects and would not add motor vehicle capacity, the Project would have a less-than-significant impact related to operational VMT generation.

TR-4. Would the proposed Project conflict or be inconsistent with CEQA Guidelines Section 15064.3 (b)(2) by substantially inducing additional automobile travel due to operations?

The impact would be less than significant.

Per the LADOT Guidelines, the Project would not require any further assessment for inconsistency with VMT because the Project involves the rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets and do not add additional motor vehicle capacity and hence is not likely to lead to substantial or measurable increase in vehicle travel.

Mitigation Measures

No mitigation measures are required.

TR-5. Would the proposed Project negatively affect residential streets due to operations?

The impact would be less than significant.

Per the LADOT Guidelines, the Project would not require any further assessment for residential streets because the operational activities from the Project would not generate a net increase of 250 or more daily vehicle trips. It does not reduce vehicle travel lane capacity.

Mitigation Measures

No mitigation measures are required.

3.12.4 Significant Unavoidable Adverse Impacts

No significant and unavoidable adverse impact related to transportation would occurs.