

## 3.10 Transportation/Traffic

This section describes the regulatory setting, existing transportation/traffic conditions at the Project Site and associated study area (see below) and the potential impacts that would result from implementation of the Proposed Project. It also identifies, where necessary, mitigation measures to reduce identified significant impacts. As noted in the analysis below, with the implementation of mitigation measures, direct and indirect impacts associated with transportation/traffic conditions during construction and operation of the Proposed Project would be less than significant.

### 3.10.1 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 Proposed Project.

#### 3.10.1.1 Federal

There are no federal regulations or policies regarding transportation and traffic that are applicable to the Proposed Project.

#### 3.10.1.2 State

There are no state regulations or policies regarding transportation and traffic that are applicable to the Proposed Project.

#### 3.10.1.3 Local and Regional

##### **Southern California Area 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 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 —ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges that are included in the 2016 RTP/SCS. These future investments seek to reduce traffic bottlenecks, improve the efficiency of the region's network and expand mobility choices for everyone.

### **County of Los Angeles Congestion Management Program**

The Los Angeles Congestion Management Program (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, with minimum levels of service (LOS)<sup>1</sup> performance measurements designated at LOS E (unless exceeded in base year conditions) 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 intersections during the peak hour or 150 trips to mainline freeway locations. The analysis must: investigate measures that will mitigate the significant CMP system impacts; develop cost estimates, including the fair share costs to mitigate impacts of the Proposed Project; and, indicate the responsible agency. Selection of final mitigation measures is left at the discretion of the local jurisdiction. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

### **City of Los Angeles Mobility Plan 2035**

In August 2015, the City of Los Angeles (City) updated the Transportation Element of the City's General Plan, now referred to as Mobility Plan 2035, or MP 2035, to reflect policies and programs that will lay the policy foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the city of Los Angeles. The MP 2035 and Final EIR were adopted on August 11, 2015 and are compliant with the 2008 Complete Streets Act, which mandates that the circulation element of a city's General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, person with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

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<sup>1</sup> LOS is a qualitative measure that is used to describe the condition of traffic flow, ranging from excellent conditions (LOS A) to overloaded conditions (LOS F). The City of Los Angeles uses LOS D as a standard, meaning LOS D or better is considered satisfactory conditions, while LOS E or F is generally considered to be substandard.

## City of Los Angeles 1999 General Plan Transportation Element

At the time of this Draft EIR, the Mobility Plan 2035 is subject to legal challenge. In the event the litigation results in the Mobility Plan 2035 being stayed or overturned, the 1999 Transportation Element will be the effective circulation element for the City's General Plan. Therefore, in an excess of caution, the City has included a brief discussion of the Transportation Element.

The Transportation Element includes a discussion of the existing roadway infrastructure in the city of Los Angeles. Goals, objectives, and policies are included in the transportation element to ensure efficient circulation within the city and region.

### Coastal Transportation Corridor Specific Plan

The Coastal Transportation Corridor Specific Plan Area consists of all or parts of the Westchester-Playa Del Rey Community Plan Area, the Palms-Mar Vista-Del Rey Community Plan Area, the Venice Community Plan Area, and the Los Angeles International Airport Interim Plan Area, generally bounded by the city of Santa Monica on the north, Imperial Highway on the south, San Diego Freeway on the east, and the Pacific Ocean on the west and has the following purposes:

- Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new commercial and industrial development within the corridor;
- Establish the Coastal Transportation Corridor Impact Assessment Fee process for new development in the C, M, and P Zones and for development on property owned by the Department of Airports;
- Regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses;
- Establish a Coastal Transportation Corridor infrastructure implementation process;
- Promote or increase work-related ridesharing and bicycling to reduce peak-hour trips and to keep critical intersections from severe overload;
- Avoid peak-hour LOS on streets and interchanges from reaching LOS F or, if presently at LOS F, preclude further deterioration in the LOS;
- Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
- Reduce commute trips by encouraging the development of affordable housing at or near job sites;
- Ensure that the public transportation facilities that will be constructed with funds generated by the Specific Plan will significantly benefit the contributor; and
- Encourage Caltrans to widen the San Diego Freeway for high-occupancy vehicle lanes.

### Venice Local Coastal Program

The Venice Local Coastal program (LCP) was prepared to comply with the California Coastal Act of 1976. The Coastal Act directs each local government lying wholly or partly within the Coastal Zone to prepare an LCP for those areas located in the state's designated Coastal Zone. The Venice Coastal Zone is the area generally bounded by Marine Street on the north, the city-county boundary, Washington Boulevard and Via Marina on the south, Lincoln Boulevard and Via Dolce on the east, and the Pacific Ocean on the west.

## Venice Specific Plan

The purpose of the Venice Specific Plan is to implement the policies and goals of the California Coastal Act and regulate all development, including parking in order that it be compatible in character with the existing community. Section 13 of the Venice Specific Plan specifically addresses parking standards and requirements as well as Beach Impact Zone parking requirements for new development within the Venice Coastal Zone.

## Venice Local Coastal Program Land Use Plan

The purpose of the Venice LCP-LUP is to define goals and land use policies for compliance with the California Coastal Act. It is intended to restore the overall quality of the Venice Coastal Zone environment and its natural and man-made resources and assures that public coastal access and public recreation areas are provided as required per the Coastal Act.

The following CA Coastal Act policies are included as part of the Venice LCP LUP:

### Article 2. Public Access

30212. "(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway."

### Article 6. Development

30252. "The location and amount of new development should maintain and enhance public access to the coast by.....providing non-automobile circulation within the development and provide adequate parking facilities or providing substitute means of serving the development with public transportation."

Venice LCP LUP Policy Group II, *Shoreline Access Policy II. A. 3. Parking Requirements*, outlines parking requirements that shall apply to all new development. Extensive remodeling of an existing use or change of use that does not conform to the parking requirements shall be required to provide missing numbers of parking spaces or provide an in-lieu fee payment into the Venice Coastal Parking Impact Trust Fund for the existing deficiency. Public Utility Facility not having a Business Office on the premises requires 2 spaces; plus 1 space for each 500 square feet of floor area. Parking shall be provided pursuant to a detailed parking study that demonstrates that the project will provide adequate parking to meet the needs of the development without causing negative impacts to coastal access or access to public recreational facilities. (City of Los Angeles 2001).

*Policy Group II Shoreline Access* as it pertains to parking is considered a Venice Coastal Issue consistent with the California Coastal Act and has been identified in the Venice LCP LUP as the following:

The following parking issues have been identified as part of the Venice LCP LUP:

- Conflict between residential and beach visitor parking.
- Inadequate signage of available parking for beach visitors on weekends resulting in added traffic congestion.
- Inadequate parking provided by non-conforming uses.

- Inadequate off-street parking near or on the beach frontage for visitors and residents.
- Intrusion of non-resident vehicles on residential streets to locate available parking spaces.
- Preventing polluted stormwater runoff from parking lots from entering the Venice Canals and Ballona Lagoon.

## 3.10.2 Environmental Setting

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 Proposed Project's impacts and identify required mitigation measures.

### 3.10.2.1 Existing Street System

Primary regional access to the Project Site is provided by the Marina Freeway (SR 90), the San Diego Freeway (I-405), and the Santa Monica Freeway (I-10). SR 90 runs east of the Project Site along a diagonal east of Marina Del Rey. Access to the Project Site from SR 90 can be obtained from Lincoln Boulevard (SR 1). I-10 runs in an east/west direction north of the study area and I-105 runs east/west south of the study area. Both I-10 and I-105 connect with I-405 to the north and south, respectively. Washington Boulevard, located approximately 0.3 mile north of the Project Site, serves as the nearest and primary commercial corridor. The Project Site is located at the northeast corner of Hurricane Street and Canal Court, across from and immediately north of the existing VPP. Figure 2-2, Project Location Map (see Chapter 2, Project Description of this EIR) shows the project location along with local existing pedestrian and vehicular access.

The main streets carrying project-related construction traffic (both worker trips and truck trips) to the construction site would be: Lincoln Boulevard, Washington Boulevard, Venice Boulevard (SR 187), Pacific Avenue, Hurricane Street, Canal Court, and Galleon Street. These boulevards, avenues, and local streets in the project's study area offer sub-regional and local access and circulation opportunities. These facilities generally provide two to four travel lanes and allow parking on one side of the street. However, both Hurricane Street and Canal Court are narrow roadways that do not allow two vehicles to pass at the same time. This condition creates the need for drivers to wait to pass one another.

Below is a brief description of the major streets serving the Proposed Project Site. Sidewalks are generally available in the vicinity of the project area, except along Canal Court.

- Canal Court – Canal Court is a short undivided alleyway that runs between Driftwood Street to the north and the Ballona Lagoon to the south. Parking is not permitted along Canal Court.
- Galleon Street – Galleon Street is a short undivided local street that runs east/west between Pacific Avenue and Esplanade, just west of the Venice Canal/Ballona Lagoon. Parking is permitted on both sides of the street, though some restrictions are present along several properties.
- Hurricane Street – Hurricane Street is a short undivided local street that runs east/west between Ocean Front Walk and Esplanade, just west of the Venice Canal/Ballona Lagoon. The street terminates adjacent to the Project Site and parking is permitted on both sides of the street.

- Lincoln Boulevard (SR 1) – SR 1 is an arterial street that runs north/south in the study area and it generally provides four travel lanes. Metered parking is available on both sides of the street and the speed limit is 35 miles per hour (MPH).
- Marquesas Way – Marquesas Way is a short four-lane secondary street that runs east/west and connects Via Dolce and Via Marina. Parking is permitted on the east side of the street and the speed limit is 25 MPH.
- Pacific Avenue – Pacific Avenue is a two-lane secondary arterial that runs north/south between Barnard Way to the north and Via Marina to the south. Between Washington Boulevard and Hurricane Street, parking is restricted along the east side of the street but it is unrestricted on the north side. The posted speed limit within this segment is 30 MPH.
- Via Marina – Via Marina is a four-lane street that runs north/south between Washington Boulevard and Pacific Avenue. No parking is allowed on either side of the street and the speed limit is 40 MPH.
- Via Dolce – Via Dolce is a secondary arterial that runs north/south between Washington Boulevard and Marquesas Way. It includes two northbound lanes and one southbound lane, plus bicycle lanes. Parking is allowed on both sides of the street and the speed limit is 35 MPH.
- Washington Boulevard – Washington Boulevard is a Major Highway Class II arterial street that runs east/west between Venice Beach and the City of Whittier. It generally provides four travel lanes plus bicycle lanes. Metered parking is generally available on both sides of the street. The speed limit is 35 MPH.

### 3.10.2.2 Existing Traffic Congestion and Levels of Service

As part of the Venice Dual Force Main (VDFM) Draft EIR prepared in 2006, the City conducted a detailed assessment of the existing operating conditions at 23 roadway segments and nine intersections in the vicinity of the Project Site's directly adjacent Venice Pumping Plant. In response to comments received on the Draft EIR and minor changes in the project description, the traffic study was updated in June 2009. The data collected and projected as part of that study is adequate to reflect existing conditions today since the area has not experienced significant change or new development that would have significantly added or reduced traffic patterns in the vicinity of the project area.

Of the roadway segments studied that are now within the project vicinity, the roadway segments were projected to operate at LOS D or better during morning and afternoon peak hours in the future (2011). Of the intersections studied that are now within the current project study area, three intersections would also serve the Project Site. The VDFM Traffic Study projected the intersection volume to capacity (V/C) ratio and corresponding LOS, as shown in Table 3.10-1 below.

As shown in Table 3.10-1, four of the six study intersections were projected to operate at LOS D or better during all analyzed peak hours. The intersection of Via Marina & Washington Boulevard was projected to operate at LOS E in the PM peak hour and LOS F in the Sunday midday peak hour. The intersection of Lincoln Boulevard & Washington Boulevard was projected to operate at LOS F during all three peak hours.

**Table 3.10-1. Year 2011 Intersection Level of Service**

Intersection	Peak Hour	VC or Delay	LOS
Pacific Avenue & Washington Boulevard	AM	0.657	B
	PM	0.797	C
	Weekend	0.512	A
Via Marina & Washington Boulevard	AM	0.863	D
	PM	0.934	E
	Weekend	1.029	F
Lincoln Boulevard & Washington Boulevard	AM	1.088	F
	PM	1.120	F
	Weekend	1.190	F
Via Marina & Marquesas Way	AM	0.325	A
	PM	0.253	A
	Weekend	0.331	A
Via Marina & Tahiti Way	AM	0.321	A
	PM	0.208	A
	Weekend	0.287	A
Via Marina & Bora Bora Way	AM	2.8	A
	PM	2.5	A
	Weekend	2.0	A
	worst approach only AM	11.7	B
	worst approach only PM	11.1	B
	worst approach only Weekend	12.0	B
	If signalized AM	0.438	A
	If signalized PM	0.372	A
	If signalized Weekend	0.450	A

Notes:

AM Peak Hours = 7:00 am – 9:00 am

PM Peak Hours = 4:00 pm – 6:00 pm

2011 Intersection LOS is based on the Year 2011 cumulative base (without project) conditions contained in the VDFM Traffic Study prepared by Fehr & Peers, 2009.

Source: Fehr & Peers, 2009.

### 3.10.2.3 Existing CMP Facilities

The CMP arterial monitoring intersection nearest to the Project Site is located at Lincoln Boulevard (SR 1) and SR 90 (Marina Expressway), which is approximately 1.2 miles to the northeast. Additionally, two additional arterial monitoring locations are located at the intersection of Lincoln Boulevard and Venice Boulevard (SR 187) approximately 1.3 miles to the northwest of the Project Site. West of this intersection, SR 187 is considered Other Principal Arterial. No other immediate streets surrounding the Project Site and vicinity are considered CMP facilities. The 2010 CMP showed these intersections to be operating at LOS D or better during both AM and PM peak hour.

### **3.10.2.4 Existing Parking**

Parking within the community is predominantly unrestricted, publicly available, and on street. A City-owned off-street parking lot is located on the northwestern edge of the study area, at the terminus of Washington Boulevard, which includes a total of 364 parking spaces (329 regular, 26 extended spaces for recreational vehicles, and 9 spaces designated for disabled parking). Hurricane Street, where the Project Site is located, also contains restricted (street sweeping) on-street parking. The local street sweeping schedule varies by street but parking is generally restricted on Mondays or Tuesdays from 10:00 AM to 12:00 PM. Parking is prohibited on Canal Court.

### **3.10.2.5 Existing Transit System**

Transit service within the study area is provided as follows:

- Metro Lines 108 and 358 operate on Pacific Avenue between Via Marina and Washington Boulevard and along Washington Boulevard between Pacific Avenue and Palawan Way. The lines run between Marina del Rey and Pico Rivera, with Line 358 providing limited stop service during the peak periods.
- Culver City Blue Bus Line 1 provides service on Washington Boulevard between Venice and the West Los Angeles Transit Center.
- Commuter Express Line 437 is operated by LAODT and runs on Via Dolce and Pacific Avenue in the project area. This line runs between Marina del Rey and downtown Los Angeles.

### **3.10.2.6 Non-Motorized Transportation**

Biking and walking are non-motorized transportation modes that typically serve shorter trips than do motorized travel modes. In the project area, bikeways facilitate and encourage this mode of non-motorized transportation. According to LADOT, Class I bikeways are separate off-street paths, Class II bikeways are striped lanes within streets, and Class III bikeways are signed bicycle routes. The nearest dedicated bicycle lane is located along Washington Boulevard north of the Project Site and Via Dolce east of the Project Site. Pedestrian access at and near public transit, in local commercial and residential areas is facilitated by sidewalks, which are present on most streets, except Canal Court. Esplanade provides walking paths along the Grand Canal and Ballona Lagoon areas.

## **3.10.3 Environmental Impact Analysis**

### **3.10.3.1 Methodology and Assumptions**

This section describes the procedures used to assess impacts on the traffic and transportation system. Assumptions regarding the types of transport and the types of roads used to haul materials and workers were used to estimate the number of trips to be generated by the Proposed Project and assess the overall significance of project impacts. For purposes of assessing the project's traffic impact upon adjacent roadways, the project's net additional construction and operation traffic trip generation was qualitatively compared against existing traffic conditions. In determining the level of significance, the assessment assumed that the implementation of the Proposed Project would comply with relevant regulations, ordinances, and guidance.



The traffic projections for the Proposed Project were developed using three steps: estimating the trip generation of the project, determining trip distribution, and assigning the project traffic to the roadway system. The information used in this analysis was provided by the Los Angeles Bureau of Engineering (LABOE) and the project team. Construction of the project is planned to begin in March 2018 and is expected to take approximately 24 months to complete, ending in 2020. The construction involves several key phases, which may overlap, as described below.

1. Stages 1-2: Mobilization, Site Preparation, and Excavation – three to four months (155 days), including approximately two to three months of soil hauling;
2. Stage 3: Pump Station Foundation/Electrical – nine to 10 months;
3. Stage 4: Diversion Structure – four to six months; and
4. Stages 5-6: Pump Station Integration/Finishing – two to four months.

The Los Angeles Municipal Code (LAMC) provides that construction activities are limited 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 holidays. No construction is permitted on Sundays. VAPP construction hours are proposed to be Monday through Saturday from 8:00 a.m. to 6:00 p.m. (See MM NOI-1). While other construction-related traffic could occur anytime within the allowable hours, soil hauling truck hours would occur between 9:00 a.m. and 4:00 p.m. Monday through Saturday. It is planned that construction workers would park at an off-site location and be shuttled to and from the Project Site each workday by passenger shuttles or vans (that have the capacity to seat 10 to 15 passengers). While no specific off-site location has been identified at this time, it would likely lie within five miles of the Project Site. The selected contractor would be required to identify and secure a suitable location. In general, work is planned to occur between 8:00 a.m. and 6:00 p.m., and worker shuttles are expected to depart the site by 6:00 p.m. On days when soil export is occurring, workers would all be onsite before soil trucks begin to arrive and would remain on-site until after the last soil export truck departs. Appendix J (Trip Generation Analysis, October 3, 2016) of this EIR presents the estimated vehicle trip generation at the Project Site during the analyzed peak hours and on a typical weekday.

In addition to soil haul trucks, the project would generate equipment and delivery truck trips during each phase of construction. Such trips are estimated to be two per day (four passenger car equivalents [PCE] trips per day) and could include cranes, bulldozers, excavators, and other large items of machinery. These materials would be delivered to the site and stored on-site at one of two laydown areas (see Chapter 2, Project Description).

The number of construction workers would vary throughout the construction period. During Stages 1 and 2 and Stage 4, approximately eight workers would be on-site each day. Stage 3 would require up to 20 workers on-site daily. Stages 5 and 6 would require approximately six workers per day. Table 3.10-2 summarizes the daily trip generation by construction stage.

**Table 3.10-2. Daily Trip Generation by Construction Phase**

Stage	Stage Name	Duration (days)	Daily Workers by Phase	Worker Trips at Site per day*	Soil Haul Truck Trips per Day**	Other Truck Trips per Day	Total Daily 1-way Vehicle Trips	Total Daily 1-way PCE Trips
1-2	Mobilization/ Site Preparation/ Excavation/ Shoring	30	3	4		2	6	8
		95	8	4	48	2	54	104
3	Pump Station Foundation Pump Station	50	20	8		2	10	12
		245	20	8	48	2	58	108
4	Diversion Structure	64	8	4	0	2	6	8
5-6	Pump Station Integration	85	6	4	0	2	6	8

Notes:

PCE – passenger car equivalency

\*Assumes that employees will be shuttled to/from the Project Site after parking off-site. Capacity of shuttle is assumed to be 15 passengers or less.

\*\* 10,000 cubic yards of soil will be excavated and exported during Stages 1 and 2, of which approximately 2,300 cubic yards would be stockpiled at Laydown Area 1 and approximately 7,700 cubic yards of soil would be stockpiled at Laydown Area 3. If needed, up to 3,850 cubic yards will be imported (returned) back to the VAPP site use as backfill during Stage 3 and 4. The balance of the exported soil is expected to be used as cover at an area landfill, such as Sunshine Canyon.

Source: City of Los Angeles, Fehr & Peers, 2016.

### 3.10.3.2 Screening Analysis

The *L.A. CEQA Thresholds Guide* (2006) includes two sets of criteria to evaluate project impacts: screening and significance criteria. The screening criteria assist in deciding when further study is needed to determine whether a project impact could be significant. For many issue areas, further study is recommended when one or more questions are answered with a "yes." A "no" response to all questions indicates that further study is not required, and there would normally be no significant impact from the Proposed Project on the subject issue.

The *L.A. CEQA Thresholds Guide* (2006) includes the screening criteria outlined below for Transportation and Traffic (L.1 through L.8) to determine if additional study is necessary. Table 3.10-3 below summarizes whether the project impacts would require further study based on the screening criteria.

**Table 3.10-3. Summary of Screening Analysis**

Screening Criteria	Requires Further Study? Yes/No
<b>L.1. Intersection Capacity, L.2. Street Segment Capacity</b>	
Would the Proposed Project generate and/or cause a diversion or shift of 500 or more daily trips or 43 or more PM peak-hour vehicle trips on the street system?	No
<b>L.3. Freeway Capacity</b>	
Would the Proposed Project add 150 or more one-way vehicle trips to a Congestion Management Program (CMP) mainline freeway monitoring segment during either the AM or PM peak hours?	No
Would the Proposed Project add 50 or more AM or PM peak-hour trips to a freeway on- or off-ramp?	No
<b>L.4. Neighborhood Intrusion Impacts</b>	
Would the Proposed Project generate more than 120 daily vehicle trips to a local residential street?	No
<b>L.5. Project Access</b>	
Would the Proposed Project generate and/or cause a diversion or shift of 500 or more daily trips or 43 or more PM peak-hour vehicle trips on the street system?	No
Is a project driveway proposed on a major or secondary highway within 150 feet of an intersection with another major or secondary highway?	No
Would a project driveway intersect an on-street bicycle lane or cross a sidewalk in an area of high pedestrian activity?	No
Can it be readily perceived that there are access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls, or other barriers to adequate lines of sight?	No
<b>L.6. Transit System Capacity</b>	
Will an Environmental Impact Report (EIR) be prepared for the Proposed Project to evaluate potential transportation impacts??	
<b>L.7. Parking</b>	
Would the project's proposed parking supply be less than that required by City code, including Los Angeles Municipal Code (LAMC), Transportation Specific Plan (TSP) or Interim Control Ordinance (ICO) requirements, prior to applying for a variance, exemption, or amendment, if any apply to the project?	No
If the project is located within the coastal zone (generally, 1,000 yards inland of the mean high tide line), would the project's proposed parking supply be less than that required by California Coastal Commission requirements?	No
<b>L.8. In-Street Construction Impacts</b>	
Would a project not exempted in Article VII of the City CEQA Guidelines require construction activities to take place within a major or secondary highway ROW that would necessitate temporary lane, alley, or street closures for more than one day (including day and evening hours, and including overnight closures if on a residential street)?	No
Would a non-exempt project require construction activities to take place within a collector or local street ROW that would necessitate temporary lane, alley, or street closures for more than seven days (including day and evening hours, and including overnight closures if on a residential street)?	Yes

Screening Criteria	Requires Further Study? Yes/No
Would in-street construction activities result in the loss of regular vehicular or pedestrian access to an existing land use for more than one day, including day and evening hours and overnight closures if access is lost to residential units?	No
Would in-street construction activities result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the Project Site?	No

Source: *L.A. CEQA Thresholds Guide*, 2006; Fehr & Peers, 2016.

### L.1. Intersection Capacity, L.2. Street Segment Capacity

- **Would the Proposed Project generate and/or cause a diversion or shift of 500 or more daily trips or 43 or more PM peak-hour<sup>2</sup> vehicle trips on the street system?**

According to the *L.A. CEQA Thresholds Guide* (2006), a "no" response to the preceding question indicates that there would normally be no significant Intersection Capacity and Street Segment Capacity impacts from the Proposed Project. Trip generation estimates that were prepared for the project were based upon projected staffing and truck activity levels. Trip generation estimates represent a worst-case scenario in that they consider the upper bounds of impacts likely to be experienced on the street system in the immediate vicinity of the Project Site where construction activities could result in temporary lane closures and loss of on-street parking.

The number of vehicle trips generated by the project are expected to be up to a total of 58 daily one-way vehicle trips as the worst-case scenario (up to 48 soil haul, 8 construction worker, and 2 other trips). Considering the passenger car equivalency (PCE) factor of 2.0 for the truck trips, this stage of construction would result in up to 108 daily PCE trips.

However, the number of construction workers and construction equipment would actually vary throughout the construction day in order to maintain a reasonable schedule of completion. Construction workers are anticipated to be onsite before 8:00 a.m. and would typically leave the Project Site before 6:00 p.m. While they would be commuting during morning and afternoon peak hours, the number of these trips would be negligible. As soil haul trucks will be restricted to the hours of 9:00 a.m. to 4:00 p.m. (see MM NOI-1), they will avoid morning peak (7:00 a.m. – 9:00 a.m.) and afternoon peak (4:00 p.m. – 6:00 p.m.) commute hours.

Construction truck traffic would arrive and depart during allowed construction hours (8:00 a.m. – 6:00 p.m.) (See MM NOI-1), deliveries would be staggered throughout the day as work occurs, and to the extent feasible, coordinated to arrive and depart at off-peak commute times.

Once VAPP becomes operational, two VAPP operations employees are expected to be at the site at any given time, and there would be three shifts per day. As such, the site is estimated to generate twelve 1-way trips per day.

As a result, the Proposed Project would not generate and/or cause a diversion or shift of 500 or more daily trips or 43 or more PM peak-hour vehicle trips on the street system. As such, no significant impacts to Intersection Capacity and Street Segment Capacity would occur and no further analysis is required.

<sup>2</sup> PM Peak hour is typically between 4:00 pm and 6:00 pm.

### L.3. Freeway Capacity

- **Would the Proposed Project add 150 or more one-way vehicle trips to a Congestion Management Program (CMP) mainline freeway monitoring segment during either the AM or PM peak hours?**
- **Would the Proposed Project add 50 or more AM or PM peak-hour trips to a freeway on- or off-ramp?**

According to the *L.A. CEQA Thresholds Guide (2006)*, a "no" response to all of the preceding questions indicates that there would normally be no significant impact on Freeway Capacity from the Proposed Project. As previously stated, the number of trips generated by the project would be up to a total of 58 daily one-way vehicle trips as the worst-case scenario (up to 48 soil haul, 8 construction worker, and 2 other trips), but the trips would be distributed throughout the day and not all 58 vehicle trips would occur during the AM or PM peak hours. Once VAPP becomes operational, the site is estimated to generate twelve 1-way trips per day. Two staff members are expected to be at the site at any given time, and there would be three shifts per day. As a result, the Proposed Project would not add 150 or more one-way vehicle trips to a Congestion Management Program (CMP) mainline freeway monitoring segment during either the AM or PM peak hour and would not add 50 or more AM or PM peak-hour trips to a freeway on- or off-ramp. As such, no significant impacts to Freeway Capacity would occur and no further analysis is required.

### L.4. Neighborhood Intrusion Impacts

- **Would the Proposed Project generate more than 120 daily vehicle trips to a local residential street?**

According to the *L.A. CEQA Thresholds Guide (2006)*, a "no" response to the preceding question indicates that there would normally be no significant impact on Neighborhood Intrusion from the Proposed Project. As previously stated, the number of trips generated by the project would be up to a total of 58 daily trips as the worst-case scenario. Once VAPP becomes operational, the site is estimated to generate twelve 1-way trips per day. Two VAPP operations employees are expected to be at the site at any given time, and there would be three shifts per day. As a result, the Proposed Project would not generate more than 120 daily vehicle trips to a local residential street. As such, no significant neighborhood intrusion impacts would occur and no further analysis is required.

### L.5. Project Access

- **Would the Proposed Project generate and/or cause a diversion or shift of 500 or more daily trips or 43 or more PM peak-hour vehicle trips on the street system?**
- **Is a project driveway proposed on a major or secondary highway within 150 feet of an intersection with another major or secondary highway?**
- **Would a project driveway intersect an on-street bicycle lane or cross a sidewalk in an area of high pedestrian activity?**
- **Can it be readily perceived that there are access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls or other barriers to adequate lines of sight?**

According to the *L.A. CEQA Thresholds Guide* (2006), a "no" response to the response to the first question and all of the following questions indicates that there would normally be no significant project access impacts from the Proposed Project. As previously stated, the number of trips generated by the project would be up to a total of 58 daily one-way vehicle trips as the worst-case scenario (up to 48 soil haul, 8 worker, and 2 other trips), but the trips would be distributed throughout the day and not all 58 vehicle trips would occur during the AM or PM peak hours. Therefore, it is assumed that the construction worker traffic would be before the morning and afternoon peak commute hours. Once VAPP becomes operational, the site is estimated to generate twelve 12-one-way trips per day. Two VAPP operations employees are expected to be at the site at any given time, and there would be three shifts per day. As a result, the Proposed Project would not generate and/or cause a diversion or shift of 500 or more daily trips or 43 or more PM peak-hour vehicle trips on the street system. In addition, the project driveway is not proposed on a major or secondary highway within 150 feet of an intersection with another major or secondary highway. Further, the project driveway does not intersect an on-street bicycle lane or cross a sidewalk in an area of high pedestrian activity. Lastly, there are no access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls, or other barriers to adequate lines of sight. As such, no significant project access impacts would occur and no further analysis is required.

## L.6. Transit System Capacity

- **Will an Environmental Impact Report (EIR) be prepared for the Proposed Project to evaluate potential transportation impacts?**

This issue involves the potential impacts of the Proposed Project on the existing transit system ridership and capacity from the increased demand by project residents, employees, patrons, etc. According to the *L.A. CEQA Thresholds Guide* (2006), the determination of significance shall be made on a case-by-case basis, considering the projected number of additional transit passengers expected with implementation of the Proposed Project and available transit capacity. Because the Proposed Project does not generate more than 20 construction workers at any one time, and would include only six permanent employees once operational, no adverse impacts to transit capacity is expected. As such, no significant project impacts to transit capacity would occur and no further analyses is required.

## L.7. Parking

- **Would the project's proposed parking supply be less than that required by City code, including Los Angeles Municipal Code (LAMC), Transportation Specific Plan (TSP) or Interim Control Ordinance (ICO) requirements, prior to applying for a variance, exemption, or amendment, if any apply to the project?**
- **If the project is located within the coastal zone (generally, 1,000 yards inland of the mean high tide line), would the project's proposed parking supply be less than that required by California Coastal Commission requirements?**

According to the *L.A. CEQA Thresholds Guide* (2006), a "no" response to all of the preceding questions indicates that there would normally be no significant parking impacts from the Proposed Project. A project would normally have a significant impact on parking if the project provides less parking than needed as determined through an analysis of demand from the project.

Section 13 of the Venice Specific Plan specifically addresses parking standards and requirements as well as Beach Impact Zone parking requirements for new development within the Venice Coastal Zone. Within the Venice LCP, Policy II. A. 3. Parking Requirements, outlines parking requirements that shall apply to all new development. For a Public Utility Facility not having a Business Office on the premises, the parking requirement is to provide 2 spaces, plus 1 space for each 500 square feet of floor area. Additionally, the policy states that parking shall be provided pursuant to a detailed parking study that demonstrates that the project will provide adequate parking to meet the needs of the development without causing negative impacts to coastal access or access to public recreational facilities.

The Parking Assessment Memorandum dated October 3, 2016, prepared by Fehr & Peers addresses impacts to parking and is found in Appendix J of this Draft EIR. As noted below, that analysis determined that impact to parking from the Proposed Project would be less than significant.

Parking utilization surveys were conducted bi-hourly from 8:00 a.m. to 10:00 p.m. near the Project Site on a typical weekend day and a typical weekday (Saturday, September 12 and Thursday September 17, 2015). These days were selected to represent typical weekend and weekday conditions. Counts were collected of on-street public parking and one off-street public lot in a study radius of approximately 0.3 mile around the Project Site. The number of available parking spaces for each roadway segment or lot was inventoried at the beginning of data collection efforts. Parking utilization was separated between unrestricted parking and any restricted parking for a given location. The only time-restricted parking within the vicinity of the Project Site is the metered spaces located along Strongs Drive between Anchorage Street and Washington Boulevard, while the remaining spaces are only restricted per their respective scheduled street-sweeping and trash collection days.

Once construction begins, Hurricane Street will be permanently closed to traffic between Esplanade and Canal Court. This will result in the loss of five on-street parking spaces. Additionally, the segment of Canal Court adjacent to the project site will be temporarily closed during the construction period; however, parking is prohibited there.

The Venice Pumping Plant currently requires two employees per 8-hour shift (three shifts over a 24-hour period) and two parking spaces are located within the VPP site. Once VAPP becomes operational, this staffing level will remain unchanged. Thus VAPP/VPP would require up to four parking spaces at the peak time, when shift changes occur. Per the Venice Specific Plan and the Venice Local Coastal Program Land Use Plan, the project must also provide one space for Beach Impact Zone parking. The proposed project will construct eight off-street parking spaces at 128 Hurricane Street, which will fully satisfy the need for replacement parking (five spaces), employee parking (four spaces including the existing two off-street employee spaces within the VPP), and the one new space required as Beach Impact Zone parking. During the 2-year construction period of the VAPP, the loss of the five existing parking spaces from Hurricane Street between Canal Court and the Grand Canal would temporarily reduce the parking supply in the project vicinity. This will affect the convenience of drivers seeking to park, by reducing the total supply of on-street parking in the neighborhood around the VAPP site, although the total on-street parking in the vicinity could still accommodate these vehicles. The Parking Assessment Draft Memorandum concluded the existing available parking supply near the Project Site is sufficient under normal circumstances to accommodate the parking spaces that would be temporarily displaced during construction of the Proposed Project. In addition, within approximately 1,000 feet of the Project Site, at least 70 spaces were available during the

weekday peak period and at least 11 spaces were available during the busier weekend peak period. It is recognized, however, that during peak times on peak summer weekend days and weekdays and holidays, parking utilization is higher than what was observed on the survey dates. On those days, the temporary loss of these on-street spaces would be expected to result in an increase in vehicles circling through the neighborhood as they seek available parking. However, under normal operating conditions, this impact is less than significant.

With implementation of the proposed parking spaces, the project's parking supply would comply with City codes, plans, and ordinances. While the project is located within the coastal zone, the project's proposed parking supply would meet California Coastal Commission requirements. Upon project completion, the on-street parking on Hurricane Street east of Canal Court would be fully replaced off-street at 128 Hurricane Street. In addition, the proposed VAPP project, together with the existing VPP facility, would provide four employee parking spaces, sufficient to accommodate its needs, as well as one additional space as required for Beach Impact Zone parking. Thus, upon completion the project would result in one additional parking space in the project vicinity. As such, no significant project impacts to parking would occur and no further analysis is required.

### **L.8. In-Street Construction Impacts**

- **Would a project not exempted in Article VII of the City CEQA Guidelines require construction activities to take place within a major or secondary highway ROW which would necessitate temporary lane, alley, or street closures for more than one day (including day and evening hours, and including overnight closures if on a residential street)?**
- **Would a non-exempt project require construction activities to take place within a collector or local street ROW which would necessitate temporary lane, alley, or street closures for more than seven days (including day and evening hours, and including overnight closures if on a residential street)?**
- **Would in-street construction activities result in the loss of regular vehicular or pedestrian access to an existing land use for more than one day, including day and evening hours and overnight closures if access is lost to residential units?**
- **Would in-street construction activities result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the Project Site?**

The Proposed Project does not require construction activities to take place within a major or secondary highway right-of-way that would necessitate temporary lane, alley, or street closures for more than one day.

The majority of construction traffic disruptions would occur on Hurricane Street and Canal Court, since a portion of both local streets would be temporarily closed. As such, construction would result in repeated overnight closures on a residential street. The Proposed Project would result in closure of a local street right-of-way, which would necessitate temporary lane, alley, or street closures for more than seven days.

In addition, pedestrian access to the Grand Canal from Hurricane Street would be temporarily restricted during construction and pedestrians would be diverted to Galleon Street to the north. Therefore, in-street construction activities would result in the loss of regular pedestrian access for more than one day.



In-street construction activities would not result in the temporary loss or relocation of an existing bus stop that serves the Project Site. The nearest bus stop, which is located to the west along Pacific Avenue, would not be affected.

According to the *L.A. CEQA Thresholds Guide* (2006), a "yes" response to any of the preceding questions indicates that further study may be required. As such, the Proposed Project could result in impacts from in-street construction, and this impact is discussed further below.

### 3.10.3.3 Thresholds of Significance

Thresholds of significance used in this EIR to analyze impacts are based on CEQA Appendix G and on the *L.A. CEQA Thresholds Guide* (2006).

According to Appendix G of the CEQA Guidelines, a project would normally have a significant impact on transportation and traffic if it would:

**TRANS-1.** Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass

**TRANS-2.** Conflict with an applicable congestion management program, including, but not limited to, level-of-service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways

**TRANS-3.** Result in inadequate emergency access

Based on the Initial Study and the Screening Criteria addressed above, the applicable thresholds of significance from the *L.A. CEQA Thresholds Guide* (2006) for Transportation and Traffic are as follows:

**TRANS-4. L.8.** In-Street Construction Impacts: The determination of significance shall be made on a case-by-case basis, considering the following factors:

- Temporary Traffic Impacts:
  - 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 traffic levels and level of service (LOS) 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.
- Temporary Loss of Access:
  - The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;
  - The availability of alternative 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.

- Temporary Loss of Bus Stops or Rerouting of Bus Lines:
  - 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).
- Temporary Loss of On-Street Parking:
  - The current utilization of existing on-street parking;
  - The availability of alternative parking locations or public transit options (e.g. bus, train) within ¼ mile of the Project Site; and
  - The length of time that existing parking spaces would be unavailable.

### 3.10.3.4 Construction Impacts

The analysis below describes the temporary impacts related to traffic and transportation anticipated as a result of the Proposed Project during construction.

The City of Los Angeles requires implementation of Worksite Traffic Control Plans (WTCPs) to ensure that any construction-related impacts are minimized to the greatest extent possible. These WTCPs typically require delineation of base conditions; construction impact areas; site-specific detour operations, such as traffic striping, pavement and curb markings; traffic control signs; signals; delineators; barricades; and traffic management requirements.

Some local streets, however, 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 of Los Angeles' policy is to allow trucks to travel in a "reasonable fashion" to and from a work site. The City of Los Angeles reviews each haul-route permit for specific application of its general guidelines. Trucks traveling to and from the site for the export of soil would use a specific haul route to Laydown Area 3, located at a City-owned property at 9940 Jefferson Boulevard in Culver City. It is expected that the haul route for soil export and import would follow Hurricane Street, Canal Court, Galleon Street, Pacific Avenue, Washington Boulevard, and Lincoln Boulevard.

**TRANS-1. Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.**

During construction of the Proposed Project, personnel, materials, and machinery would utilize the freeway system and local street system to access the site. Pacific Avenue, Canal Court, and Hurricane Street provide access to the Project Site and are residential collector streets that experience moderate to low traffic volumes during both day and evening peak-periods. During weekends and summer months, these levels are elevated. There are no known exceedance capacities for pedestrian, bicycle paths, or the mass transit system associated with these streets or areas.

The entire Project Site would be fenced and Hurricane Street, between Canal Court and the Esplanade, would be permanently closed to the public. During Stage 1 of construction, a portion of Hurricane Street and Canal Court would be temporarily closed. Both Hurricane Street and Canal Court are narrow roadways that do not allow two vehicles to pass at the same time. This condition creates the need for drivers to wait to pass one another. Although during construction of the Proposed Project, procedures would be taken to ensure that all construction equipment, machinery, and construction personnel vehicles are kept off of these roadways, there is the potential for access to be blocked temporarily during loading and unloading activities or transport. At this stage of construction, pedestrian access along the Esplanade, Ballona Lagoon, and the Grand Canal would be maintained at Canal Court. However, pedestrian access to the Grand Canal from Hurricane Street would be eliminated; pedestrians would be diverted to Galleon Street to the north. The Esplanade would be reopened to pedestrian access on the west side of the Grand Canal following completion of Stage 6 of construction. During the construction period at locations where construction activity would occur within public street right-of-way or in areas accessible to the public, increased safety risks to vehicles, bicyclists, and pedestrians could result from construction activities within or adjacent to affected sites due to narrowed lanes, altered travel patterns, and temporarily obstructed sidewalks.

Trip generation estimates that were prepared for the project were based upon projected staffing and vehicle activity levels. Trip generation estimates represent a worst-case scenario in that it considers the upper bounds of impacts likely to be experienced on the street system in the immediate vicinity of the site where construction activities could result in temporary lane closures and loss of on-street parking. It was found that the soil hauling during Stages 1 to 4 would generate the highest number of daily trips to and from the site. Preliminary analysis indicates that approximately 10,000 cubic yards of soil would need to be excavated from the site during Stages 1 and 2, including 2,300 cubic yards that would be exported to Laydown Area 1 and 7,700 cubic yards to be exported to Laydown Area 3. If needed, up to 3,850 cubic yards will be imported (returned) to the site for backfill during States 3 and 4. The balance of the exported soil is expected to be used as cover at an area landfill.

The anticipated peak estimate for the number of required truckloads for excavation is 48 one-way trips per day. The anticipated peak estimate for construction worker trips at the construction site is 6 trips per day. Including the 2 other trips for materials and equipment delivery, as mentioned above, a total of 58 daily trips is anticipated to be the worst-case scenario. The number of construction workers and construction equipment would actually vary throughout the construction process in order to maintain a reasonable schedule of completion. In addition, construction workers would be onsite at 7:30 a.m. and would typically leave the Project Site by 6:00 p.m. As a result, it is assumed that the construction worker traffic would occur during the morning and afternoon peak commute hours, but it would be considered negligible. Further, deliveries would be staggered throughout the day and coordinated to be delivered at off-peak commute times. Because construction worker traffic is negligible and material truck trips would be staggered through the day, traffic from construction trips is not expected to create a significant impact on the street system. While impacts are expected to be less than significant, incorporation of MM TRANS-1 Construction Worker Shuttles will ensure construction worker daily trips to the site are consolidated.

During the various construction phases of the project, travel by construction workers and truck hauling of supplies and disposal would generate trips on the regional and local transportation system surrounding construction site. These trips would represent temporary increases during defined phases of construction and, upon completion of construction, would cease. The primary off-site impacts resulting from the movement of construction trucks would include a short-term and intermittent lessening of roadway capacities due to the slower movements and larger turning radii

of the trucks compared to passenger vehicles. Drivers could experience delays if they were traveling behind a heavy truck. It is assumed that the soil hauling truck traffic would occur before the morning and afternoon peak commute hours. As such, the construction traffic impacts on the regional transportation network associated with the project would be short-term in nature and limited to the period of time when construction activity is taking place.

The added traffic would be most apparent on the local roadways serving the site, but as described above, this would be short-term in nature and the vehicle the trips would be distributed throughout the day (not all 58 vehicle trips would occur during the AM or PM peak hours). In addition, temporary street closures along Canal Court and Hurricane Street (see Chapter 2, Project Description) would not result in adverse traffic impacts on surrounding neighbors since alternate access would be available. Therefore, the Proposed Project would not exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit, and impacts would be **less than significant**; no mitigation measures are required.

**TRANS-2. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

The CMP arterial monitoring intersection nearest to the Project Site is located at Lincoln Boulevard (SR 1) and SR 90 (Marina Expressway), which is approximately 1.2 miles to the northeast. Additionally, two additional arterial monitoring locations are located at the intersection of Lincoln Boulevard and Venice Boulevard (SR 187), approximately 1.3 miles to the northwest of the Project Site. As described above, the CMP requires analysis of traffic conditions at all CMP arterial monitoring intersections where the Proposed Project would add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. The CMP also requires that traffic studies analyze mainline freeway monitoring locations where the project would add 150 or more trips in either direction during either AM or PM weekday peak hours. As noted previously, the Proposed Project would add up to an estimated 58 daily trips, spread over an approximately 9-hour period, related to excavation, material deliveries, and worker commutes during the construction phase of the Proposed Project (construction equipment operation hours are proposed to be Monday through Saturday from 8:00 a.m. to 6:00 p.m.; soil trucks are proposed to be at the Project Site only between 9:00 a.m. and 4:00 p.m. [see MM NOI-1]). As such, the project would not trigger a CMP analysis and implementation of the Proposed Project would not result in a potentially significant impact related to an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. Therefore, impacts would be **less than significant**, and no mitigation measures are required.

**TRANS-3. Result in inadequate emergency access**

The entire Project Site would be fenced and Hurricane Street, between Canal Court and the Esplanade, would be permanently closed to the public. During Stage 1 of construction, a portion of Hurricane Street and Canal Court would be temporarily closed. Both Hurricane Street and Canal Court are currently narrow roadways that do not allow two vehicles to pass at the same time. This condition creates the need for drivers to wait to pass one another. Construction activities would

maintain this similar condition. During construction of the Proposed Project, procedures would be taken to ensure that all construction equipment, machinery, and construction personnel vehicles are kept off of these roadways. However, there is the potential for access to be temporarily blocked during loading and unloading activities or transport. As such, construction-related activities have the potential to result in temporary and periodic inadequate emergency access. Wherever possible, delivery trucks would be brought onto the Project Site and be loaded and unloaded within the perimeter fence of the construction site. To reduce the potential construction traffic impacts associated with the Proposed Project, Mitigation Measure MM-TRANS-2 would be implemented; this measure would require all construction activities to be conducted in accordance with an approved construction traffic control plan and requires advance notice to emergency service providers. This would serve to reduce the construction-related traffic impacts to the maximum extent feasible. MM TRANS-1 Construction Worker Shuttles would also help reduce construction-related traffic impacts on Hurricane Street. Therefore, construction of the Proposed Project would not result in inadequate emergency access and impacts would be **less than significant with mitigation**.

#### **TRANS-4. L.8. Result in In-Street Construction Impacts**

According to the *L.A. CEQA Thresholds Guide*, the determination of significance related to in-street construction shall be made on a case-by-case basis, considering several factors. These are each discussed below.

#### **Temporary Traffic Impacts**

The City of Los Angeles has established threshold criteria to determine significant traffic impacts of a Proposed Project in its jurisdiction. Although the methodologies and the criteria to calculate volume-to-capacity (V/C) ratios for intersections are intended by LADOT to identify potential traffic impacts during operation, they can also be applied to construction periods.

Under the City of Los Angeles guidelines, a project would be considered to significantly affect a local residential street if the projected increase in daily traffic volumes is as follows:

<b>Projected Average Daily Traffic (ADT) with Project (Final ADT)</b>	<b>Project-Related Increase in ADT</b>
0 to 999	120 or more
1,000 to 1,999	12% or more of final ADT
2,000 to 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT

Source: Fehr & Peers 2016.

Based on these guidelines, VAPP construction activity would not result in any significant traffic impacts on study area streets because the maximum number of daily project trips is estimated to be 58 one-way trips (or 108 PCEs), which is below the minimum threshold volume considered significant. Therefore, the Proposed Project's in-street construction impacts related to temporary traffic impacts would be **less than significant**, and no mitigation measures are required.

#### **Temporary Loss of Access**

The entire Project Site would be fenced and Hurricane Street, between Canal Court and the Esplanade, would be closed to the public. During Stage 1 of construction, a portion of Hurricane Street and Canal Court would be temporarily closed and pedestrian access to the Grand Canal

from Hurricane Street would be eliminated; pedestrians would be diverted to Galleon Street one block to the north or would be able to utilize Canal Court extending south to the Esplanade. Hurricane Street and Esplanade would be re-opened to pedestrian access on the west side of the Grand Canal following completion of Stage 6 of construction. Therefore, the Proposed Project would result in temporary loss of access impacts that would be **less than significant**; no mitigation measures are required.

### **Temporary Loss of Bus Stops or Rerouting of Bus Lines**

The nearest bus stop to the Project Site is located at the corner of Pacific Avenue and Hurricane Street, approximately 0.7 mile to the west. Construction activities would not result in disruption to the existing bus stop or bus service, as no improvements would occur within the vicinity of the bus stop. Additionally, access to this bus stop would remain unchanged throughout project construction. Therefore, the Proposed Project **would not result in in-street construction impacts** related to temporary loss of bus stops or rerouting of bus lines; no mitigation measures are required.

### **Temporary Loss of On-Street Parking**

As noted in the Parking Assessment Memorandum (Fehr & Peers 2016), within a study radius of 0.3 mile, there are an estimated 763 publicly available parking spaces, including 399 publicly available on-street spaces and 364 spaces at the public parking lot. This also includes 8 time-restricted parking spaces and 391 unrestricted parking spaces. During construction, a portion of Hurricane Street and Canal Court would be temporarily closed and parking spaces on Hurricane Street between Canal Court and the Esplanade would be unavailable. The loss of these spaces represents 0.65% of the total parking supply in the area.

Hurricane Street, where the Project Site is located, contains restricted on-street parking and parking is prohibited on Canal Court. There are approximately 19 parking spaces along Hurricane Street between Canal Court and Pacific Avenue. On weekend peak hours, parking on Hurricane Street is highly utilized and is greater than 85 percent. On weekday peak hours, parking on Hurricane Street is also highly utilized and is greater than 85 percent on the south side of the street but has a lower utilization less than 50 percent on the north side of the street. During construction, the loss of these on-street parking spaces would be expected to result in an increase in vehicles circling through the neighborhood as they seek available parking close to their residence. This impact could be adverse during peak hours, but is not considered to be significant because of the temporary nature of the construction activities. In addition, it is not considered significant because, within approximately 1,000 feet of the Project Site, at least 70 spaces are available during the weekday peak period and at least 11 spaces are available during the busier weekend peak period. It is noted however, that during peak times on peak summer weekend days and weekdays and holidays, it is recognized that parking utilization is higher than what was observed on the survey dates. On those days, the loss of these on-street spaces would be expected to result in a further increase in vehicles circling through the neighborhood as they seek available parking close to their destinations.

Because there is adequate supply during normal peak periods (the loss of these spaces represents less than 1% of the total parking within a 0.3-mile radius) and the loss of parking would be a temporary impact that would occur only during construction, as parking spaces would be provided at the 128 Hurricane Street lot upon completion of the Proposed Project, the Proposed Project **would not result in significant in-street construction impacts** related to loss of on-street parking, and no mitigation measures are required.

### 3.10.3.5 Operational Impacts

The analysis below describes the permanent impacts related to traffic and transportation anticipated as a result of the Proposed Project during operation.

**TRANS-1. Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit**

The Proposed Project would require a total of six full-time employees, with two employees per shift working three consecutive eight-hour shifts. It is assumed that these employees would generally arrive two at a time to the job site via their personal automobiles and park at the 128 Hurricane Street lot. The addition of these twelve new one-way operation-related trips to the circulation and/or intersection or highway/freeway network would not generate levels that would exceed the capacity of these systems. Similarly, these trips would not exceed the capacity of the existing mass transit, pedestrian, or bicycle path system since adequate capacity currently exists and they would not generate sufficient trips to overwhelm these systems.

Pedestrian access to the Esplanade and the associated Grand Canal and Ballona Lagoon from Hurricane Street would be maintained during operations. Access during operations would also continue to be available from existing locations along Galleon Street and Canal Court. As such, implementation of the Proposed Project would not exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. **Therefore, no adverse impacts would occur, and no mitigation is required.**

**TRANS-2. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways**

As described above, the CMP requires analysis of traffic conditions at all CMP arterial monitoring intersections where the Proposed Project would add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. The CMP also requires that traffic studies analyze mainline freeway monitoring locations where the project will add 150 or more trips in either direction during either AM or PM weekday peak hours. The Proposed Project would require two full-time employees (per shift) during operation, which would generate up to six new daily one-way trips. Implementation of the Proposed Project would not add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. As such, the Proposed Project would not result in a potentially significant impact related to an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. **Therefore, no adverse impacts would occur, and no mitigation is required.**

**TRANS-3. Result in inadequate emergency access**

The roadways surrounding the Project Site would remain accessible during operation of the Proposed Project. In addition, the City requires that development plans be submitted to the City for review and approval to ensure that new development has adequate access, including driveway

access and turning radius in compliance with existing City regulations. As such, operation-related activities do not have the potential to result in inadequate emergency access; **no impacts would occur, and no mitigation is required.**

#### **TRANS-4. L.8. In-Street Construction Impacts**

This threshold relates to construction impacts and does not apply to operational impacts. No further analysis is required.

### **3.10.4 Mitigation Measures**

Proposed mitigation consists of the following measure to reduce the temporary adverse impacts associated with construction-period activity in the vicinity of the construction site. The implementation of the following mitigation measure would ensure that traffic/transportation impacts would be less than significant.

#### **MM- TRANS-1: Construction Worker Shuttles**

Construction workers would park at an off-site location and be shuttled to and from the Project Site each workday on 10 to 15-passenger shuttles or vans. While no specific off-site location has been identified at this time, it would likely lie within five miles of the Project Site. The selected contractor would be required to identify and secure a suitable location

#### **MM-TRANS-2. Coordination with Emergency Service Providers**

To minimize impacts on emergency access to the site during construction, the contractor, on behalf of the LABOE, shall coordinate with emergency service providers (police, fire, ambulance and paramedic services), prior to initiating construction, to provide advance notice of any lane closures, construction hours, and changes to local access and to identify alternative routes where appropriate.

### **3.10.5 Significant Unavoidable Adverse Impacts**

There would be no significant unavoidable adverse impacts to traffic/transportation conditions due to implementation of the Proposed Project.

### **3.10.6 Cumulative Impacts**

The study area for the cumulative traffic analyses encompasses the streets and roadways in the vicinity of the Project Site. Since the Proposed Project would result in no adverse operational traffic or parking impacts, it would not contribute to any adverse cumulative operational impacts that could occur due to related growth and development, and no further discussion is required. With regards to cumulative traffic impacts during construction, eight related projects (see Chapter 1) have been identified in the study area. Only two of those projects, Via Dolce Park and Venice Dual Force Main, have identified construction schedules that would overlap with VAPP. As shown in Table 3.10-1, two of six study intersections were projected (2011) to operate at unacceptable levels of service of E or F during one or both peak hours. Construction traffic generated by the two related projects could result in additional congestion at these and other intersections in the project area. As discussed in the VAPP construction impact analyses above, the Proposed Project could generate up



to 48 daily vehicle trips during the construction period. Those vehicle trips, combined with the construction vehicle trips due to the related projects, could cumulatively exacerbate already congested conditions at study area intersections. However, the impacts due to construction traffic would be temporary, and as noted above, the City of Los Angeles considers construction-related traffic impacts adverse but not significant because such impacts, while sometimes inconvenient, are only temporary. Therefore, the Proposed Project's contribution to significant cumulative traffic impacts during construction would not be cumulatively considerable.

