

5.13 TRANSPORTATION

This section describes the existing environmental and regulatory settings related to traffic and transportation, including a description of roadways in the area and the existing traffic conditions. This section also discusses potential impacts on transportation and traffic that would result from implementation of the project and provides mitigation measures to reduce these impacts, where necessary.

The information and analysis in this section is based on the *La Brea Tar Pits Master Plan Final Transportation Assessment* (Transportation Assessment) prepared by Kittelson and Associates (Appendix J). While the project site is owned by the County of Los Angeles (County), the street system surrounding the project site is within the jurisdiction of the City of Los Angeles (City). As such, the Transportation Assessment was prepared pursuant to the City of Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines (TAG) and the approved Memorandum of Understanding between the City and the County of Los Angeles Museum of Natural History (Museum of Natural History), dated May 2, 2022.

The Transportation Assessment includes additional analysis and project recommendations beyond the purview of a CEQA analysis. The report can be found in its entirety in Appendix J of this EIR.

5.13.1 Existing Conditions

For the purposes of this transportation analysis, the project site and the area surrounding the project site are collectively referred to as the transportation study area (Figure 5.13-1).

5.13.1.1 Roadway Network

The roadway system in the transportation study area consists of avenue, collector, and local streets that serve local and regional traffic demand. The roadways in the transportation study area are discussed below. Classifications are illustrated in Figure 5.13-2; modal priorities are illustrated in Figure 5.13-3. The classifications presented below are defined in the City's *Mobility Plan 2035*.

AVENUE I AND AVENUE II STREETS

Avenue I and Avenue II streets are major thoroughfares that are designed to have 100 feet of right-of-way and 70 feet of roadway width for Avenue I streets, and 86 feet of right-of-way and 56 feet of roadway width for Avenue II streets.

Wilshire Boulevard is an Avenue I street on the southern border of the project site. The road has a four-lane cross section with a center median that has eastbound left-turn lanes at intersection approaches. Both eastbound and westbound directions have a joint parking lane/bus lane along the curb that allow for vehicle parking except during weekday a.m. and p.m. peak periods, where buses and right-turning vehicles have exclusive access to these lanes. The curb-to-curb roadway width is approximately 76 feet and the posted speed limit is 35 miles per hour (mph). Wilshire Boulevard has multiple modal priorities; it is on the Transit Enhanced Network (Comprehensive Transit Enhanced Street), Bicycle Lane Network (Tier 2 Bicycle Lane), and Pedestrian Analysis Network. Wilshire Boulevard (east of Fairfax Avenue) is on the City's Vision Zero High-Injury Network.



Figure 5.13-1. Transportation study area.



Figure 5.13-2. Roadway classifications near the project site.



Figure 5.13-3. Modal priorities near the project site.

Fairfax Avenue is an Avenue II street on the western border of the block that includes the project site as well as the Los Angeles County Museum of Art (LACMA) and the Academy Museum of Motion Pictures. The road has a four-lane cross section with a center median that allows for left-turning vehicles at intersections. There are also designated right-turn lanes on the northbound approach to West 6th Street and the southbound approach to Wilshire Boulevard. There is limited street parking on the west side of the street. The curb-to-curb roadway width is approximately 60 to 68 feet (depending on the presence of parking and right-turn lanes), and the posted speed limit is 35 mph. Fairfax Avenue has multiple modal priorities; it is on the Transit Enhanced Network (Moderate Transit Enhanced Street), Bicycle Lane Network (Tier 3 Bicycle Lane), and Pedestrian Analysis Network.

6th Street is an Avenue II street on the northern border of the project site. The road has a three-lane cross section (two westbound lanes and one eastbound lane) with a center median that allows for left-turning vehicles at intersections. There are designated right-turn lanes at the eastbound approach to the Fairfax Avenue intersection and at the westbound approaches to the LACMA parking garage and Curson Avenue intersections. Street parking is available along most of the north side of the street, except for at the eastbound turn lane at South Fairfax Avenue, while parking on the south side of the street is provided for portions of the street east of the LACMA parking garage driveway. The curb-to-curb roadway width is approximately 58 feet, and the posted speed limit is 35 mph. 6th Street has multiple modal priorities; it is on the Neighborhood Enhanced Network (Neighborhood Network west of Wilshire Boulevard), Bicycle Enhanced Network (Tier 1 Protected Bicycle Lanes), and Pedestrian Analysis Network. 6th Street (east of Ogden Drive) is on the City's Vision Zero High-Injury Network.

COLLECTOR STREETS

Collector streets are lower-volume roadways (compared to Avenue I/II streets) that are designed to have 66 feet of right-of-way and 40 feet of roadway width.

Curson Avenue is a Collector street on the eastern edge of the project site. The road has a two-lane cross section and a northbound left-turn lane at the West 6th Street intersection. There is no on-street parking allowed on either side of the road. The west side of Curson Avenue fronting the project site between the site driveway and the bend in Curson Avenue is a dedicated loading zone for buses. The curb-to-curb roadway width is approximately 36 to 40 feet (depending on the presence of the northbound left-turn lane), and there is no posted speed limit. Curson Avenue south of 8th Street is on the Neighborhood Enhanced Network.

8th Street is a Collector street south of the project site. The road has a two-lane cross section. Between Fairfax Avenue and Curson Avenue, there is diagonal and parallel parking on the north side of the street, and parallel parking on the south side of the street. The curb-to-curb roadway width is approximately 40 to 55 feet (depending on the presence of diagonal parking), and there is no posted speed limit.

LOCAL STREETS

Local streets are low-volume roadways that are designed to have 60 feet of right-of-way and 36 feet of roadway width.

Ogden Drive is a Local street to the south of the project site that intersects with Wilshire Boulevard (Ogden Drive also intersects with West 6th Street on the north side of the project site, but this is a private roadway with gated access). The road has a two-lane cross section with no marked centerline beyond the immediate intersection area with Wilshire Boulevard, and there are separate northbound left- and right-turn lanes as the street terminates at Wilshire Boulevard. Street parking is allowed on both sides of the street. The curb-to-curb roadway width is approximately 38 to 48 feet (depending on the presence of turn lanes at Wilshire Boulevard), and there is no posted speed limit.

Spaulding Avenue is a Local street to the south of the project site that intersects with Wilshire Boulevard. The road has a two-lane cross section with no marked centerline beyond the immediate intersection area with Wilshire Boulevard. Street parking is allowed on both sides of the street. The curb-to-curb roadway width is approximately 38 feet, and there is no posted speed limit.

Orange Grove Avenue is a Local street south of the project site that intersects with Wilshire Boulevard and with 8th Street. It is a two-lane roadway with no marked centerline. On-street parking is allowed. North of 8th Street, the curb-to-curb width is approximately 35 feet. There is no posted speed limit.

Stanley Avenue is a Local street south of the project site that intersects with Wilshire Boulevard and with 8th Street. It is a two-lane roadway with no marked centerline. On-street parking is allowed. North of 8th Street, the curb-to-curb width is approximately 28 feet. There is no posted speed limit.

5.13.1.2 Existing Vehicle Volumes

Weekday and weekend multimodal (vehicle, bicycle, and pedestrian) counts were collected within the transportation study area in May 2022 to establish the existing transportation context. The study intersections and roadway segments are shown in Figure 5.13-1 and Figure 5.13-2 and additional information on the count data is provided in Appendix J.

Because of the ongoing changes to travel patterns since the start of the COVID-19 pandemic in spring 2020, as well as construction on Wilshire Boulevard during the weekday morning and midday periods, the weekday counts were generally lower than historical counts. Counts collected for the project were compared to historical intersection data from various years to create adjustments for existing intersection volumes. Adjustment methodology was verified and approved by City staff as part of the Transportation Assessment (see Appendix J).

EXISTING INTERSECTION VOLUMES

Automobile turning movement counts were collected at the five intersections shown in Table 5.13-1. Traffic counts were collected on Thursday, May 12, 2022, during the weekday morning (7:00 a.m. to 9:00 a.m.), midday (12:00 p.m. to 2:00 p.m.), and evening (4:00 p.m. to 6:00 p.m.) peak periods. Traffic counts were also collected on Saturday, May 14, 2022, during the Saturday midday (12:00 p.m. to 2:00 p.m.) peak period.

Table 5.13-1. Study Intersections

ID	Intersection	Traffic Control
1	Ogden Drive/Parking Garage/West 6th Street	Signalized
2	Curson Avenue/West 6th Street	Signalized
3	Ogden Drive/Wilshire Boulevard	Signalized
4	Spaulding Avenue/Wilshire Boulevard	Signalized
5	Curson Avenue/Wilshire Boulevard	Signalized

The May 2022 study intersection counts were compared to data collected between 2012 and 2015. It was found that the weekday a.m. peak hour counts were an average of 51% higher in previous years compared

to 2022; weekday midday counts were 35% higher, weekday p.m. counts were 28% higher, and Saturday midday counts were 70% higher. Therefore, it was concluded that:

- 51% growth would be applied uniformly to the May 2022 weekday a.m. peak hour intersection volumes to obtain the adjusted existing conditions volumes.
- 35% growth would be applied uniformly to the May 2022 weekday midday peak hour intersection volumes to obtain the adjusted existing conditions volumes. The exception is the Curson Avenue/West 6th Street intersection, where May 2022 counts would be used for the weekday midday peak hour since those were higher than historical counts.
- 28% growth would be applied uniformly to the May 2022 weekday p.m. peak hour intersection volumes to obtain the adjusted existing conditions volumes.
- 70% growth would be applied uniformly to the May 2022 Saturday midday peak hour intersection volumes to obtain the adjusted existing conditions volumes. The exception is the Curson Avenue/West 6th Street intersection, where May 2022 counts would be used for the Saturday midday peak hour since those were higher than historical counts.

EXISTING ROADWAY SEGMENT VOLUMES

Table 5.13-2 identifies the seven roadway segments where 24-hour bidirectional vehicle volumes were collected on Thursday, May 12, 2022, and Saturday, May 14, 2022. Figure 5.13-1 shows the location of these roadway segments.

Table 5.13-2. Study Roadway Segments

Roadway	Extent
8th Street	between Fairfax Avenue and Orange Grove Avenue
Orange Grove Avenue	between Wilshire Boulevard and 8th Street
Ogden Drive	between Wilshire Boulevard and 8th Street
Spaulding Avenue	between Wilshire Boulevard and 8th Street
Stanley Avenue	between Wilshire Boulevard and 8th Street
Curson Avenue	between Wilshire Boulevard and 8th Street
8th Street	between Stanley Avenue and Curson Avenue

The May 2022 roadway segment weekday data were compared to data collected between 2014 and 2016. It was found that the weekday daily volumes along these roadway segments were approximately 36% higher in previous years compared to 2022. Therefore, it was concluded that:

- A 36% growth rate would be applied to the May 2022 weekday daily volumes at locations where historical volumes were higher.
- Since historical weekend counts were not available, the ratio of volumes between weekday and weekend from the 2022 counts was applied to the adjusted weekday volumes.

Table 5.13-3 provides the adjusted weekday and Saturday daily volumes at the identified roadway segments.

Table 5.13-3. Existing 2022 (Adjusted) Daily Segment Volumes

Roadway	Extent	Weekday Daily Volume	Weekend Daily Volume
8th Street	between Fairfax Avenue and Orange Grove Avenue	7,343	4,780
Orange Grove Avenue	between Wilshire Boulevard and 8th Street	9,262	4,633
Ogden Drive	between Wilshire Boulevard and 8th Street	787	1,154
Spaulding Avenue	between Wilshire Boulevard and 8th Street	536	931
Stanley Avenue	between Wilshire Boulevard and 8th Street	2,006	1,372
Curson Avenue	between Wilshire Boulevard and 8th Street	1,216	784
8th Street	between Stanley Avenue and Curson Avenue	7,013	4,972

Source: Kittelson and Associates (2022); National Data and Surveying Services (2022).

5.13.1.3 Public Transit Facilities and Service

The transit system in the transportation study area consists of local bus service, as well as planned heavy rail service.

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY BUS SERVICE

There are three Los Angeles County Metropolitan Transportation Authority (Metro) bus routes that run on roads that parallel the project site.

- **Line 20 (Downtown Los Angeles – Westwood/Santa Monica via Wilshire Boulevard)** runs between Downtown Los Angeles and Santa Monica on Wilshire Boulevard along the entire route between these two destinations. Service runs 7 days a week; the bus runs 24 hours, with 15-minute headways during daylight hours and 30-minute headways during overnight every day of the week. Stops near the project site are located at Wilshire/Spaulding and Wilshire/Curson for both directions of travel.
- **Line 217 (Hollywood/Vine Station – La Cienega Station via Hollywood Boulevard-Fairfax Avenue)** runs between Los Angeles’ Los Feliz and Baldwin Hills neighborhoods, on Vermont Avenue, Hollywood Boulevard, and Fairfax Avenue along the west side of the project site. Service runs 7 days a week; the bus runs on 12- to 15-minute headways for the majority of the day every day of the week, with longer headways at the beginning and end of service. Stops near the project site are located at Fairfax/West 6th and Fairfax/Wilshire for both directions of travel.
- **Line 720 (Santa Monica – Downtown Los Angeles via Wilshire Boulevard)** runs between Downtown Los Angeles and Santa Monica on Wilshire Boulevard along the entire route between these two destinations. Service runs 7 days a week; the bus runs on 5- to 10-minute headways for the majority of the day, with 15-minute headways during overnight hours of service. This is an express bus with limited stops, so the closest bus stops to the project site are at Wilshire/Cloverdale and at Wilshire/Crescent Heights.

LOS ANGELES DEPARTMENT OF TRANSPORTATION DASH BUS SERVICE

The Los Angeles Department of Transportation (LADOT) runs DASH Fairfax service on Wilshire Boulevard and Fairfax Avenue, connecting to Melrose Avenue and the Cedars-Sinai Medical Center. Service runs 7 days a week on 30-minute headways. Weekday service operates from 6:00 a.m. to 7:30 p.m., and weekend service operates from 9:00 a.m. to 7:00 p.m. DASH Fairfax services only

westbound on Wilshire Boulevard and northbound on Fairfax Avenue. Stops near the project site are located at Wilshire/Curson, Wilshire/Ogden, Wilshire/Fairfax, and Fairfax/West 6th.

ANTELOPE VALLEY TRANSIT AUTHORITY

The Antelope Valley Transit Authority, based in the Lancaster and Palmdale area within Los Angeles County's Antelope Valley, provides commuter bus service from Lancaster and Palmdale into Los Angeles. Route 786 (Century City/West Los Angeles) provides four runs from Lancaster and Palmdale into Los Angeles during the morning commute time period, and four runs from Los Angeles to Palmdale and Lancaster during the evening commute time period. The closest stop to the project site is located at Wilshire/La Cienega to the west.

EXISTING BUS STOPS

The Transportation Assessment identifies existing bus stops in the transportation study area. Bus stops are provided in regular succession along Wilshire Boulevard. The closest bus stop to the project site is located at the northwest corner of the Curson Avenue/Wilshire Boulevard intersection, on the north side of Wilshire Boulevard 65 feet west of the intersection. This stop serves Metro Route 20 and LADOT DASH Fairfax service. Passenger amenities consist of a bench, trash can, and shade structure, as well as nearby wayfinding for Hancock Park. Bus stop amenities along Wilshire Boulevard in the transportation study area generally include benches, trash cans, and enhanced crosswalks, but lack shelters, pedestrian-oriented wayfinding, and pedestrian-oriented lighting.

FUTURE HEAVY RAIL SERVICE

Metro's D Line subway (also known as the Purple Line) is under construction to extend service west along Wilshire Boulevard, with service eventually connecting to the University of California, Los Angeles (UCLA) campus. The project includes tunnels within the Wilshire Boulevard right-of-way, adjacent to the project site. When completed, the D Line would operate peak service as often as every 6 minutes in both directions. Trains may operate 24 hours a day, 7 days a week. The first phase of the D Line extension, which is slated to open in 2024, would include a new stop at Ogden Drive and Wilshire Boulevard (branded as the Wilshire/Fairfax stop). This subway stop would be located directly to the southeast of the project site and would be accessible via sidewalks and crosswalks along Wilshire Boulevard. In addition, Metro's Purple (D Line) Extension First Last Mile Plan includes recommendations to enhance bus stops along Wilshire Boulevard.

5.13.1.4 Bicycle and Pedestrian Facilities

Bicycle and pedestrian facilities are provided within the transportation study area and offer additional options for travel to and from the project site.

Bikeways are categorized into four types, as described below:

- **Class I Bikeway (Bike Path):** Also known as a shared path or multi-use path, a bike path is a paved right-of-way for bicycle travel that is completely separate from any street or highway (e.g., along a creek or channel).
- **Class II Bikeway (Bike Lane):** A striped and stenciled lane for one-way bicycle travel on a street or highway. This facility could include a buffered space between the bike lane and vehicle lane (referred to as a buffered bike lane) and the bike lane could be adjacent to on-street parking.

- **Class III Bikeway (Bike Route):** A signed route along a street where the bicyclist shares the right-of-way with motor vehicles. This facility can also be augmented using shared-lane markings (also known as “sharrows”). An enhanced bike route, known as a bicycle boulevard, can include traffic-calming treatments to slow down vehicles.
- **Class IV Bikeway (Separated Bike Lane):** Also known as a cycle track or a protected bike lane, this is a bikeway for the exclusive use of bicycles including a separation between the bikeway and the through vehicular traffic. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking. A cycle track can be one-way or two-way.

There is currently one bikeway in the transportation study area: parking-adjacent Class II bike lanes on Hauser Boulevard north of West 6th Street. There are several bike racks at the project site, on the same block as the project site, or within a short distance of the project site:

- four inverted-U bike racks on the north side of Wilshire Boulevard between Curson Avenue and Fairfax Avenue;
- three inverted-U bike racks on the south side of Wilshire Boulevard between Stanley Avenue and Curson Avenue; and
- two post-and-ring bike racks on the east side of Curson Avenue north of Wilshire Boulevard.

The sidewalk network on the project site’s block and adjacent streets is complete with a mixture of curb-tight and buffered sidewalks around the site. All signalized intersections that touch a portion of the project site’s block have a complete set of crosswalks, except for the south leg of the Fairfax Avenue/West 6th Street intersection, where pedestrian crossing is prohibited. There is a midblock crossing with a continental crosswalk and a pedestrian hybrid beacon on West 6th Avenue between Ogden Drive and Curson Avenue that aligns with an existing entrance to the project site on the south side of the road. There is also a signalized midblock pedestrian crossing with a continental crosswalk on Wilshire Boulevard west of Fairfax Avenue. The sidewalk network is built out in this area of Los Angeles, including adjacent to the immediate site area. Crosswalks in the transportation study area are generally high-visibility continental crosswalks. However, all four crosswalks at the Curson Avenue/Wilshire Boulevard intersection are standard crosswalks. High-visibility curb ramps with tactile domes are provided at some (but not all) crosswalks in the transportation study area.

Details on bicycle and pedestrian trips within the transportation study area are provided in the Traffic Assessment (see Appendix J).

5.13.2 Regulatory Setting

This section provides a summary of federal, state, regional and local regulations, plans, and policies that are applicable and provide regulatory context for consideration of the project. Compliance with the codes and regulations in this section is required. The consistency analysis for the plans and policies that are necessary in a CEQA transportation analysis is provided in Section 5.13.5, TRA Impact 1. In addition, refer to Section 5.10, Land Use and Planning, for additional discussion of the project’s consistency with City and County transportation plans and policies.

5.13.2.1 Federal

AMERICANS WITH DISABILITIES ACT OF 1990

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

5.13.2.2 State

ASSEMBLY BILL 32 AND SENATE BILL 375

With the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32. On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB’s Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, are updated every 8 years in conjunction with the revision schedule of housing and transportation elements. Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target. Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within 3 years. Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit oriented developments also qualify if they: 1) are at least 50% residential; 2) meet density requirements; and 3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences. Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission. Regional transportation planning agencies, Cities, and Counties are encouraged, but not required, to use travel demand models consistent with the California Transportation Commission guidelines.

CALIFORNIA VEHICLE CODE

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

COMPLETE STREETS ACT

AB 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires Cities and Counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires Cities and Counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, and transit riders, as well as motorists. At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

CONGESTION MANAGEMENT PROGRAM

The Congestion Management Program (CMP) is a State-mandated program enacted by the State legislature and was last updated in 2010 (Metro 2010). The program is intended to address the impact of local growth on the regional transportation system. Level of Service (LOS) is a qualitative measure used to describe traffic flow conditions, which range from excellent, nearly free-flow, traffic conditions at LOS A to stop-and-go traffic conditions at LOS F. Statutory requirements of the CMP include monitoring 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 Los Angeles County Metropolitan Transportation Authority (Metro), the local CMP agency, has established a countywide approach to implement the statutory requirements of the CMP. This approach includes designating a highway network that includes all State highways and principal arterials within the county and monitoring traffic conditions on the designated transportation network; performance measures to evaluate current and future system performance; promotion of alternative transportation methods; analysis of the impact of land use decisions on the transportation network; and mitigation to reduce impacts on the network. If LOS standards deteriorate in areas outside of infill opportunity zones, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

The CMP requires an EIR to evaluate traffic and public transit impact analyses for select regional facilities based on the quantity of project traffic expected to use those facilities. The CMP guidelines state that areas selected for analysis should be those that include the following locations:

- All CMP arterial monitoring intersections, including monitored on- or off-ramp intersections, where the project would add 50 or more trips during either the a.m. or p.m. weekday peak hours of adjacent street traffic; and
- Mainline freeway monitoring locations where the project would add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hours.

SENATE BILL 743

On September 27, 2013, SB 743 was signed into law. SB 743 started a process that could fundamentally change transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. SB 743 required the Governor’s Office of Planning and Research to propose revisions to the State CEQA Guidelines establishing new criteria to “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099(b)(1)).

The new State CEQA Guidelines Section 15064.3(b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the State CEQA Guidelines shift the focus of CEQA transportation analyses from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses (which in turn reduces regional vehicle trips). Vehicle miles traveled (VMT) is a measure of the total number of miles driven to or from a development and can be expressed in either total VMT or as an average per person.

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

STATEWIDE TRANSPORTATION IMPROVEMENT PROGRAM

Caltrans administers transportation programming, which is the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. Caltrans commits expected revenues over a multi-year period to transportation projects. The Statewide Transportation Improvement Program (STIP) is a multiyear capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other sources.

5.13.2.3 Regional

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS 2020–2045 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG’s prior 2016–2040 RTP/SCS to balance future mobility and housing needs with economic, environmental, and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas, which include High-

quality Transit Areas, Transit Priority Areas, job centers, Neighborhood Mobility Areas, and Livable Corridors. These areas account for 4% of SCAG’s total land area but the majority of directed growth. High-quality Transit Areas are corridor-focused Priority Growth Areas within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. Transit Priority Areas are Priority Growth Areas that are within 0.5 mile of a major transit stop that is existing or planned.

5.13.2.4 County of Los Angeles

COUNTY OF LOS ANGELES GENERAL PLAN

The Mobility Element, included as Chapter 7 of the Los Angeles County General Plan 2035 (County of Los Angeles 2015), provides an overview of the transportation infrastructure and strategies for developing an efficient and multimodal transportation network. The Mobility Element assesses the challenges and constraints of the County transportation system and offers policy guidance to reach the County’s long-term mobility goals. It includes two sub-elements, the Highway Plan and the Bicycle Master Plan. These plans establish policies for the roadway and bikeway systems in the unincorporated areas, which are coordinated with the networks in the 88 cities in the County. The General Plan also established a program to prepare community pedestrian plans, with guidelines and standards to promote walkability and connectivity throughout the unincorporated areas. The County’s General Plan Mobility Element is included here for informational purposes only.

LOS ANGELES COUNTY PUBLIC WORKS TRANSPORTATION IMPACT ANALYSIS GUIDELINES

The County published Transportation Impact Guidelines in July 2020 (County Department of Public Works 2020). Generally, these guidelines provide direction for the preparation of transportation impact analyses for development and transportation projects, including requirements and methodologies for VMT analyses. During the Transportation Assessment preparation process, the City and the County agreed that it would be most appropriate to use the City’s assessment guidelines rather than the County’s. This is primarily because the project would most affect the transportation network in the city.

5.13.2.5 City of Los Angeles

While the project site is located within the city of Los Angeles, it is owned by the County of Los Angeles and is proposed for uses that benefit the public. Accordingly, the project is not subject to the regulatory controls of the City of Los Angeles. However, the street system surrounding the project site is entirely within the City’s jurisdiction. As such, the transportation analysis was prepared pursuant to the LADOT Transportation Assessment Guidelines, which require consistency analysis with the following plans, policies, and ordinances, including the City of Los Angeles Mobility Plan 2035 and the Los Angeles Municipal Code (LAMC).

CITY OF LOS ANGELES MOBILITY PLAN 2035

The Mobility Plan 2035, adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the City’s General Plan Transportation Element. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates “complete streets” principles, and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act.

The purpose of the Mobility Plan is to present a guide to the future development of a citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City's transportation network, it complements other components of the City General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities: Safety First; World Class Infrastructure; Access for All Angelenos; Collaboration, Communication, and Informed Choices; and Clean Environments and Healthy Communities.

CITY OF LOS ANGELES MUNICIPAL CODE

Regarding construction traffic, LAMC Section 41.40 limits construction activities to the hours from 7:00 a.m. to 9:00 p.m. on weekdays and from 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays. No construction is permitted on Sundays.

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued therefore, on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

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

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

LOS ANGELES DEPARTMENT OF TRANSPORTATION: TRANSPORTATION ASSESSMENT GUIDELINES

On July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model, and transportation impact thresholds based on VMT, pursuant to State CEQA Guidelines Section 15064.3 and the 2019 CEQA updates that implement SB 743. The City established the Transportation Assessment Guidelines (TAG) that include both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility Plan.

Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.

5.13.3 Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant impact related to transportation and traffic if it would:

- a) Conflict with a project plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- b) Conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b);
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- d) Result in inadequate emergency access.

5.13.4 Impact Assessment Methodology

As described in the Transportation Assessment prepared by Kittelson and Associates (see Appendix J), impact assessment methodologies for each threshold of significance were developed in accordance with Section 2 of the LADOT TAG (LADOT 2020).

In order to support the assessment of projects' consistency with the City's transportation planning framework, the City has prepared a Plan Consistency Worksheet with questions to help guide whether the project would conflict with these programs, plans, ordinances, and policies. The Transportation Assessment prepared a Consistency Worksheet which considered the Mobility Plan 2035 Public Right-of-Way (PROW) Classification Standards for Dedications and Improvements, the Mobility Plan 2035 PROW Policy Alignment with Project-Initiated Changes, network access, and other applicable TDM and regional planning policies.

To consider the project's consistency with State CEQA Guidelines Section 15064.3, an off-model VMT analysis using visitor zip code data was used to conduct a full VMT impact analysis. This approach is appropriate because the project is a non-standard use with unique trip generation patterns and neither the City's VMT calculator tool nor the City's Travel Demand Forecasting model could be used for the assessment. To conduct this analysis, average recreation trip lengths from the 2012 California Household Travel Survey were used; the California Household Travel Survey provides zip code-based household data including mode choice and trip lengths. Information is further broken down by trip purpose (home, work, school, errands, dining, shopping, and recreation). The average recreation trip length would be obtained for the zip codes encompassing Los Angeles and Orange Counties. From there, the average trip length for museum visitors in fiscal year 2018 was estimated using visitor's reported zip codes. This would be estimated for visitors from zip codes within Los Angeles and Orange Counties, since they are more likely to make a unique, unlinked driving trip to the museum. The visitors' average trip lengths were then compared to the average trip length for recreation-related trips in the region. To determine impacts, the analysis considers the net increase in total VMT, since trips associated with uses such as event centers and regional-serving entertainment venues are typically discretionary trips made by individuals, which

may be substitute or new trips, based on LADOT traffic study guidelines. The analysis compares the visitor trip length to the average regional recreation trip length to see which is longer. If zip code-based trips are longer than the regional average, then the regional total VMT would increase, thus causing a potential impact. Additional information on the development of the methodology for the VMT impact analysis is provided in the Transportation Assessment prepared by Kittelson and Associates (see Appendix J). The determination of significance regarding the potential for increasing hazards was assessed based on the relative amount of pedestrian activity at project access points, design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the project site, the type of bicycle facilities the project driveway(s) crosses and the relative level of use, the physical conditions of the project site and surrounding areas, and other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

Analysis of the project’s potential impacts related to emergency access included a review of vehicle access points to the project site. Construction activities and their impact on emergency access have also been evaluated. The determination of significance for this threshold considers the potential of the project to impede on emergency access on adjacent City streets and/or result in safety impacts.

For impacts during project operation, project trip generation is detailed in the Transportation Assessment prepared by Kittelson and Associates (see Appendix J). Operational trip generation for the project was prepared by first establishing an existing trip generation rate for the weekday daily, weekday a.m. peak hour, weekday midday peak hour, weekday p.m. peak hour, Saturday daily, and Saturday midday peak hour periods using historical data specific to the project site and the existing museum square footage and number of employees. Then, the trip generation rates were applied to the proposed increase in museum square footage to estimate the net increase in project-generated trips. Trip generation was estimated separately for employees and for visitors. All trips presented are one-way.

Table 5.13-4 provides the estimated net increase in vehicle trips generated by the project during project operation,¹ combining the net increases for both employee and visitor vehicle trips. The project is expected to generate 1,293 net new weekday daily vehicle trips and 1,679 net new Saturday daily vehicle trips.

Table 5.13-4. Net Vehicle Trip Generation Estimate

Weekday									
Daily	AM Peak Hour			Midday Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
1,293	12	0	12	107	199	306	16	69	85
Saturday									
Daily	AM Peak Hour			Midday Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
1,679	<i>(not analyzed)</i>			145	139	284	<i>(not analyzed)</i>		

Source: Kittelson and Associates (2022).

¹ The Traffic Assessment uses the term “museum expansion” to represent the action of the project, as the proposed increase in square footage was used to estimate the increase in project-generated trips. Throughout this EIR, all actions associated with project implementation are referred to collectively as “the project.” For the purposes of this transportation analysis, these two terms are synonymous given the aforementioned methodology for projecting project-generated trips.

The George C. Page Museum (Page Museum) is one of several museums in the transportation study area. It is expected that a portion of visitors to the transportation study area would visit multiple museums in a single visit. This includes the additional visitors to the area due to the project; a portion of the increase in visitors could come from other nearby museums such as LACMA. Therefore, the trip generation used in the Transportation Assessment is conservative by linearly estimating the net increase in trips associated with the project.

5.13.5 Environmental Impact Analysis

The consistency analysis of the applicable transportation plans, policies, and regulations for threshold a) and threshold b) considers the holistic impacts associated with implementation of the project (i.e., it does not provide separate construction and operation analyses). This is because most policies broadly consider the appropriateness of types of land uses and the inclusion of features in the development plan that are consistent with the agency's long-range vision and goals. For threshold c), the focus is on the design features of the project so the question is inherently focused on how the project would function once fully constructed. Construction and operational impacts are addressed for threshold d).

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

MOBILITY PLAN 2035 PROW CLASSIFICATION STANDARDS FOR DEDICATIONS AND IMPROVEMENTS

While the project includes new construction along Wilshire Boulevard (an Avenue I) and West 6th Street (an Avenue II), the property is not zoned for R3 or less restrictive zoning. Therefore, the project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions.

MOBILITY PLAN 2035 PROW POLICY ALIGNMENT WITH PROJECT-INITIATED CHANGES

Given that the project includes physically modifying the curb placement along Curson Avenue, City plans and policies were reviewed in light of the proposed physical changes to determine if the City would be obstructed from carrying out the plans and policies. Curson Avenue along the project frontage is not on the High Injury Network. It is not a part of one of the designated multimodal networks. There are no existing or planned transit lines, transit stops, or bikeways along this segment. With the proposed change, the existing sidewalk would be maintained. The project proposes to modify the curb line to create a bay for a section of curb that is already designated as a bus zone, in place of the existing landscaped area. This moves loading/unloading out of the travel lanes to separate it from the adjacent travel lane.

The project also includes a new driveway on West 6th Street (an Avenue II). However, this does not result in exceeding 1 driveway per every 200 feet along the Avenue II frontage, locating it within 150 feet of the intersecting street, or locating it near a mid-block crosswalk. The project would not conflict with plans or policies that govern the public right-of-way.

NETWORK ACCESS

The project does not propose to vacate or otherwise restrict public access to a street, alley, or public stairway. It does not create a cul-de-sac and is not located adjacent to an existing cul-de-sac. Therefore, the project would not conflict with a plan or policies that ensures access for all modes of travel.

PARKING SUPPLY AND TRANSPORTATION DEMAND MANAGEMENT

The project would not propose a supply of on-site parking that exceeds the baseline amount as required in the LAMC. No increase in the on-site parking supply is anticipated from existing conditions, and the overall museum square footage is increasing. The project would not conflict with parking management policies.

The LAMC bicycle parking requirements for institutional uses are one short-term parking space per 10,000 of floor area, and one long-term parking space per 5,000 square feet of floor area. Since the project includes a net increase of 42,000 square feet, this means that four short-term spaces and eight long-term spaces are required. At this time, the project site plan is conceptual and therefore does not indicate the amount nor location of bike parking. Therefore, the project may conflict with the LAMC requirements for bicycle parking.

The TDM Ordinance requires projects between 25,000 and 50,000 square feet to provide a transportation information display with public transit information, contact information for rideshare and transit, ridesharing promotional material, bike route and facility information, and listing of on-site services or facilities. At the time of EIR development, the project site plan is conceptual and does not indicate the location of this required TDM measure. Therefore, the project may conflict with the LAMC requirements for TDM.

CONSISTENCY WITH REGIONAL PLANS

The project was reviewed to determine potential inconsistencies with GHG reduction targets forecasted in the SCAG RTP/SCS. The project was analyzed using a total VMT threshold (as opposed to an efficiency-based impact threshold). The project site functions as a regional attraction and the proposed project would result in a net increase in regional VMT. Since the project would result in a net increase in VMT, further evaluation was necessary to determine whether this project would be inconsistent with VMT and GHG reduction goals of the SCAG RTP/SCS.

It was determined that without mitigation measures, the project may be inconsistent with SCAG's goals related to improving mobility and accessibility, ensuring safety, maximizing transportation productivity, encouraging active transportation, and improving air quality. The project does not include transportation improvements to encourage and improve active transportation and public transit outside of on-site access and circulation improvements. The project may conflict with the following relevant RTP/SCS goals:

- Improve mobility, accessibility, reliability, and travel safety for people and goods
- Enhance the preservation, security, and resilience of the regional transportation system
- Increase person and goods movement and travel choices within the transportation system
- Reduce greenhouse gas emissions and improve air quality
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel

CONCLUSION

Through the analysis above, it was determined that the project would be inconsistent with regional plans related to mobility and GHG reductions, as well as the LAMC requirements for bicycle parking and TDM. As such, the project could result in a *significant impact* related to consistency with plans, programs, ordinances, or policies.

TRA Impact 1	
<p>The project could result in a significant impact related to consistency with transportation plans, programs, ordinances, or policies.</p> <p>(CEQA Checklist Appendix G Threshold XVII a)</p>	
Mitigation Measures	
<p>TRA/mm-1.1</p>	<p><i>In consultation with the LADOT, the Los Angeles County Museum of Natural History Foundation (Foundation) shall prepare and implement a Transportation Demand Management (TDM) Program to reduce museum employee and visitor vehicle trips and increase alternative modes such as walking, bicycling, public transit, and rideshare.</i></p> <p><i>The Foundation shall designate an existing member of staff as the on-site TDM Coordinator. This coordinator shall be responsible for monitoring and tracking employee and visitor mode share and annual reporting to LADOT.</i></p> <p><u>Employee Strategies:</u></p> <p><i>Information shall be distributed to employees and displayed on a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The following measures may be applied to reduce employee vehicle trips and VMT:</i></p> <ul style="list-style-type: none"> • <i>Provide a transportation information bulletin board on-site with public transit information, contact information for rideshare and transit, ridesharing promotional material, bike route and facility information, and listing of on-site services or facilities.</i> • <i>Provide facilities on-site to support bicycling to work, such as secure bike parking, showers, and lockers.</i> • <i>Encourage and support participation in Metro vanpool, including subsidies for participation.</i> • <i>Implement paid parking for employees.</i> • <i>Subsidize transit passes.</i> • <i>Offer flexible work schedules and telecommuting, when feasible.</i> <p><u>Visitor Strategies:</u></p> <p><i>Transportation information for visitors shall be displayed on La Brea Tar Pits' website and distributed with physical marketing materials. The following measures may be applied to reduce visitor vehicle trips and VMT:</i></p> <ul style="list-style-type: none"> • <i>Advertise and offer discounted museum tickets for visitors who use public transit or a bicycle to visit the project.</i> • <i>Provide and maintain secure on-site bicycle parking for visitors and monitor usage to determine if additional bicycle racks are needed.</i> <ul style="list-style-type: none"> ○ <i>Provide wayfinding signage directing bicyclists from the visitor entrances to where on-site bicycle parking is located.</i> ○ <i>Ensure bicycle parking is well lit and monitored by staff.</i> • <i>Continue to have paid parking for visitors.</i> • <i>Coordinate with Metro to improve transit access and user comfort and encourage visitors to take local bus service or the future Purple Line extension to La Brea Tar Pits, through the following measures:</i> <ul style="list-style-type: none"> ○ <i>Improve pedestrian wayfinding between the planned Purple Line station, local bus stops, and La Brea Tar Pits.</i>

TRA Impact 1	
	<ul style="list-style-type: none"> ○ Implement bus stop improvements such as shelters along Wilshire Boulevard bus stops that would be used by La Brea Tar Pits visitors. ○ Coordinate with Metro and the City of Los Angeles to ensure that safe and comfortable pedestrian facilities (such as ADA curb ramps and continental crosswalks) are available between local bus stops and the project entrances, including at the Curson Avenue/ Wilshire Boulevard intersection. • Coordinate with the City of Los Angeles to implement planned bikeways in the vicinity of the project site and contribute to the implementation of the bikeways. This includes planned bikeways along Wilshire Boulevard and West 6th Street.
Impacts Following Mitigation	
With implementation of Mitigation Measure TRA/mm-1.1, impacts related to consistency with plans, programs, ordinances, or policies would be reduced to less than significant.	

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

The California Household Travel Survey average trip lengths by trip purpose for households in Los Angeles County and Orange County indicate the average recreation trip length is 6.65 miles. Ticketing information and reported zip codes (for visitors from Los Angeles County and Orange County zip codes) from fiscal year 2018 were used to estimate the average visitor trip length. According to this subset of fiscal year 2018 visitors, the average trip length per visitor was 19.70 miles.

The average visitor trip length (19.70 miles) is higher than the average recreation trip length (6.65 miles). Visitors to the museum travel approximately 196% longer than the average recreation trip in Los Angeles and Orange Counties. Given that museum visitor trips are longer than regional recreation trip lengths, additional visitor trips to the project site due to the proposed project would result in a net increase in total VMT.

The Page Museum is one of several museums in the transportation study area. It is expected that a portion of visitors to the transportation study area would visit multiple museums in a single visit. This includes the additional visitors to the area due to the project; a portion of the increase in visitors could come from other nearby museums such as LACMA. Therefore, the VMT assessment used for the impact findings under TRA Impact 1 and TRA Impact 2 is conservative in that it assumes new visitors generated by the project would exhibit the same trip length patterns as existing visitors to the project site.

According to the California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA 2022), the maximum VMT reductions for various categories of on- and off-site measures range from approximately 2% to 65% for projects located in urban areas. However, given the magnitude of VMT that would need to be reduced—due to visitor trips being 196% longer than average regional recreation trips—Mitigation Measure TRA/mm-1.1 may be insufficient to reduce VMT to less-than-significant levels. Therefore, the project would result in a substantial increase in vehicle miles traveled and would be considered a *significant* impact.

TRA Impact 2
The project would result in a net increase in VMT and would result in a substantial increase in vehicle miles traveled. Impacts would be considered significant. (CEQA Checklist Appendix G Threshold XVII b)
Mitigation Measures
Implement Mitigation Measure TRA/mm-1.1.
Impacts Following Mitigation
Although implementation of TRA/mm-1.1 would reduce employee and visitor VMT and support multimodal connectivity, it may be insufficient to reduce VMT to less-than-significant levels. Therefore, the project's impacts related to causing substantial vehicle miles traveled would remain significant and unavoidable.

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

Once developed, the project would include a new driveway on West 6th Street that is 20 feet wide and consists of one inbound and one outbound lane. The driveway would be located approximately 450 feet west of the intersection with Curson Avenue and 250 east of the signalized pedestrian crossing. The driveway location does not result in exceeding 1 driveway per every 200 feet along the Avenue II frontage, locating it within 150 feet of the intersecting street, or locating it near a mid-block crosswalk. West 6th Street has relatively flat grades and there are no visible obstructions to sight distance for the proposed location. West 6th Street has an existing two-way left-turn lane for approximately 200 feet in each direction of the proposed driveway, with only one driveway on the north side which provides access to parking for the Park La Brea apartments. To minimize potential conflicts, the project driveway would be aligned across from the existing driveway on the north side of West 6th Street.

Pedestrian activity is high on West 6th Street and there is a sidewalk with landscaped separation between the curb and the sidewalk where the driveway would be located. Bicycle activity is moderate on West 6th Street and currently shares the roadway with vehicles, but there are planned protected bike lanes. Introduction of a new driveway would create a new conflict point between vehicles and pedestrians/bicyclists but would be designed to provide adequate sight distance and with curb radii that require slower speeds to complete turning movements.

A new loading zone is proposed along West 6th Street between the LACMA parking access and the signalized mid-block crossing connecting to the project site. The loading zone would replace existing on-street parking and would operate similar to the existing parking when considering whether the project would cause potential hazards.

The project also includes modifying the curb along Curson Avenue to provide a pull-out area for loading and unloading. The project proposes to modify the curb line to create a bay for a section of curb that is already designated as a bus zone. This moves loading/unloading out of the travel lanes to separate it from the adjacent travel lane.

Based on the proposed site plan and evaluation of geometric design and uses, the project would result in *less than significant* impacts when considering increasing hazards during project operation.

TRA Impact 3
Once developed, the project would not substantially increase hazards due to a geometric design feature; impacts would be less than significant. (CEQA Checklist Appendix G Threshold XVII c)
Mitigation Measures
<i>No mitigation is required.</i>
Impacts Following Mitigation
<i>Not applicable. Impacts related to hazards due to a geometric design feature would be less than significant.</i>

d) Would the project result in inadequate emergency access?

CONSTRUCTION

Construction of the project would include renovation and expansion of the existing museum, demolition of the existing museum entrances, grading and excavation, and construction of new structures and related infrastructure. While all construction activities, including construction staging of equipment, would be situated entirely within the project site, it is possible that project construction and needs for unique construction-period access could cause temporary delays to vehicles (including emergency response providers) in the vicinity of the project site.

OPERATION

Once the project is constructed and operational, emergency vehicle access to the project site would be provided from the two site entrances off South Curson Avenue and off West 6th Street. As stated in the Transportation Assessment, the project may result in queuing and delays at the two major intersections directly next to (and providing access to) the project site, which could affect emergency access to the project site and other nearby sites.

The project would be required to be designed in accordance with the California Vehicle Code (CVC), which provides requirements for ensuring emergency vehicle access regardless of traffic conditions. In addition, the project’s emergency vehicle access would need to comply with Los Angeles Fire Department (LAFD) access requirements as to not impede emergency access within the project vicinity, and all project driveways would be required to be designed according to LADOT standards to ensure adequate access, including emergency access, to the project site. While increased vehicle traffic may increase delays and queues on the network, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel, activating emergency vehicle pre-emption phases on traffic signals, or driving in the lanes of opposing traffic. Pertaining to emergency access within the project site, a Preliminary Basis of Design Narrative was prepared for the project to outline the applicable codes related to fire safety and access features required to ensure adequate on-site circulation and access to the buildings and park areas within the project site (Code Consultants, Inc. [CCI] 2021). As outlined by CCI, the project would be designed in accordance with regulations set forth in the County of Los Angeles Building Code as well as the City of Los Angeles Fire Code as they pertain to fire safety and emergency access.

CONCLUSION

Given the project is undergoing continued development, the specific emergency access design and parameters have not been finalized, either for construction-period or post-construction conditions. For these reasons, emergency access impacts are considered *potentially significant*.

TRA Impact 4	
<p>The project could result in inadequate emergency access during construction and operation. Project impacts would be potentially significant.</p> <p>(CEQA Checklist Appendix G Threshold XVII d)</p>	
Mitigation Measures	
<p><i>TRA/mm-4.1</i></p>	<p><i>A construction traffic management plan (CTMP) shall be developed by the contractor, approved by the County and the City of Los Angeles Department of Transportation (LADOT), and implemented to alleviate construction period impacts. The CTMP will include, but may not be limited to, the following restrictions:</i></p> <ul style="list-style-type: none"> • <i>Prohibition of construction worker parking on nearby residential streets.</i> • <i>Prohibition of construction-related vehicles parking or staging on surrounding public streets.</i> • <i>Temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways.</i> • <i>Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.</i> • <i>Scheduling of construction-related deliveries, haul trips, etc., shall occur outside the commuter peak hours to the extent feasible.</i>
<p><i>TRA/mm-4.2</i></p>	<p><i>Consultation shall occur with the City of Los Angeles Fire Department (LAFD) to analyze the project's emergency access design, including a review of the proposed vehicle access points. Construction activities and their impact on emergency access shall also be reviewed to ensure that the final design provides adequate access to the project site and neighboring businesses and residences.</i></p>
<p><i>TRA/mm-4.3</i></p>	<p><i>To improve emergency access safety and circulation, coordination shall occur with LADOT to explore the feasibility of implementing one or more of the following improvements:</i></p> <ul style="list-style-type: none"> • <i>Signal timing at the built-out intersection of Curson Avenue/Wilshire Boulevard shall be regularly updated to optimize traffic signal timing. In addition, the weekday a.m. and p.m. peak period bus-only lanes on Wilshire Boulevard shall be extended to the weekday midday and weekend midday peak hours to improve bus operations through that intersection.</i> • <i>Signal timing at the Curson Avenue/West 6th Street intersection shall be regularly updated to optimize splits. In addition, improve existing lane striping to extend the northbound left-turn lane at the intersection, and/or add an inbound left-turn lane at the project's Curson Avenue driveway.</i> • <i>Incorporate safety features to accommodate passenger pick-up and drop-off along West 6th Street when planned separated bike lanes are implemented.</i> • <i>Monitor driveway operations at Curson Avenue.</i>

TRA Impact 4	
	<i>The County of Los Angeles does not have the authority to impose these measures because they are within the discretionally authority of the City of Los Angeles. Thus, while they are recommended, the County of Los Angeles is not required to implement them. However, the requirement to coordinate with the City and facilitate possible implementation of the above measures shall be required.</i>
Impacts Following Mitigation	
<i>Impacts related to inadequate emergency access would be less than significant with mitigation. Emergency access can be addressed and brought to a level of less-than-significant solely with the implementation of TRA/mm-4.1 and 4.2. However, the exploration and facilitation of the improvements identified in TRA/mm-4.3, which are under the City of Los Angeles jurisdiction, are recommended to further advance and improve transportation conditions in the project site.</i>	

5.13.6 Cumulative Impact Analysis

In accordance with the LADOT Transportation Assessment Guidelines, this cumulative analysis analyzes the effects of the project in relation to other developments in proximity of the project site that are proposed, approved, or under construction. The LADOT TAG define related projects as those that are within a 0.5-mile radius from a project site for CEQA analysis, and 0.25 mile beyond the farthest study intersection for non-CEQA circulation analysis² (LADOT 2020).

Estimated trip generation for the nine cumulative projects included in the Transportation Assessment is provided in Table 5.13-5. More information on how the trip generation for the cumulative projects was developed is provided in the Transportation Assessment. The trip generation for the cumulative projects is conservative by not applying negative net new trips and instead assuming those to be zero. Accordingly, a hyphen in a cell of the table denotes that the related project generates either zero or negative net new trips for that specific time period and inbound/outbound trip generation.

Table 5.13-5. Related Projects Trip Generation

Project	Week-day Daily	Weekday a.m.			Weekday Midday			Weekday p.m.			Sat. Daily	Saturday Midday		
		In	Out	Total	In	Out	Total	In	Out	Total		In	Out	Total
LACMA Renovation	668	43	2	45	27	33	60	15	53	68	763	34	41	75
Mixed-Use Project	310	4	14	18	11	7	18	14	9	23	209	9	6	15
Wilshire Curson Project	17,576	1,692	261	1,953	378	1,283	1,661	491	1,666	2,157	8,176	319	1,083	1,402
Mixed-Use Residential Project	786	27	46	73	36	24	60	48	31	79	913	31	20	51

² The cumulative project list provided in Chapter 4, Environmental Setting, includes an expanded list beyond the geographic requirements of the LADOT Transportation Assessment Guidelines to allow consideration of potential cumulative impacts related to other environmental issue areas with a broader geographic reach.

Project	Week-day Daily	Weekday a.m.			Weekday Midday			Weekday p.m.			Sat. Daily	Saturday Midday		
		In	Out	Total	In	Out	Total	In	Out	Total		In	Out	Total
Mixed-Use Residential and Commercial Development	--	--	41	41	1	--	--	1	--	--	--	1	--	--
Olympic and Fairfax Mixed Use Project	--	--	12	--	3	2	5	3	3	6	--	2	2	4
Mixed-Use Project	1,609	49	93	142	51	16	67	66	21	87	762	43	14	57
San Vicente Medical/Commercial Project	5,374	364	108	472	141	304	445	183	395	578	2,146	119	257	376
Olympic Boulevard Mixed-Use Project	99	6	3	9	4	--	4	5	--	5	30	3	--	3

Source: (Kittelson and Associates (2022).

Note: A hyphen (-) denotes that the related project does not generate net new trips for that time period and/or direction.

The analysis conducted for consistency with transportation plans and policies to determine if cumulative impacts may result from the project in combination with related projects in the transportation study area is as follows:

- Mobility Plan 2035 PROW Classification Standards for Dedications and Improvements:** The LACMA Renovation is a related project that shares the block as well as West 6th Street and Wilshire Boulevard frontages with the project. However, while the LACMA Renovation also includes new construction along Wilshire Boulevard (an Avenue I) and West 6th Street (an Avenue II), the property is not zoned for R3 or less restrictive zoning. Therefore, cumulative conflicts are not anticipated.
- Mobility Plan 2035 PROW Policy Alignment with Project-Initiated Changes:** Related projects in the transportation study area do not propose curb modifications and new driveways near the project. Therefore, cumulative conflicts are not anticipated.
- Network Access:** The related projects in the transportation study area do not propose to vacate or restrict public access or create cul-de-sacs in proximity of the project. Therefore, cumulative conflicts are not anticipated.
- Parking Supply and Transportation Demand Management:** It is not anticipated that related projects in the transportation study area would conflict with the City’s parking management policies (either through providing sufficient parking supply or implementing parking management strategies). The potential project shortcomings related to bicycle parking and TDM requirements would be exacerbated by related projects in the transportation study area. Therefore, *cumulative conflicts are anticipated.*
- Consistency with Regional Plans:** The LACMA Renovation, located directly to the west of the project and sharing the city block, is similarly a museum that serves as a regional attraction and would likely result in a net increase in regional VMT. *Therefore, cumulative conflicts with regional plans related to mobility and GHG reductions are anticipated.*

Other projects in the transportation study area are generally residential, office, and retail projects. However, the LACMA renovation, located directly to the west of the project and sharing the city block, is similarly a museum that serves as a regional attraction and would likely result in a net increase in regional VMT. Cumulative increases in VMT are anticipated. Therefore, the project would contribute to a *significant* cumulative impact related to causing substantial vehicle miles traveled and consistency with transportation plans, programs, ordinance, and policies.

The analysis of potential increased hazards was reviewed to determine if cumulative impacts may result from the project in combination with related projects in the transportation study area. Related projects in the area would likely contribute additional vehicle, pedestrian, and bicycle activity. The project design would not be impacted by the related projects nor the increase in activity. Thus, the project would result in a *less than significant* cumulative impact when considering increasing hazards based on the geometric design and uses of the project.

TRA Impact 5
The project would result in a significant contribution to cumulative transportation impacts by resulting in a net increase in VMT.
Mitigation Measures
<i>Implementation of TRA/mm-1.1 shall be required.</i>
Impacts Following Mitigation
<i>Although implementation of TRA/mm-1.1 would reduce employee and visitor VMT and support multimodal connectivity, it may be insufficient to reduce VMT to less-than-significant levels. Therefore, the project's cumulative impacts related to causing substantial vehicle miles traveled would remain significant and unavoidable.</i>

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