3.9 Transportation

3.9.1 Section Summary

This section analyzes the potential transportation impacts of Proposed Project construction and operation. The potential impacts analyzed and discussed in this section include **TRAN-1**: Program, Plan, Ordinance, or Policy (PPOP) Conflict, and **TRAN-2**: Vehicle Miles Traveled (VMT). Impacts **TRAN-3**: Geometric Hazards, and **TRAN-4**: Emergency Access, were analyzed in the Initial Study (IS)/Notice of Preparation (NOP) and found to have no impact and a less-than-significant impact, respectively. Therefore, Impacts **TRAN-3** and **TRAN-4** will not be addressed further in the Subsequent Environmental Impact Report (SEIR).

Section 3.9, *Transportation*, includes the following:

- A description of the environmental transportation setting in the Proposed Project vicinity, including the street system and bicycle and pedestrian facilities;
- A description of regulations and policies regarding transportation that are applicable to the Proposed Project;
- A discussion of the methodology used to determine whether a transportation impact exists;
- An impact analysis of the Proposed Project; and
- A description of mitigation measures proposed to reduce significant impacts, as applicable.

Key Points of Section 3.9, *Transportation*, include the following:

- The construction and operation of the Proposed Project would result in a less-than-significant transportation impact under TRAN-1.
- The operation of the Proposed Project also would result in a significant impact to **TRAN-2**: VMT, due to its potential to increase net regional VMT. This impact has no feasible mitigation measures that would reduce the impact to a less-than-significant level and is thus significant and unavoidable.

3.9.2 Introduction

This section describes the environmental setting (i.e., existing conditions and regulatory setting) for transportation related to the Proposed Project, the impacts on transportation that would result from the Proposed Project, and mitigation measures that could reduce these impacts.

3.9.3 Environmental Setting

This section discusses the existing conditions relating to transportation in the study area, as well as federal, state, and local regulations relating to transportation that would apply to the Proposed Project. Within the context of existing roadway, pedestrian/bicycle and transit facilities used to access the Proposed Project site, the study area is defined as that area bounded by Gaffey Street to the west,

Harbor Boulevard to the east, the SR-47 ramps to the north, and 14th to the south. In the context of VMT, the study area is defined as all travel associated with the studied venues (e.g. the Greek). This can best be described as a radius of travel around the Project Site. An average trip length of 16.6 miles was used in the calculation of Proposed Project VMT, and could therefore be used to describe the VMT study area (though note that it is an average, so some trips will be longer, some will be shorter). Consistent with the City of Los Angeles TAG requirements, employee VMT is analyzed at the Area Planning Commission boundary, in this case the Harbor Area Planning Commission (City of Los Angeles Area Planning Commission Harbor APC). The assessment of conditions relevant to this study includes roadway, transit, rail, and nonmotorized infrastructure.

Street System

Primary regional access to the study area is provided by the Harbor Freeway (Interstate [I-] 110), northwest of the Proposed Project Site, and by the Vincent Thomas Bridge and Seaside Avenue (State Route [SR-] 47) northeast of the Proposed Project Site. Access to the Project Site from I-110 is provided via the freeway terminus at Gaffey Street or ramps at Harbor Boulevard. From SR-47, the Project Site can be accessed via ramps on Harbor Boulevard. Local access to the Project Site is provided by a grid of arterial and collector roads. The primary roadway facilities in the study area are as follows.

- **Gaffey Street** is classified by the City of Los Angeles (City) as a Boulevard II north of 9th Street and a Modified Avenue II south of 9th Street. Gaffey Street serves north–south access to the study area and provides a connection for local and regional travel from San Pedro to other parts of Los Angeles and the South Bay region. Gaffey Street is also a major commercial corridor within San Pedro.
- **Pacific Avenue** is classified as a Modified Avenue II that provides north–south access within San Pedro. It is a major commercial corridor within San Pedro, consisting of strip-commercial structures, auto-repair facilities, and restaurants. The roadway's northern terminus is at Channel Street, where the roadway continues as John S. Gibson Boulevard. Its southern terminus is at the Pacific Ocean, where it intersects with Shepard Street and Bluff Place.
- **Harbor Boulevard**, which forms the western edge of the Project Site, is classified as an Avenue I and provides north–south access along the eastern side of the community of San Pedro before continuing as Front Street north of Regan Street, as John S. Gibson Boulevard north of Pacific Avenue, and as Miner Street south of Crescent Avenue.
- **7th Street** is classified as an Avenue II between Weymouth Avenue and Harbor Boulevard, providing east–west access through the central portion of the community of San Pedro. This roadway begins just east of Western Avenue and terminates at Harbor Boulevard.
- **9th Street** is classified as a Modified Avenue III between Western Avenue and Pacific Avenue, providing east–west access through the central portion of the community of San Pedro. Between Pacific Avenue and Beacon Street, 9th Street is classified as a Local Street. This roadway begins west of Western Avenue and terminates at Beacon Street, one block west of Harbor Boulevard.

Freight rail activity related to the former Westways Terminal at Berth 71 no longer occurs in the vicinity of the Project Site, and the Southern Pacific Railroad (SPRR) Railyard that was located along

the eastern side of Harbor Boulevard and west of Sampson Way is no longer operational. This track was previously shared by the Waterfront Red Car Line, which is also not currently operational.

Pedestrian and bicycle facilities comprise the existing nonmotorized mobility features. Pedestrian facilities include sidewalks, crosswalks, and pedestrian signals. Sidewalks are provided along existing major roadway facilities in the study area, with the exception of Sampson Way, south of the Project Site.

- **Harbor Boulevard** includes a Class II bicycle lane (i.e., lanes on roadways designated for use by bicycles through striping, pavement legends, and signs) between Seaside Freeway and the Main Driveway of the proposed West Harbor Lot. This bicycle path continues as Front Street north of Seaside Freeway.
- **Miner Street** includes a Class II bicycle lane between Harbor Boulevard and its southern terminus at Berth 46.
- **9th Street** is classified as a Class III bicycle route between Western Avenue and Beacon Street. This bicycle route begins west of Western Avenue and terminates at Beacon Street, one block west of Harbor Boulevard.
- **14th Street** includes a Class II bicycle lane between Pacific Avenue and Beacon Street.

An existing pedestrian promenade extends south from the Harbor Freeway, along the eastern side of the existing rail lines to 6th Street. Pedestrian crossings and signals are located at most major roadway intersections. Class II bike lanes are provided on Harbor Boulevard from Front Street to 22nd Street.

3.9.4 Regulatory Setting

Federal, state, regional, and local regulations related to transportation are described in the following section. Consistent with the Los Angeles Department of Transportation's (LADOT) *Transportation Assessment Guidelines* (TAG) (LADOT 2022), full plans, policies, and program-consistency evaluation is included in Appendix G of this report.

3.9.4.1 State and Regional Regulations

Senate Bill 743, Transportation Impacts

To further the state's commitment to the goals of Senate Bill 375 and Assembly Bills 32 and 1358, Governor Brown signed Senate Bill 743 on September 27, 2013. Senate Bill 743 adds Chapter 2.7, *Modernization of Transportation Analysis for Transit-Oriented Infill Projects*, to Division 13 (§ 21099) of the Public Resources Code. Key provisions of Senate Bill 743 include eliminating the measurement of vehicle delay (i.e., level of service [LOS]) as a metric that can be used for measuring traffic impacts. Under Senate Bill 743, the focus of transportation analysis shifts from LOS to the reduction of greenhouse gas (GHG) emissions through the creation of multimodal transportation networks and promotion of a mix of land uses to reduce VMT. Senate Bill 743 required the Governor's Office of Planning and Research (OPR) to amend the California Environmental Quality Act (CEQA) Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly for areas served by transit, such as transit priority areas (TPAs), those alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation

networks, and a diversity of land uses" (Public Resources Code § 21099[b][1]). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." OPR also has discretion to develop alternative criteria for areas that are not served by transit, if appropriate.

Pursuant to the mandate in Senate Bill 743, OPR adopted the revised CEQA Guidelines in December 2018, recommending the use of VMT for analyzing transportation impacts under CEQA. In turn, Section 15064.3, which states "generally, vehicle miles traveled is the most appropriate measure of transportation impacts," was added to the CEQA Guidelines. In accordance with this requirement, CEQA Guidelines Section 15064.3(a), adopted in December 2018, states that "a project's effect on automobile delay does not constitute a significant environmental impact." The requirements of Senate Bill 743 went into full effect as of July 1, 2020.

Southern California Association of Governments Regional Transportation Plan

The Southern California Association of Governments (SCAG) is the designated Metropolitan Planning Organization (MPO) for six southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial) and is federally mandated to develop plans for regional transportation, land-use and growth management, and air quality. The County of Los Angeles (County) is one of many local and regional jurisdictions comprising SCAG. The *Regional Transportation Plan* (RTP) (SCAG 2020) *Regional Comprehensive Plan* (RCP) (SCAG 2008), and *Compass Growth Vision Report* (SCAG 2004) identify the transportation priorities for the southern California region. The policies and goals of the RTP, RCP, and *Compass Growth Vision Report* focus on the need to coordinate land-use and transportation decisions to manage travel demand.

SCAG updates its long-range (i.e., minimum 20-year) RTP/Sustainable Communities Strategy (SCS) every 4 years, per federal (23 U.S. Code Amended §§ 134 *et seq*.) and state (Senate Bill 375) law. SCAG's 2024–2050 RTP/SCS *Connect SoCal* (SCAG 2024 RTP/SCS) (SCAG 2020) was adopted in April 2024.

The SCS is a required element of the RTP that provides a plan for meeting GHG-emissions reduction targets set forth by the California Air Resources Board (CARB). The SCS provides growth forecasts that are used in the development of air quality-related land-use and transportation-control strategies by the South Coast Air Quality Management District (SCAQMD).

Chapter 3.3 of the SCAG 2024 RTP/SCS includes regional planning policies, including 31 mobility policies, and the Proposed Project was reviewed for consistency with each of them.

2021 Los Angeles County Goods Movement Strategic Plan

The *Goods Movement Strategic Plan* (Los Angeles Metropolitan Transportation Authority, 2021) identifies challenges and defines a roadmap for goods movement in the County in the context of mobility, competitiveness, equity, and air quality. The Plan outlines five initiatives for improving the goods-movement process within these contexts, including equity for goods movement, the Los Angeles County Metropolitan Transportation Authority's (LA Metro) Countywide Clean Truck Initiative, southern California rail-investment partnership, urban freight delivery, and logistics workforce and competency. Within this plan, many arterial roadways across the County are recognized as being part of the Countywide Strategic Truck Arterial Network, including Harbor

Boulevard and Miner Street. The designation is used for the recognition of inequitably affected communities surrounding the network.

3.9.4.2 Local Regulations

The following local regulations are taken directly from Attachment D.1, *City Plan, Policies and Guidelines, LADOT TAG* (LADOT 2022). Full local regulations are included in Appendix G to this report.

- The *Transportation Element* of the City's General Plan, *Mobility Plan 2035* (LADCP 2016), established the *Complete Streets Design Guide* (City of Los Angeles 2015) as the City's document for guiding the operation and design of streets and other public rights-of-way (ROWs). The *Transportation Element* lays out a vision for designing safer, more-vibrant streets that are accessible to people, no matter what their mode choice. As a living document, it is intended to be frequently updated as City departments identify and implement street standards and experiment with different configurations to promote complete streets. The guide is meant to be a toolkit that provides numerous examples of what is possible in the public ROW and guidance about context-sensitive design.
- The Project Site is within Planning Area 1 (San Pedro) of the Port of Los Angeles's (Port) *Port Master Plan* (PMP) (Port 2018), which establishes policies and guidelines to direct the future development of the Port. Goal 4 of the PMP, *Increase Public Access to the Waterfront*, is directly relevant to transportation.
- The *Plan for A Healthy Los Angeles* (LADCP 2021) includes policies directing several City departments to develop plans that promote active transportation and safety.
- The City's 35 Community Plans, which the City's *General Plan* (City of Los Angeles 1970) – *Land Use Element* (City of Los Angeles 2018) comprises, guide the physical development of neighborhoods by establishing the goals and policies for land use. The Community Plans provide specific, neighborhood-level detail for land uses and the transportation network, relevant policies, and implementation strategies necessary to achieve *General Plan* and community-specific objectives.
- The stated goal of *Vision Zero Los Angeles* (LADOT 2017) is to eliminate traffic-related deaths in Los Angeles by 2025 through several strategies, including modifying the design of streets to increase the safety of vulnerable road users. Extensive crash-data analysis is conducted on an ongoing basis to prioritize intersections and corridors for implementation of projects that will have the greatest effect on overall fatality reduction. The City designs and deploys Vision Zero Corridor Plans as part of the implementation of Vision Zero. If a project were proposed whose site lies on the High Injury Network, then the applicant should consult with LADOT to inform the project's site plan and to determine appropriate improvements, whether by funding their implementation in full or by making a contribution toward their implementation.
- The *Citywide Design Guidelines* (Los Angeles Department of City Planning Urban Design Studio 2019) include sections relevant to development projects where improvements are proposed within the public realm. Specifically, Guidelines One through Three provide building-design strategies that support the pedestrian experience. The Guidelines provide best practices in designing that apply in three spatial categories of site planning, building design, and public ROW. The

Guidelines should be followed to ensure that the project design supports pedestrian safety, access, and comfort as people move to and from the building and the immediate public ROW.

- The City's Transportation Demand Management (TDM) Ordinance (Los Angeles Municipal Code [LAMC] 12.26.J) requires certain projects to incorporate strategies that reduce drive-alone vehicle trips and improve access to destinations and services. The ordinance is revised and updated periodically and should be reviewed for application to specific projects as they are reviewed.
- LAMC Section 12.37, *Waivers of Dedication and Improvement*, requires certain projects to dedicate and/or implement improvements within the public ROW to meet the street-designation standards of the *Mobility Plan 2035* (LADCP 2016).
- The City Bureau of Engineering's *Street Standard Dimensions S-470-1* (BOE DPW 2015) provides the specific street widths and public ROW dimensions associated with the City's street standards.
- LADOT's TAG (LADOT 2022) establishes the criteria and requirements for project assessment and review in the City regarding transportation impacts.
- 2009 Mitigation Measures (Port 2009)

Transportation impacts under CEQA as of 2022 differ from those defined when the *2009 San Pedro Waterfront (SPW) Environmental Impact Statement (EIS)/Environmental Impact Report (EIR)* (2009 SPW EIS/EIR) was released (Port 2009). Thus, the findings and subsequent mitigation measures identified in the 2009 SPW EIS/EIR are not directly relevant to the Proposed Project described in this report. However, the mitigation measures of the 2009 SPW EIS/EIR are included herein for informational purposes.

During the preparation and release of the 2009 SPW EIS/EIR, VMT was not considered for potential transportation impacts under CEQA. VMT was first implemented in 2020, following the passage of Senate Bill 743 in 2013. Prior to Senate Bill 743, LOS was used to assess vehicle-delay impacts. LOS is no longer a transportation impact criterion under CEQA, and any effects of the Proposed Project on LOS are not considered impacts and thus require no mitigation. The following mitigation measures were identified in the 2009 SPW EIS/EIR; those that have been implemented as of September 2023 are identified as such.

- **MM-TC-1**: Develop and implement a Traffic Control Plan throughout Proposed Project construction *(implemented).*
- **MM-TC-2**: Prohibit weekday peak-period parking on Gaffey Street.
- **MM-TC-3**: Modify southbound (SB) approach to Gaffey Street and 9th Street.
- **MM-TC-4**: Install traffic signal at Gaffey Street and 6th Street.
- **MM-TC-5**: Modify northbound (NB) and SB approaches at Miner Street and 22nd Street.
- **MM-TC-6**: Prohibit parking on Harbor Boulevard.
- **MM-TC-7**: Modify Harbor Boulevard at 6th Street.
- **MM-TC-8**: Modify Harbor Boulevard at 5th Street.

- **MM-TC-9**: Modify Harbor Boulevard at 1st Street.
- **MM-TC-10**: Modify eastbound (EB) approach to Harbor Boulevard and 7th Street *(implemented)*.
- **MM-TC-11**: Reconfigure Harbor Boulevard and Swinford Street/SR-47 EB ramps.
- **MM-TC-12**: Reconfigure Harbor Boulevard at O'Farrell Street.
- **MM-TC-13**: Install signal at Harbor Boulevard and 3rd Street.
- **MM-TC-14**: Modify EB and westbound (WB) approaches at Gaffey Street and 13th Street.
- **MM-TC-15a**: Offset loss of parking through reconfiguration or expansion of parking elsewhere in the vicinity.
- **MM-TC-15b**: Design the southern portion of this extension to minimize disruption to the existing parking lots.
- **MM-TC-15c**: Align the southern segment of the Cabrillo Beach extension behind the Cabrillo Marine Aquarium to avoid or minimize conflicts with the existing parking lots in the area.
- **MM-TC-16**: Install a signal at the intersection of Harbor Boulevard and 3rd Street.
- **MM-TC-17**: Ensure that traffic signals at cross-street locations have protected left-turn phases and, potentially, active "No Right Turn" signs to allow these movements from streets parallel to the tracks to be held when a train is approaching or present.
- **MM-TC-18**: Provide traffic control on approach streets to rail line to prevent motorists from stopping on tracks.
- **MM-TC-19a**: Prohibit left turns across tracks on existing and proposed streets and proposed driveways that cross the tracks.
- **MM-TC-19b**: Reduce streetcar operating speeds along streets where existing and proposed driveways serve the adjacent uses, and install appropriate active warning signs or other devices to alert motorists to the possible presence of oncoming streetcars.
- **MM-TC-20**: Combine lower levels of proposed parking structures to reduce potential conflict points along Sampson Way.
- **MM-TC-21**: Signalize the reconfigured intersection of Signal Street/Sampson Way.
- **MM-TC-22**: Install half-signals at two proposed track crossovers located along Sampson Way and retime signals at the proposed track crossovers on 22nd Street at Miner Street and at Via Cabrillo Marina.
- **MM-TC-23**: Install a half-signal at the proposed track crossover on the City Dock No: 1 extension that would occur south of the proposed Mid-Point Station.
- **MM-TC-24**: Design pavement markings and signage in station areas to clearly direct pedestrians to the desired routes.
- **MM-TC-25**: Construct new sidewalks to allow for the orderly movement of pedestrians.

- **MM-TC-26**: Shift the location of the main Ports O' Call surface parking lot driveway to a point north of this station to improve pedestrian safety there.

3.9.5 Methodology

This section describes the methodology used to assess the transportation impacts of the Proposed Project and its elements during their construction and operation. CEQA Appendix G and the LADOT TAG (LADOT 2022) include similar transportation impacts, defined in this report as **TRAN-1**, **TRAN-2**, **TRAN-3**, and **TRAN-4**. Impact and threshold language, as defined in both CEQA Appendix G (California Natural Resources Agency 2016) and the LADOT TAG (LADOT 2022), is included in Section 3.9.6, *Thresholds of Significance*, of this report.

The baseline condition for transportation impacts is defined as the previously approved project in the *Addendum to the San Pedro Waterfront Project Environmental Impact Statement/Environmental Impact Report for the San Pedro Public Market Project* (2016 SPPM Addendum) (ICF 2016). The 2016 SPPM Addendum included VMT quantities in the Air Quality analysis; however, a baseline of zero has been used for this analysis to be able to present the full extent of possible impacts.

3.9.5.1 TRAN-1: Program, Plan, Ordinance, or Policy Conflict

Project consistency with respect to alterations to the transportation network will be assessed against Program, Plan, Ordinance, or Policy (PPOPs) conflicts identified in the regulatory section of this report. Project consistency is defined as non-preclusion of goals and objectives from PPOPs through development of the Project. If the Proposed Project is determined to conflict with existing PPOPs—i.e., it will impede achievement of existing goals and objectives—the Proposed Project will be found to result in a significant impact. Full PPOPs analysis is included in Appendix G to this report.

3.9.5.2 TRAN-2: Vehicle Miles Traveled

Analysis of conflict with CEQA Guidelines Section 15064.3(b) pertains to the VMT resultant from Proposed Project trips. The methodology for analysis of VMT potential impact depends on Proposed Project land use, location, and size, as defined by the LADOT TAG (LADOT 2022). The threshold of significance defined for the Proposed Project is further described in Section 3.9.6 of this report.

As a regional-serving entertainment and event center, the regional-serving project threshold applies to the Amphitheater component of the Proposed Project. The proposed Ferris wheel and Amusement Attractions component of the Proposed Project is expected to be ancillary to the Amphitheater and the adjacent retail, and as such is not expected to independently generate vehicle trips and VMT. A net increase in VMT is understood to mean a regional increase in VMT, as compared to the baseline condition. As described above, the baseline condition is defined as the previously approved project in the 2016 SPPM Addendum. The 2016 analysis included VMT quantities in the Air Quality analysis; however, a baseline of zero has been used for this analysis to be able to present the full extent of possible impacts.

As a function of trips and trip lengths, regional VMT can increase or decrease because of a project's impact on the overall number of trips or on average trip lengths in the region, as compared to the baseline condition. These impacts are influenced by the project type, scale, location, and relationship

to surrounding land uses. The VMT assessment methodology developed for the Proposed Project includes the estimated average trip length and expected trip generation.

3.9.6 Thresholds of Significance

A project is considered to have a significant transportation impact if it would result in one or more of the following occurrences. Language related to thresholds of significance is included as defined in CEQA Appendix G (California Natural Resources Agency 2016) and the LADOT TAG (LADOT 2022) below. However, because the Los Angeles Harbor Department (LAHD) is the lead agency, the thresholds from the LADOT TAG are used in the impact analysis that follows, unless there are no TAG CEQA thresholds for all of the impact assessment questions contained in CEQA Appendix G:

- **TRAN-1:** Program, Plan, Ordinance, or Policy Conflict
    - **CEQA Appendix G**: Would the Proposed Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- **LADOT TAG**: Conflicting with Plans, Programs, Ordinances, or Policies (Threshold T-1)
- **TRAN-2:** Vehicle Miles Traveled
    - **CEQA Appendix G**: Would the Proposed Project conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?
- **LADOT TAG**: Causing Substantial Vehicle Miles Traveled (Threshold T-2.1)

The LADOT TAG defines VMT thresholds by land use, shown in Table 3.9-1 below.

Table 3.9-1. LADOT Significance Threshold by Land Use

Land Use	Threshold
Residential	15% below the existing average household VMT per capita (9.2 VMT for the Harbor Area Planning Commission)
Office	15% below the existing average employee VMT per employee (12.3 VMT for the Harbor Area Planning Commission)
Regional Serving Projects	Net increase in VMT

Source: LADOT 2022
VMT = vehicle miles traveled.

In addition to the "short-term" or "project-level" VMT effects defined in Table 3.9-1, the LADOT TAG describes *cumulative impacts* of a project, which are based on the project's consistency with development location and intensity described in the SCAG 2024 RTP/SCS. The following sections describe the short-term, project-level, and cumulative VMT impacts of the Proposed Project.

3.9.7 Impact Analysis

3.9.7.1 Summary of 2009 San Pedro Waterfront Environmental Impact Statement/Environmental Impact Report Findings

Transportation impacts under CEQA as of 2022 differ from those defined in both 2009 and 2016, when the 2009 SPW EIS/EIR and 2016 SPPM Addendum were released, respectively. Thus, the findings of the 2009 SPW EIS/EIR and 2016 SPPM Addendum are not directly relevant to the Proposed Project described in this report. However, the impact determinations and associated mitigation measures of the 2009 SPW EIS/EIR and SPPM Addendum are included herein for informational purposes.

During the preparation and release of the 2009 SPW EIS/EIR, VMT was not considered for potential transportation impacts under CEQA. VMT was first implemented in 2020, following the passage of Senate Bill 743 in 2013. Prior to the enactment of Senate Bill 743, LOS was used to assess vehicle-delay impacts. LOS is no longer a transportation impact criterion under CEQA, and any effects of the Proposed Project on LOS are not considered impacts. The following impacts and mitigations were identified in the 2009 SPW EIS/EIR.

- **Impact TC-1**: Construction of the Proposed Project would not result in a short-term, temporary increase in construction-related truck and auto traffic, decreases in roadway capacity, and disruption of vehicular and nonmotorized travel.
    - **MM-TC-1**: *Develop and implement a Traffic Control Plan throughout Proposed Project construction (implemented).*
- **Impact TC-2a**: Proposed Project operations would increase traffic volumes and degrade LOS at intersections within the Proposed Project vicinity.
    - **MM-TC-2**: *Prohibit weekday peak-period parking on Gaffey Street.*
    - **MM-TC-3**: *Modify SB approach to Gaffey Street and 9th Street.*
    - **MM-TC-4**: *Install traffic signal at Gaffey Street and 6th Street.*
    - **MM-TC-5**: *Modify NB and SB approaches at Miner Street and 22nd Street.*
    - **MM-TC-6**: *Prohibit parking on Harbor Boulevard.*
    - **MM-TC-7**: *Modify Harbor Boulevard at 6th Street.*
    - **MM-TC-8**: *Modify Harbor Boulevard at 5th Street.*
    - **MM-TC-9**: *Modify Harbor Boulevard at 1st Street.*
    - **MM-TC-10**: *Modify EB approach to Harbor Boulevard and 7th Street (implemented).*
    - **MM-TC-11**: *Reconfigure Harbor Boulevard and Swinford Street/SR-47 EB ramps.*

  - **MM-TC-12**: *Reconfigure Harbor Boulevard at O'Farrell Street.*
  - **MM-TC-13**: *Install signal at Harbor Boulevard and 3rd Street.*
  - **MM-TC-14**: *Modify EB and WB approaches at Gaffey Street and 13th Street.*
- **Impact TC-2b**: Proposed Project operations would increase traffic volumes and degrade LOS along neighborhood streets within the Proposed Project vicinity.
  - No feasible mitigation is identified.
- **Impact TC-2c**: Proposed Project operations would not increase traffic volumes and degrade operations on Congestion Management Program (CMP) facilities within the Proposed Project vicinity.
  - No mitigation is required.
- **Impact TC-3**: Proposed Project operations would not cause increases in demand for transit service beyond the supply of such services.
  - No mitigation is required.
- **Impact TC-4**: Proposed Project operations would not result in a violation of the City's adopted parking policies, and parking demand would not exceed supply.
  - **MM-TC-15a**: *Offset loss of parking through reconfiguration or expansion of parking elsewhere in the vicinity.*
  - **MM-TC-15b**: *Design the southern portion of this extension to minimize disruption to the existing parking lots.*
  - **MM-TC-15c**: *Align the southern segment of the Cabrillo Beach extension behind the Cabrillo Marine Aquarium to avoid or minimize conflicts with the existing parking lots in the area.*
- **Impact TC-5a**: The alignment of the Waterfront Red Car expansion for the Proposed Project would not increase potential conflict with vehicles at cross streets.
  - **MM-TC-16**: *Install a signal at the intersection of Harbor Boulevard and 3rd Street (identical to MM-TC-13).*
  - **MM-TC-17**: *Ensure that traffic signals at cross street locations have protected left-turn phases and, potentially, active "No Right Turn" signs to allow these movements from streets parallel to the tracks to be held when a train is approaching or present.*
  - **MM-TC-18**: *Provide traffic control on approach streets to rail line to prevent motorists from stopping on tracks.*
  - **MM-TC-19a**: *Prohibit left turns across tracks on existing and proposed streets and proposed driveways that cross the tracks.*

- **MM-TC-19b**: *Reduce streetcar operating speeds along streets where existing and proposed driveways serve the adjacent uses and install appropriate active warning signs or other devices to alert motorists to the possible presence of oncoming streetcars.*

- **MM-TC-20**: *Combine lower levels of proposed parking structures to reduce potential conflict points along Sampson Way.*

- **MM-TC-21**: *Signalize the reconfigured intersection of Signal Street/Sampson Way.*

- **Impact TC-5b**: The alignment of the Waterfront Red Car expansion for the Proposed Project would not increase potential conflict at track crossovers where the rail would transition between center-running and side-running.

  - **MM-TC-22**: *Install half-signals at two proposed track crossovers located along Sampson Way, and retime signals at the proposed track crossovers on 22nd Street at Miner Street and at Via Cabrillo Marina.*

  - **MM-TC-23**: *Install a half-signal at the proposed track crossover on the City Dock No: 1 extension that would occur south of the proposed Mid-Point Station.*

- **Impact TC-5c**: The Waterfront Red Car expansion for the Proposed Project would not result in increased pedestrian conflicts at stations.

  - **MM-TC-24**: *Design pavement markings and signage in station areas to clearly direct pedestrians to the desired routes.*

  - **MM-TC-25**: *Construct new sidewalks to allow for the orderly movement of pedestrians.*

  - **MM-TC-26**: *Shift the location of the main Ports O' Call surface parking lot driveway to a point north of this station to improve pedestrian safety there.*

3.9.7.2 Summary of 2016 and 2019 Addenda Findings

Overall impacts of the SPW Project in the 2016 SPPM Addendum and 2019 *Addendum to the San Pedro Waterfront Project Environmental Impact Report for the San Pedro Public Market Project* (2019 SPPM Addendum) (ICF 2019) (collectively, 2016/2019 SPPM Addenda), including the modified SPPM Project, were determined to be less than those disclosed in the 2009 SPW EIS/EIR. No operational-traffic mitigation measures were required for operation of the SPPM Project. The SPPM Project was determined to not result in new significant impacts, substantially increase the severity of a previously analyzed impact, nor require new mitigation measures that had not already been evaluated in the 2009 SPW EIS/EIR. Therefore, there was no substantial change from the findings in the 2009 SPW EIS/EIR, and the 2016/2019 SPPM Addenda determined that there had been no changes made that would warrant subsequent environmental analysis in accordance with CEQA.

Although no substantial changes from the 2009 SPW EIS/EIR were identified in the 2016/2019 SPPM Addenda, it should be noted that during the preparation and release of the 2016/2019 SPPM Addenda, VMT was not considered for potential transportation impacts under CEQA. VMT was first implemented in 2020, following the passage of Senate Bill 743 in 2013. Prior to Senate Bill 743, LOS

was used to assess vehicle delay impacts. LOS is no longer a transportation impact criterion under CEQA, and any effects of the Proposed Project on LOS are not considered impacts.

Impact TRAN-1: Would the Proposed Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Summary of 2009 San Pedro Waterfront Project Environmental Impact Statement/Environmental Impact Report Findings

PPOP conflict analysis was not required for analysis of transportation impacts when the 2009 SPW EIS/EIR was prepared. Thus, no significant impacts under this criterion were identified.

Summary of 2016 SPPM Addendum to the San Pedro Waterfront Environmental Impact Report for the San Pedro Public Market Project Findings

The 2016 SPPM Addendum found that the SPPM Project would not result in any new significant impacts or a substantial increase in the severity of previously identified impacts that were analyzed in the SPW EIS/EIR. Thus, no significant impacts under this criterion were identified.

Impacts of the Proposed Project

Construction

Given the temporary nature of construction, it is not expected that construction of the Proposed Project would preclude any programs, plans, ordinances, or policies addressing the circulation system, include transit, roadway, bicycle, and pedestrian mobility. Proposed Project construction activities would largely occur within the site and not on public roadways, so access to travel along Harbor Boulevard would not be affected for any users. Sidewalks, bike lanes, and vehicle lanes would remain open. Although CEQA Appendix G considers construction-related impacts, per the LADOT TAG (LADOT 2022), the construction period is considered a non-CEQA analysis, given its temporary nature. Impacts would be less than significant, and no mitigation would be required.

Operation

Operation of the Proposed Project would result in a less-than-significant impact under **TRAN-1**. This determination is described below. Impacts would be less than significant, and no mitigation would be required.

Amphitheater, Ferris Wheel and Amusement Attractions

Operation of the Proposed Project was reviewed against the transportation-related goals, policies, and objectives of the planning documents described in LADOT TAG Attachment D.1 (see Appendix G) and the SCAG 2024 RTP/SCS (see Appendix G). The Proposed Project is not anticipated to conflict with any programs, plans, ordinances, or policies addressing the circulation system, as identified in those plans; thus, the Proposed Project would result in a less-than-significant impact under **TRAN-1**.

Detailed documentation of the Proposed Project's consistency with programs, plans, ordinances, and polices is included in LADOT TAG and the SCAG 2024 RTP/SCS; both of which are included in Appendix G to this report.

208 E. 22nd Street Parking Lot

The proposed plans for 208 E. 22nd Street Parking Lot involve the improvement of an existing parking lot, including the paving of a previously unpaved section of the lot. This lot would serve as overflow parking for the Proposed Project and would not be a trip-generating use in and of itself. It is not anticipated that the improvement of the 208 E. 22nd Street Parking Lot would conflict with any of the programs, plans, ordinances, or policies addressing the circulation system identified in Section 3.9.4, *Regulatory Setting*, resulting in a less-than-significant impact under **TRAN-1**.

New Mitigation Measures Applicable to the Proposed Project

The Proposed Project is anticipated to have a less-than-significant impact under **TRAN-1**; thus, no new mitigation measures would be required.

Impact TRAN-2: Would the Proposed Project conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?

Summary of 2009 San Pedro Waterfront Project Environmental Impact Statement/Environmental Impact Report Findings

During the preparation and release of the 2009 SPW EIS/EIR, VMT was not considered for potential transportation impacts under CEQA. VMT was first implemented in 2020, following the passage of Senate Bill 743 in 2013. Prior to Senate Bill 743, LOS was used to assess vehicle delay impacts. LOS is no longer a transportation impact criterion under CEQA, and any effects of the Proposed Project on LOS are not considered impacts.

Summary of 2016 SPPM Addendum to the San Pedro Waterfront Environmental Impact Report for the San Pedro Public Market Project Findings

As noted above, VMT was first used to assess transportation impacts under CEQA in 2020 and was not a transportation impact criterion when the 2016 SPPM Addendum was prepared.

Impacts of the Proposed Project

Construction

Due to the temporary nature of construction traffic associated with the Proposed Project, a substantial increase in VMT would not be anticipated to result from construction. Given the temporary nature of construction-industry jobs, the relatively large regional construction industry, and the total number of construction workers needed during any Proposed Project construction phase, it is likely that the labor force from within the region would be sufficient to complete the majority of Proposed Project construction without a substantial influx of new workers and their families, and thus would not result

in a substantial increase in VMT. Therefore, construction of the Proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064. Impacts would be less than significant, and no mitigation would be required.

Operation

Operation of the Proposed Project is expected to result in a significant and unavoidable impact to **TRAN-2**. This determination is described below, including discussion for each Proposed Project component. Impacts would be significant and unavoidable.

Amphitheater

The VMT impact analysis is described in the *Catchment Area Analysis* and *Project Vehicle Miles* Traveled Calculation sections below.

Catchment Area Analysis

The Proposed Project is anticipated to be a regionally serving event center. With a capacity of 6,200 guests, the proposed Amphitheater is expected to be of a similar scale as other venues in the region that serve regional audiences. To establish the Proposed Project as a regionally serving event center and estimate anticipated VMT, four comparable venues in southern California were used as samples in a catchment area analysis. The catchment area analysis is intended to establish a general understanding of the geographic market area of the other southern California event venues for transportation analysis purposes. As described below, only the Greek Theater and City National Grove of Anaheim were selected for the Project VMT calculation, based on their similarity to the Proposed Project.

The Port's Goods Movement Division (GMD) and Environmental Management Division (EMD) selected the venues for the catchment area analysis, which are listed below in Table 3.9-2.

Table 3.9-2. Catchment Area Analysis Comparable Venues

Venue	Location	Seating Capacity
The Greek Theater	Los Angeles	5,900
Long Beach Terrace Theater	Long Beach	3,050
Kia Forum	Inglewood	17,505
City National Grove of Anaheim	Anaheim	1,700

Source: Fehr & Peers 2023.

The catchment area analysis utilized StreetLight Data, a big data vendor of travel-pattern information (StreetLight Data 2019; Appendix G) that offers transportation metrics, including volume and origin-destination data. By algorithmically processing trillions of location data points, StreetLight Data provides contextualized, aggregated, and normalized travel pattern data, offering insights into the movement of vehicles, bikes, pedestrians, as well as bus and rail passengers across various road segments and Census Blocks. StreetLight Data's transportation data is collected as Location-Based Services (LBS) data, which rely on the location of mobile devices. This data comprises "low fidelity" cell phone data, anonymized to remove Personally Identifiable Information, and is combined with "high fidelity" Global Positioning System–device data.

The catchment area and VMT analyses were based on an origin-destination data analysis of StreetLight LBS data for all trips beginning or ending at each of the four selected venues at any time of day on their respective event days in 2019. A list of the event days utilized for the StreetLight Data pull for each venue is included in Appendix G to this report. The raw data includes an origin or destination block-group for each trip that began or ended at each venue during the selected days. For each venue, these trips were aggregated to determine the share of trips to or from the venue beginning or ending 0–1 mile, 1–5 miles, 5–10 miles, 10–20 miles, 20–30 miles, 30–40 miles, and more than 40 miles from the venue. An average trip length for each venue was also calculated for the purposes of the VMT analysis, which is further described in the *Project VMT Calculation* section, below. The results of the catchment area analysis are presented in Table 3.9-3 and shown on Figure 3.9-1 through Figure 3.9-4, below.

Table 3.9-3. Catchment Analysis Results

Venue	Sample Size		Trip Distribution (%)							Average Trip Length (miles)
	Number of Event Days	Approximate Number of Devices	0–1 Mile	1–5 Miles	5–10 Miles	10–20 Miles	20–30 Miles	30–40 Miles	40+ Miles	
The Greek Theater	75	12,000	22.3	31.2	16.8	15.5	7.5	3.4	3.5	16.3
Long Beach Terrace Theater	11	1,000	19.3	18.45	18.3	19.9	12.6	6.0	5.6	18.3
Kia Forum	29	15,000	18.5	19.3	20.3	17.9	10.2	5.9	7.9	19.3
City National Grove of Anaheim	52	2,000	12.3	22.9	18.8	21.2	12.8	7.0	5.1	16.9

Source: Fehr & Peers 2023.

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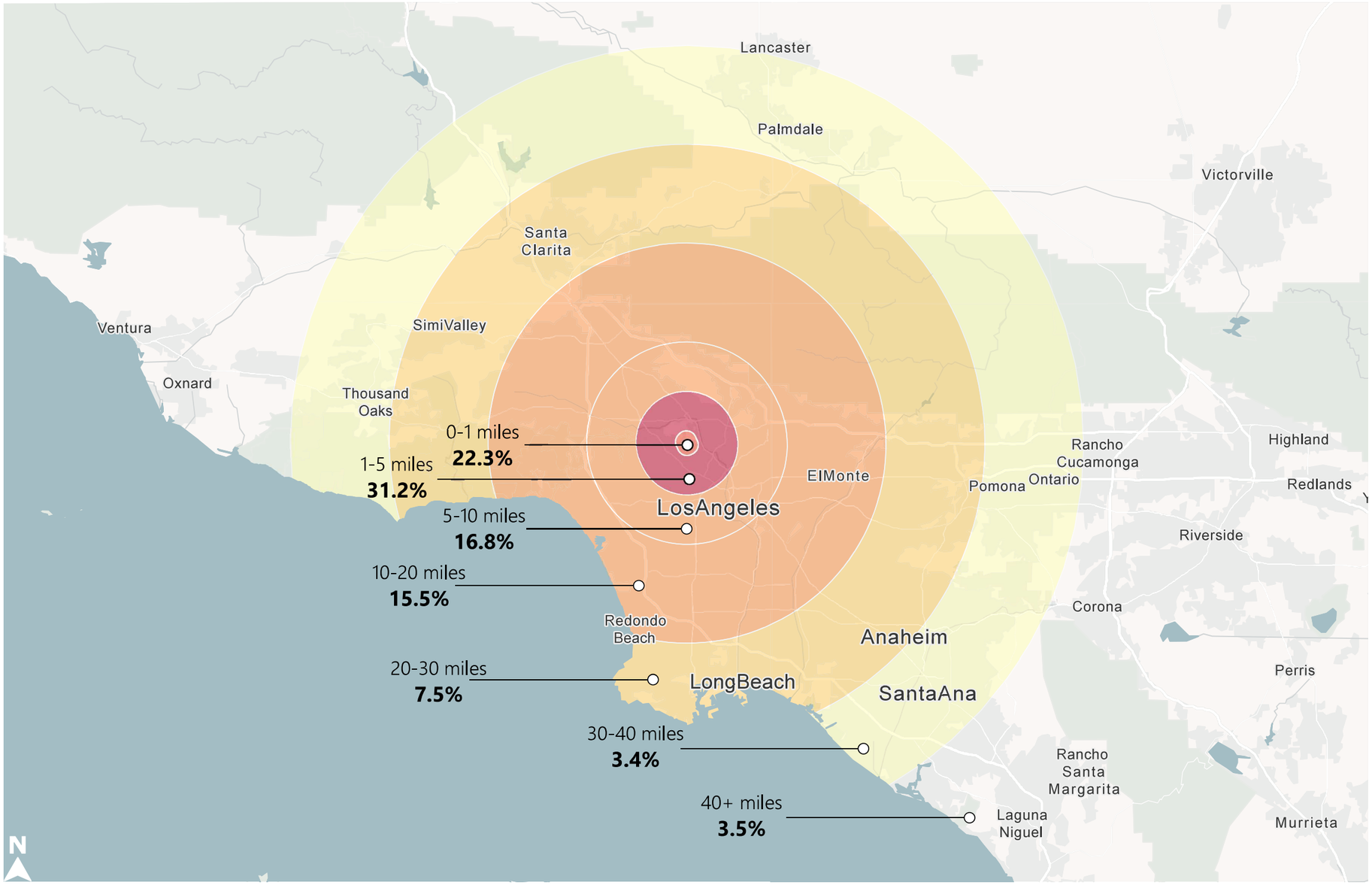

75 Event Days in 2019

Note: distribution is based on a device sample of approximately 12,000

Figure 3.9-1
Greek Theater Catchment Area Analysis
West Harbor Modification Project

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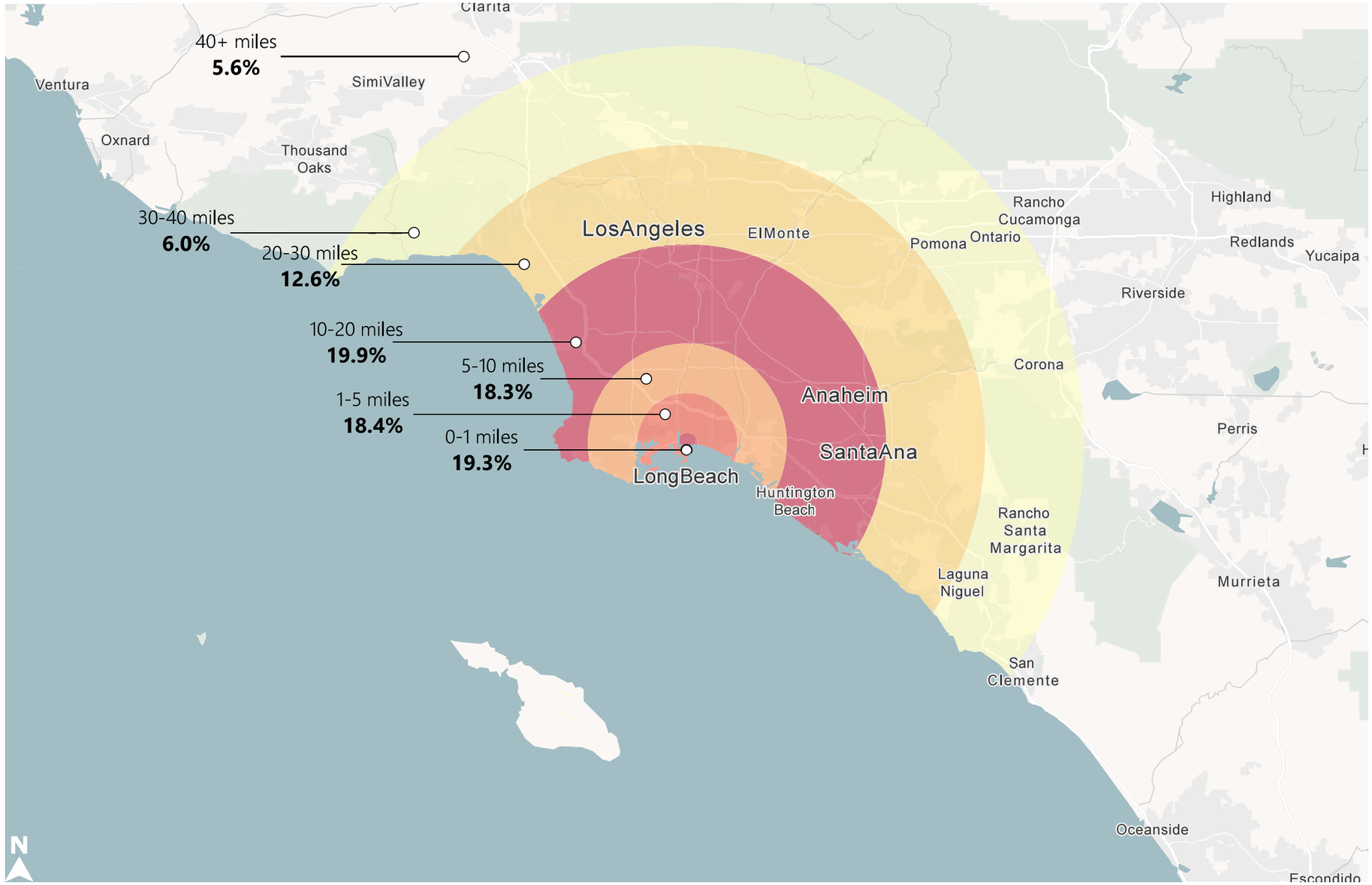

11 Event Days in 2019

Note: distribution is based on a device sample of approximately 1,000

Figure 3.9-2
Long Beach Terrace Theater Catchment Area Analysis
West Harbor Modification Project

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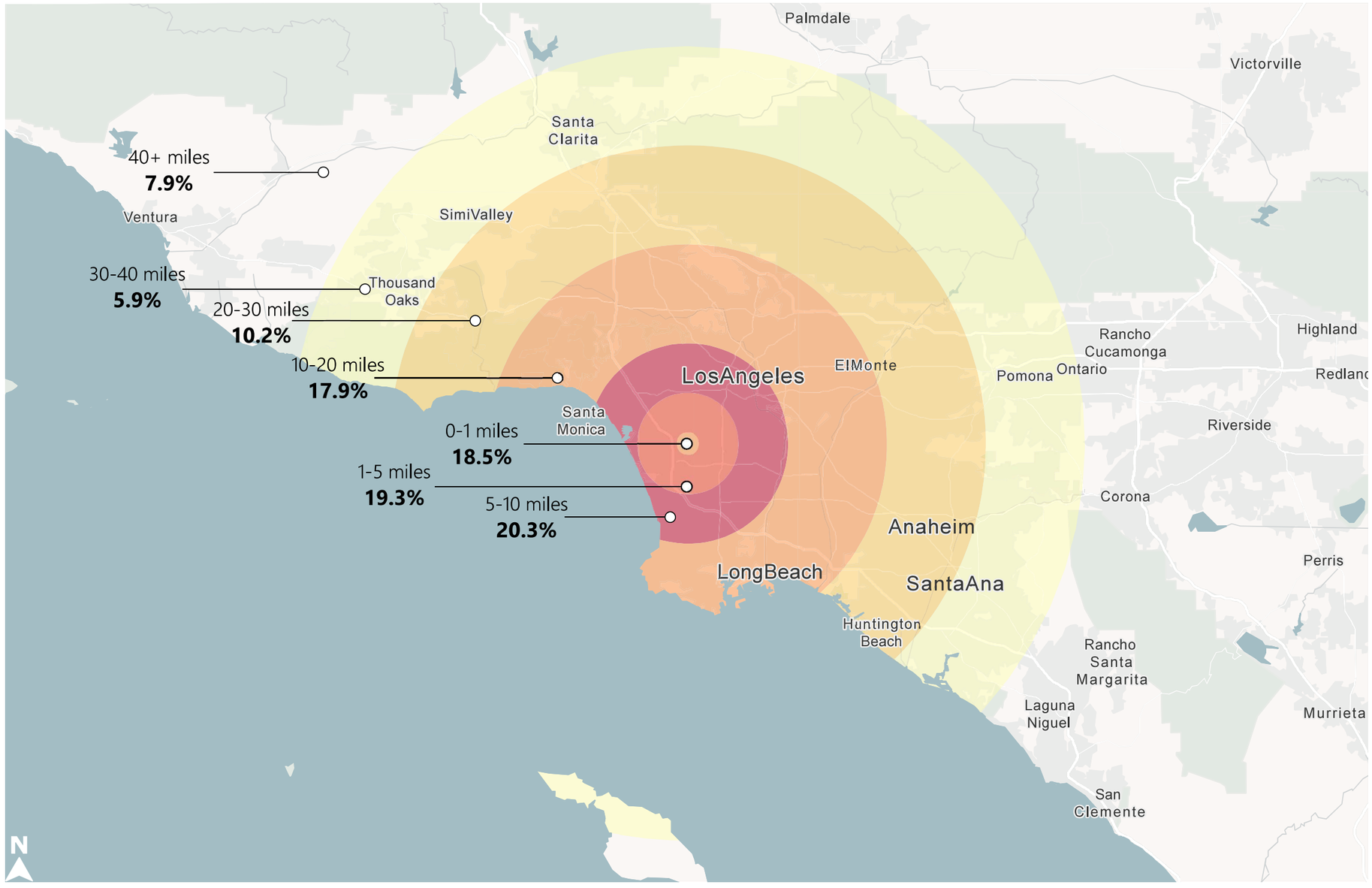

29 Event Days in 2019

Note: distribution is based on a device sample of approximately 15,000

Figure 3.9-3
Kia Forum Catchment Area Analysis
West Harbor Modification Project

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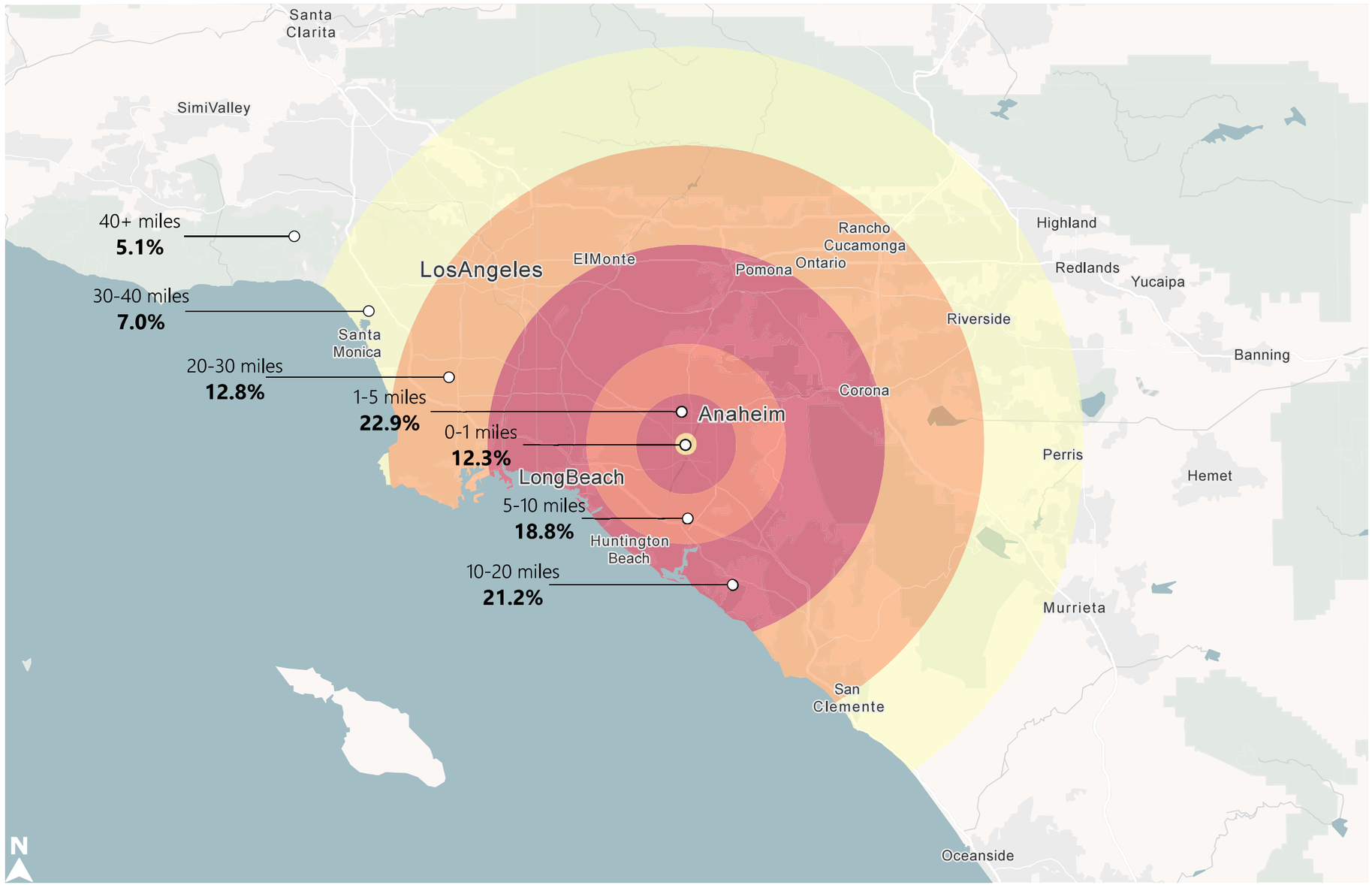

52 Event Days in 2019

Note: distribution is based on a device sample of approximately 2,000

Figure 3.9-4
City National Grove of Anaheim Catchment Area Analysis
West Harbor Modification Project

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Based on the catchment area analysis, it was determined that each of these venues serve regional catchment areas, with a substantial portion of visitors originating 30 or miles away from the venue. Except for the Greek Theater, analysis of all venues showed that more than 10 percent of trips were greater than 30 miles in length; for Long Beach Terrace, a venue half the size of the Proposed Project, 24.2 percent of trips were more than 20 miles in length. As a peer venue, the Proposed Project is likely to serve a similar catchment area to these venues and similarly be classified as a regionally serving event center. It is expected that the Proposed Project would result in a net increase in regionally serving events throughout the year, rather than replacing events that would have otherwise occurred at the comparable venues. Thus, a net increase in regional VMT is expected, which would result in a significant transportation impact. For informational purposes, the estimated VMT that would be generated by the Proposed Project was analyzed and is described in the *Project Vehicle Miles* Traveled Calculation section, below.

For the VMT estimate calculations in the *Project Vehicle Miles* Traveled Calculation section below, the two venues determined to be most similar to the Proposed Project in terms of seating capacity and performance type, the Greek Theater and City National Grove of Anaheim, were selected. The Long Beach Terrace Theater was removed for the Proposed Project VMT calculation because it typically serves recurring Long Beach Symphony events, as opposed to a variety of performances. The Kia Forum was removed for the Proposed Project VMT calculation due to its substantially larger capacity than the Proposed Project.

Project Vehicle Miles Traveled Calculation

Utilizing the raw StreetLight data initially obtained for the catchment area analysis, an average trip distance for each venue was calculated. Because StreetLight Data does not represent attendees versus employees for LBS, the average trip length for each venue is inclusive of both types of visitors.

Table 3.9-4. Average Trip Distance for Catchment Venues

Venue Name	Average Trip Length (miles)
Greek Theater	16.3
City National Grove of Anaheim	16.9
Average	**16.6**

Source: Fehr & Peers 2023.

After determination of the Average Trip Length value (16.6 miles), the following workflow was developed to estimate Proposed Project VMT.

- **Event-Day Person Trips (Occurring in Vehicles):** Capacity estimates were split by type of visitor (i.e., attendees and employees) and mode split for attendees (i.e., 90 percent private vehicle and 10 percent transportation network companies [TNCs], such as Uber or Lyft), based on the Memorandum of Understanding (MOU) prepared by GMD (2023). That MOU is included as Appendix G to this report. The mode split for employees was assumed to be 90-percent private vehicle and 10-percent transit, walk, or bike, also based on assumptions in the Parking Management Plan (Appendix I-1) and the MOU (Appendix I-2).
- **Event-Day Vehicle Trips:** To determine the number of vehicles traveling to the Proposed Project on an event day, Person Trips (Occurring in Vehicles) were divided by Average Vehicle

Occupancy (AVO) rates (LADOT and DCP 2020). This number was then multiplied by 2 to represent both inbound and outbound trips.

- **Event-Day VMT:** Event-Day Vehicle Trips were multiplied by Average Trip Length for attendees and employees, respectively.

    - The Port utilized the average trip length of 9.34 miles for home-based work attraction trips in the Harbor Area Planning Commission) from the LADOT VMT Calculator (LADOT and DCP 2020) for employee trips. LADOT VMT Calculator Trip Length for the Project Site is included in Appendix G to this report.

    - Because the venues analyzed using StreetLight data reflect both employee and event-attendee travel, the attendee average-trip length was increased to 16.9 miles to maintain the blended average-trip length of 16.6 miles across both visitor types. It is not possible to differentiate the travel patterns of these different users from the data gathered for these venues from StreetLight. StreetLight data provide samples of location-based travel data from user cell phones, some of which were likely to be employees, while others were event attendees.

    - A "deadhead" factor was applied to TNC trips to account for "empty" TNC vehicle operation while drivers are searching for or responding to ride requests. This deadhead factor was assumed to be 50 percent (Fehr & Peers 2019).

    - The Event-Day VMT for the Proposed Project was estimated to be 83,296.

Table 3.9-5 below summarizes the VMT estimation for the Amphitheater portion of the Proposed Project.

Table 3.9-5. West Harbor Amphitheater Vehicle Miles Traveled Estimation for Attendees

Group	Capacity[1, 2]	Mode Split[2]	Person Trips (Vehicle)	Average Vehicle Occupancy[2]	Vehicles	Event-Day Trips	Average Trip Length[3, 4]	TNC Deadhead Factor[5]	Event-Day VMT
Private Vehicle	6,200	90%	5,580	2.75	2,030	4,060	16.9	–	68,576
TNC		10%	620	2.75	226	452	16.9	50%	11,452
Employees	175	100%	175	1.00	175	350	9.34	–	3,268
Total	**–**	**–**	**6,375**	**–**	**–**	**4,862**	**–**	**–**	**83,296**

Sources:
[1] Port EMD 2023.
[2] Port GMD 2023.
[3] Fehr & Peers 2023.
[4] Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (LADCP) 2020.
[5] Fehr & Peers 2019.
EMD = Environmental Management Division; GMD = Goods Movement Division; Port = Port of Los Angeles.
TNC = Transportation Network Companies
VMT = Vehicle Miles Traveled

Cumulative Vehicle Miles Traveled Impact

In addition to the Project-level VMT analysis described above, which addresses the short-term VMT impacts of the Proposed Project, LADOT also defines *cumulative impacts* to VMT, which are based on the Project's consistency with the development location and intensity, as described in the SCAG 2024 RTP/SCS.

The SCAG 2024 RTP/SCS defines four types of *Priority Development Areas* (PDAs), which are areas within the region where growth can be strategically located to support SCAG 2024 RTP/SCS goals related to sustainability. The four types of PDAs defined in the SCAG 2024RTP/SCS are Neighborhood Mobility Areas (NMAs), Livable Corridors, TPAs, and Spheres of Influence (SOIs). The SCAG 2024 RTP/SCS includes a regional map showing all NMAs, Livable Corridors, TPAs, and SOIs. Although the central portion of San Pedro is defined as an NMA, the Proposed Project itself is not located within a PDA. However, a project being located within a PDA does not necessarily constitute a significant cumulative impact per the LADOT TAG. The Port incorporated the expected employment of the Proposed Project into its employment forecasts provided to SCAG for inclusion in the SCAG 2024 RTP/SCS. Therefore, the VMT forecasts for the SCAG 2024 RTP/SCS included the employment that would be generated by the Proposed Project. The LADOT TAG indicates that entertainment venues should provide an analysis of cumulative VMT, with the Proposed Project compared with a cumulative "no project" scenario using the SCAG model. This analysis is not needed because the Proposed Project is already incorporated. Thus, although the Proposed Project would result in a significant impact to **TRAN-2** by causing a net increase in regional VMT, it would not result in a cumulative VMT impact.

208 E. 22nd Street Parking Lot

The 208 E. 22nd Street Parking Lot would not constitute a trip-generating use in and of itself; thus, it would not produce trips, but would serve as overflow parking for the Amphitheater and other SPW uses. With up to 2,600 spaces, the 208 E. 22nd Street Parking Lot would be the largest proposed lot intended for Amphitheater visitors.

The 208 E. 22nd Street Parking Lot is located approximately 0.5 mile away from the South (main) Driveway of the Proposed Project. Because the average trip length for the comparable venues described above includes visitors who drove to the venues' designated lots and parked, it can be assumed that the estimated average trip length of 16.6 miles for the Proposed Project is inclusive of this 0.5 mile. Thus, any Proposed Project-related VMT effects of the 208 E. 22nd Street Parking Lot would be associated with the impacts identified in the *Amphitheater* section, above.

Ferris Wheel and Amusement Attractions

The Ferris wheel and Amusement Attractions component of the Proposed Project is expected to be ancillary to the Amphitheater and adjacent retail uses, and, as a result, is not expected to generate new vehicle trips (nor VMT) independent of these other uses, given that visitors to the Amusement Attractions would be visiting other uses of and adjacent to the Proposed Project. Thus, the Ferris wheel and Amusement Attractions would not result in a significant impact on VMT. Additionally, as with the Amphitheater, the expected employment of the Ferris wheel and Amusement Attractions was incorporated into the SCAG 2024 RTP/SCS, and would therefore not result in a significant cumulative VMT impact per the LADOT TAG.

New Mitigation Measures Applicable to the Proposed Project

Mitigation measures for VMT impacts involve the implementation of **MM-TRAN-1**, TDM strategies. The LADOT TAG Attachment G includes quantification of effectiveness of strategies recommended by the City. TDM strategies are typically effective for residential- or office-development projects, which involve regular, predictable commute patterns or mobility behavior. Typical TDM strategies and their quantified effectiveness, including those noted in the LADOT TAG Attachment G, may not be directly applicable to special-event venues, such as the Proposed Project, for the following reasons.

- The Amphitheater would host events of varying sizes throughout the year, making it difficult to operate TDM strategies consistently and effectively.
- Special events are time-limited, lasting only for a few hours. This short duration poses operational and administrative challenges for TDM solutions that require consistent application and behavioral changes over time.
- Unlike commuters or residents, event attendees have a specific, one-time purpose (as opposed to a daily-commute habit) and may be less amenable to behavioral changes associated with TDM, such as using public transportation, carpooling, or alternative-transportation options.
- The timing and schedule of special events is not consistent, which poses challenges to the effective implementation and administration of TDM strategies.
- Transit agencies often run reduced hours or reduced frequency at night and during weekends, when many events would take place, posing challenges to the administration and effectiveness of transit-based TDM strategies.

Considering the challenges listed above, there are no feasible mitigation measures that would fully reduce Proposed Project-related VMT to a less-than-significant impact. However, the TDM mitigation measure **MM-TRAN-1** noted in Table 3.9-6 should be implemented by the Proposed Project Tenant to reduce Proposed Project-related VMT.

Table 3.9-6. MM-TRAN-1 TDM Strategies

Strategy	Description
Transit-Related Mitigation Measures	
Event-Specific Expanded Public Transit Similar to T-25 (CAPCOA 2021)	Coordinate with LA Metro or LADOT to determine the feasibility of expanding services during events, including the feasibility of increasing frequency, network, or service hours.
Event-Ticket Packaging (Valk and Showalter 2003)	Include a link on the Amphitheater website to the LA Metro and LADOT Transit Pass purchase websites.
Traveler Information and Wayfinding (Parisi Transportation Consulting/Mead & Hunt 2022)	Develop and implement event-tailored visitor information to support navigation by transit and improve wayfinding from nearby transit connections prior to the start of Amphitheater operations.
Event-Specific Education and Outreach (Parisi Transportation Consulting/Mead & Hunt 2022)	Develop and implement social media and other marketing and outreach about mass transit and carpooling options for Amphitheater events prior to the start of Amphitheater operations.

Strategy	Description
Carpooling-Related Mitigation Measures	
Carpooling Incentive Program	Develop and implement a carpooling incentive program and transit pass program for Amphitheater employees, with a goal of achieving an average vehicle ridership of 2.0 for Amphitheater employees.
Designate Priority Parking Spaces for Electric and Clean Air Vehicles	Designate parking spaces for Amphitheater guests for electric-vehicle charging and Clean Air Vehicles.
Encourage Use of Satellite Shuttle Service	Encourage Amphitheater guests to use shuttle services from predetermined, offsite parking locations or transit connections (beyond proposed service for the 208 E. 22nd Street Parking Lot), such as those that connect to the Metro J (Silver) Line Bus Rapid Transit line in San Pedro, or the Metro A (Blue) Light Rail line in Downtown Long Beach. Coordinate with LA Metro to determine feasibility of locating a Metro A (Blue) Light Rail line shuttle stop near the Amphitheater.
Carpooling-Application Coordination	Coordinate with existing rideshare/carpooling applications generally available in the marketplace to encourage carpooling to Amphitheater events.
Active Transportation-Related Strategies	
Active Transportation Communication	Share active transportation plans across digital-media channels, such as including website links to the Port's connectivity plan. Additionally, partner with San Pedro's Historic Waterfront Business Improvement District and/or other local parking-lot owners to communicate and direct the public to available public parking lots and transit-related amenities, trolley stops, and other circulation and transit-related options that may become available.
Provide End-of-Trip Bicycle Facilities similar to T-10 (CAPCOA 2021)	Install and maintain end-of-trip bicycle facilities for employees or Amphitheater-event guest use. End-of-trip facilities include bicycle parking and lockers.

Sources: CAPCOA 2021**;** Valk and Showalter 2003**;** Parisi Transportation Consulting/Mead & Hunt 2022
CAPCOA = California Air Pollution Control Officers Association; LADOT = Los Angeles Department of Transportation; LA Metro = Los Angeles County Metropolitan Transportation Authority: MM = Mitigation Measure.

Significance after Mitigation

Because of the operational and administrative inefficiencies and challenges of TDM for special-event venues, as described above, TDM mitigation measures are not expected to reduce the Proposed Project's VMT impact to less-than-significant levels. The Proposed Project would result in a significant and unavoidable transportation impact.

3.9.8 Alternatives Impact Determination

3.9.8.1 Alternative 1 – No Project Alternative

Alternative 1 is defined as the No Project Alternative, where conditions would remain based on the previously approved projects in both the 2009 SPW EIS/EIR and 2016 EIR Addendum. Alternative 1

would not cause significant traffic impacts during the construction phase with implementation of **MM TC-1**, which requires that a traffic control plan be developed. Furthermore, Alternative 1 would not affect any applicable traffic plans or regulations during operations and would follow design guidelines to ensure the implementation of safe design and emergency access. The 2009 SPW EIS/EIR did find significant and unavoidable operational impacts under the LOS methodology, which is no longer used when evaluating impacts to transportation systems. Therefore, Alternative 1 would have less-than-significant impacts regarding transportation.

3.9.8.2 Alternative 2 – Half-Capacity Amphitheater Alternative

Alternative 2 involves construction of an Amphitheater with a similar build to the Proposed Project, but with an anticipated maximum capacity of 3,100 patrons per event. Alternative 2 would not affect any applicable traffic plans or regulations and would follow design guidelines to ensure the implementation of safe design and emergency access. However, similar to the Proposed Project, Alternative 2 would result in significant and unavoidable impacts regarding VMT, even with the implementation of mitigation measures and with a reduction by half in seating capacity. Impacts would be incrementally reduced, but ultimately similar to those of the Proposed Project.

3.9.8.3 Impact Determination and Mitigation Summary

Table 3.9-7. Summary Matrix of Potential Impacts and Mitigation Measures Associated with the Proposed Project

Environmental Impacts	Impact Determination	Mitigation Measures	Impact After Mitigation
Impact TRAN-1: Would the Proposed Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	The 2009 SPW EIS/EIR finding of a less-than-significant impact remains unchanged for the Proposed Project.	No mitigation is required.	No new or substantially more-severe significant impacts would occur.
Impact TRAN-2: Would the Proposed Project conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?	Significant	New **MM-TRAN-1** would apply to the Proposed Project.	Impacts would remain significant with implementation of **MM-TRAN-1**.

CEQA = California Environmental Quality Act; EIR = Environmental Impact Report; EIS = Environmental Impact Statement; MM = mitigation measure; SPW = San Pedro Waterfront

3.9.9 Mitigation Monitoring

As described in Section 3.9.7, *Impact Analysis*, there are no feasible mitigation strategies for reducing the Proposed Project's **TRAN-2** impact to less-than-significant levels. The TDM strategies listed as **MM-TRAN-1** and described in Section 3.9.7 shall be implemented as determined through coordination between the Proposed Project operator and GMD and EMD.

Table 3.9-8. Mitigation Monitoring Program

***MM-TRAN-1: Implementation of Transportation Demand Management (TDM) Strategies*:**

- **Event-Specific Expanded Public Transit:** Coordinate with LA Metro or LADOT to determine the feasibility of expanding services during events, including the feasibility of increasing frequency, network, or service hours.
- **Event-Ticket Packaging:** Include a link on the Amphitheater website to the LA Metro and LADOT Transit Pass purchase websites.
- **Traveler Information and Wayfinding:** Develop and implement event-tailored visitor information to support navigation by transit and improve wayfinding from nearby transit connections prior to the start of Amphitheater operations.
- **Event-Specific Education and Outreach:** Develop and implement social media and other marketing and outreach about mass transit and carpooling options for Amphitheater events prior to the start of Amphitheater operations.
- **Carpooling Incentive Program:** Develop and implement a carpooling incentive program and transit pass program for Amphitheater employees, with a goal of achieving an average vehicle ridership of 2.0 for Amphitheater employees
- **Designate Priority Parking Spaces for Electric and Clean Air Vehicles:** Designate parking spaces for Amphitheater guests for electric-vehicle charging and Clean-Air Vehicles
- **Encourage Use of Satellite Shuttle Service:** Encourage Amphitheater guests to use shuttle services from predetermined, offsite parking locations or transit connections (beyond proposed service for the 208 E. 22nd Street Parking Lot), such as those that connect to the Metro J (Silver) Line Bus Rapid Transit line in San Pedro, or the Metro A (Blue) Light Rail line in Downtown Long Beach. Coordinate with LA Metro to determine feasibility of locating a Metro A (Blue) Light Rail line shuttle stop near the Amphitheater.
- **Carpooling-Application Coordination:** Coordinate with existing rideshare/carpooling applications generally available in the marketplace to encourage carpooling to Amphitheater events.
- **Active Transportation Communication:** Share active transportation plans across digital-media channels, such as including website links to the Port's connectivity plan. Additionally, partner with San Pedro's Historic Waterfront Business Improvement District and/or other local parking-lot owners to communicate and direct the public to available public parking lots and transit-related amenities, trolley stops, and other circulation and transit-related options that may become available.
- **Provide End-of-Trip Bicycle Facilities:** Install and maintain end-of-trip bicycle facilities for employees or Amphitheater-event guest use. End-of-trip facilities include bicycle parking and lockers.

Timing	During operations and events as applicable
Methodology	These strategies will be incorporated into the Tenant's lease. Enforcement will include oversight by the LAHD Environmental Management and Real Estate Divisions. Annual staff reports will be made available to the Board at a regularly scheduled public Board Meeting.

3.9.10 Significant Unavoidable Impacts

As described in Section 3.9.7, above, the Proposed Project would result in a significant and unavoidable transportation impact to VMT (**TRAN-1**).

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