Appendix IV

California Environmental Quality Act Transportation Impact Analysis for the Exposition Park Master Plan Project



DRAFT

MEMORANDUM

TO: Laura Male, Sapphos Environmental
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- **FROM:** Jonathan Chambers, P.E.
- **DATE:** March 17, 2020
- RE: California Environmental Quality Act Transportation Impact Analysis for the Exposition Park Master Plan Project Los Angeles, California

Ref: J1702

This memorandum presents an analysis of potential transportation impacts of the Exposition Park Master Plan (Project) in accordance with Section 15063 of the California Environmental Quality Act (CEQA).

PROJECT DESCRIPTION

The State of California (State) Office of Exposition Park Management (OEPM) proposes a master plan to provide a unified vision for long-term development, growth, and financial and environmental sustainability for Exposition Park in Los Angeles (City).

Exposition Park Today

Exposition Park is a 152-acre State-owned public park bounded by Exposition Boulevard to the north, Figueroa Street to the east, Martin Luther King (MLK), Jr. Boulevard to the south, and Vermont Avenue to the west that is located approximately 3.5 miles southwest of the downtown Los Angeles Civic Center. It is developed with major sports and entertainment venues (the Los Angeles Memorial Coliseum (Coliseum) and Banc of California Stadium), museums (including the California Science Center, Natural History Museum of Los Angeles County, the California African American Museum, and the under-construction Lucas Museum of Narrative Art (Lucas Museum), The Expo Center, the Exposition Park Rose Garden, and other features.

Parking is currently provided at six locations within Exposition Park:

- Visitor Parking Structure (2,131 spaces) on the east side of Exposition Park
- Surface Lots 4, 5, and 6 (1,450 spaces combined) on the south side of Exposition Park
- The Los Angeles Football Club surface lot (245 spaces) south of the Coliseum
- Natural History Museum Structure (118 spaces) on the north side of Exposition Park

- South Parking Structure (975 spaces) on the west side of Exposition Park
- Lucas Museum Parking Structure (1,323 spaces, under construction)

Access to Exposition Park parking is provided primarily from entrances on Figueroa Street (at 39th Street / Christmas Tree Lane), MLK, Jr. Boulevard (at Hoover Street), and Bill Robertson Lane (a public north-south street which runs through Exposition Park west of the Coliseum). There are other minor access points and driveways, some of which are only used during major events. Regional vehicular access is provided from the Harbor Freeway (I-110), approximately 500 feet east of Figueroa Street, and the Santa Monica Freeway (I-10), approximately 1.3 miles north of Exposition Boulevard. Exposition Park is served by 13 bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT) Downtown Area Shuttle along with the Metro E Line light rail train. The Metro E Line travels along Exposition Boulevard and has two stops adjacent to Exposition Park, at Vermont Avenue and at Trousdale Parkway adjacent to the Rose Garden.

Proposed Project

The Project is a 25-year master plan composed of nine elements:

1. Threshold & Gateway: Element 1 consists of pedestrian and bicycle enhancements including:

- Protected cycle tracks along Exposition Boulevard, Figueroa Street, and MLK, Jr. Boulevard
- Bicycle sharrows (shared lane markings) on Bill Robertson Lane
- New street trees, planting buffers, widened sidewalks, crosswalk markings, pedestrian seating, wayfinding signage, and gateway enhancements

<u>2. Expo Festival Plaza</u>: Element 2 would enhance the existing lawn area between the Visitor Parking Structure and Banc of California Stadium with a system of paths and promenades. It would also include raising the roadway of Christmas Tree Lane to the plaza level, delineated by bollards ("zero curb").

<u>3. Solar Garden</u>: Element 3 would provide shade and electricity generation through artistic solar panels installed over the top level of the Visitor Parking Structure.

<u>4. Festival Park & Community Promenade</u>: Element 4 would relocate parking lots 4, 5, and 6 to a 2,000-space subterranean parking garage in the same location and install public open space at ground level. The open space would include a festival lawn, recreational areas (such as a playground, skate park, and plaza), a pedestrian promenade, an information center with restrooms, and a bus parking lot. The subterranean parking structure would accommodate parking for approximately 94 buses on its topmost level and would have direct-access ramps to and from westbound MLK, Jr. Boulevard in addition to access from Figueroa Street and Hoover Street.

<u>5. Bill Robertson Lane</u>: Element 5 would improve Bill Robertson Lane to provide street trees, dedicated loading zones, sharrows, and a lane for bus drop-off. It would include a striped two-way left-turn lane in the center of the street and a zero curb delineated by bollards.

<u>6. Museum Walk</u>: Element 6 would enhance the pedestrian experience on State Drive, an eastwest street north of the California Science Center. The improvements would include new paving, shade trees, seating, wayfinding, and other amenities. It would remain accessible by vehicles for emergency access or during major events.

<u>7. California African American Museum Sculpture Garden</u>: Element 7 would create a sculpture garden for the California African American Museum, located north of the Visitor Parking Structure. The sculpture garden would include a plaza, dining area, and garden.

<u>8. Zanja Madre</u>: Element 8 would consist of a gathering space with two sunken lawns south of the Natural History Museum.

<u>9. Olympic Ring Walk</u>: Element 9 would enhance the pedestrian experience around the Coliseum with landscaping, concessions, and amenities along with festive lighting and banners.

Most of these elements would be contained within Exposition Park and would not affect access or circulation. Only Element 4 specifically modifies access to a parking area through the direct access ramps on MLK, Jr. Boulevard. The Project would result in a slight increase in the number of striped parking spaces (by approximately 280 spaces), but would have an essentially neutral effect on the maximum parking capacity of Exposition Park overall, because implementation of Element 8 would prevent the use of the existing South Lawn as temporary parking on event days.

CEQA ANALYSIS OVERVIEW

OEPM is the Lead Agency in the development and certification of the environmental documentation for the Project. OEPM is, therefore, responsible for identifying a suitable methodology for the assessment of potentially significant transportation impacts of the Project based on CEQA guidelines, as established in California Public Resources Code Section 21000-21189 and detailed in California Code of Regulations, Title 14, Section 15000-15389.

In accordance with the CEQA guidelines, this analysis considered four questions:

- 1. Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- 2. Would the Project conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
- 3. 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)?
- 4. Would the Project result in adequate emergency access?

An affirmative answer to any of these questions would be considered a potentially significant impact to transportation requiring that the Project include all feasible mitigation to reduce the impact.

Other types of transportation impacts, including any dealing with congestion metrics or level of service (LOS), are not considered significant and are not required to be analyzed under CEQA.

The analysis presented herein considers relevant commentary received in response to the Project's Initial Study issued on January 22, 2020. The Project development team hosted a public scoping meeting on February 4, 2020 during which written and verbal commentary was accepted, and additional written comments to OEPM were accepted through February 21, 2020. Key comments from Metro and a nearby resident addressed potential CEQA-related concerns with specific elements of the Project.

1. WOULD THE PROJECT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES?

The Project was reviewed for consistency with any transportation-related programs, plans, ordinances, and policies applicable to Exposition Park. These consisted of policy documents at the state, regional, county, and city level. The following documents were reviewed:

- Regional Comprehensive Plan (Southern California Association of Governments [SCAG], 2008) (RCP)
- Regional Transportation Plan / Sustainable Communities Strategy (SCAG, April 2016) (RTP/SCS)
- Mobility Element (Chapter 7) of *Los Angeles County General Plan* (Los Angeles County [County], October 2015) (County Mobility Element)
- 2010 Congestion Management Program for Los Angeles County (Metro, 2010) (CMP)
- *Mobility Plan 2035: An Element of the General Plan* (Los Angeles Department of City Planning, January 2016) (City Mobility Plan)
- South Los Angeles Community Plan (Los Angeles Department of City Planning, November 2017) (Community Plan)
- The California Museum of Science and Industry Exposition Park Master Plan (Zimmer Gunsul Frasca Partnership, May 1992) (Exposition Park Master Plan)
- Los Angeles Memorial Coliseum Renovation Project Draft Environmental Impact Report (Christopher A. Joseph & Associates, September 2003) (Coliseum Renovation Project EIR) and Coliseum District Specific Plan Overlay District (Coliseum Specific Plan)

<u>SCAG RCP</u>

The RCP is an advisory plan addressing important regional issues, including transportation, to serve local agencies in preparing plans for handling local issues of regional significance. Its policies focus on best practices, legislation, and coordination in ensuring that transportation investments are as effective as possible at meeting broad goals of an efficient and clean transportation system. The Project would not interfere with any of the policies of the RCP.

SCAG RTP/SCS

The SCAG RTP/SCS is a State- and federally-mandated long-range planning document that seeks to guide land use growth toward more compact communities rather than suburban sprawl in order to reduce air pollution and greenhouse gas emissions. This requires that urban neighborhoods be provided with efficient and robust public transportation, safely walkable and bikeable communities, and preserved natural land whenever possible.

The Project would support the following goals of the SCAG RTP/SCS:

- <u>Goal 6:</u> Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
- <u>Goal 8:</u> Encourage land use and growth patterns that facilitate transit and active transportation.

In support of Goals 6 and 8, the Project would improve outdoor open space and the recreational and cultural facilities at Exposition Park and minimize the visibility of automobile parking options. It also improves bicycle facilities on the perimeter of Exposition Park and walking facilities throughout the interior. Because it is located adjacent to two Metro E Line stops and is also served by 13 bus routes, it is easily accessible by public transportation, further encouraging active transportation modes and improving air quality.

Most of the goals and policies of the SCAG RTP/SCS are to be implemented at the regional level rather than by individual projects, and the Project would not interfere with implementation of any other goal or policy of the SCAG RTP/SCS. Therefore, the Project is consistent with the SCAG RTP/SCS.

County Mobility Element

The County Mobility Element identifies the County's plan to provide for the transportation of pedestrians, cyclists, transit users, and vehicles on County roads and streets. Exposition Park is located within the City, rather than an unincorporated part of the County; therefore, the County Mobility Element is not applicable to the Project.

<u>CMP</u>

The CMP is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the Regional Transportation Improvement Program and State Transportation Improvement Program processes. However, in 2019, Metro and a majority of the 89 local jurisdictions in the County voted to opt out of the CMP in accordance with State law. Therefore, the CMP no longer applies in the County nor to the Project.

City Mobility Plan

The City Mobility Plan combines "complete street" principles with the following five goals that define the City's mobility priorities:

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

The Project would support City Mobility Plan Policy 1.1, Roadway User Vulnerability, and Policy 2.6, Bicycle Networks, by implementing protected cycle tracks on Exposition Boulevard, Figueroa Street, and MLK, Jr. Boulevard, improving bicycle safety on those streets (Element 1). It would support Policy 2.1, Adaptive Reuse of Streets, by modifying Bill Robertson Lane to provide a three-lane cross-section (including a two-way left-turn lane), sharrows for bicycles, dedicated loading zones, and zero curbs for enhanced pedestrian capacity and accessibility (Element 5). It would support Policy 2.3, Pedestrian Infrastructure, by improving the pedestrian experience throughout the Project site. It would support Policy 4.4, Community Collaboration, through the improvement of existing open space and installation of additional quantities of open space designed for gathering at Exposition Park. It would support Policy 4.13, Parking and Land Use Management, by replacing surface parking at Lots 4, 5, and 6 with a festival park over structured parking, providing a large new space for public gathering.

The Project would not interfere with any other policies or programs of the City Mobility Plan and would, therefore, be consistent with it.

Community Plan

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles. This Project falls within the boundaries of the South Los Angeles Community Plan.

The Project would support Community Plan Policy LU1.3, Parks and Open Space, by improving and adding open space and pedestrian networks at Exposition Park. It would similarly support Policy LU7.14, Street Vending, as the addition of public gathering space provides additional opportunities for street vending. It would support Policy LU11.3, Green Building Practices, by converting surface parking to subterranean structured parking topped with green space and covering the Visitor Parking Lot in decorative solar panels (Element 3). It similarly would support Policies LU11.4, Conserve Energy, and LU11.6, Implement Sustainability Policies, through the solar panels and the sunken lawns in Element 8, which double as retention basins. The Project would support Policies LU19.8, Streetscape Plans, and LU19.9, Transit Access, through pedestrian improvements and integrated connectivity to the Metro E Line stations along Exposition Boulevard.

The Project would support Community Plan Policy M4.1, Priority Bikeways, by installing protected cycle tracks on Figueroa Street and MLK, Jr. Boulevard (Element 1), which are designated by the Community Plan as priority bicycle streets. (The Project would also implement a protected cycle

track on Exposition Boulevard, which is not a priority bicycle street.) It would also support Policy M9.3, Multimodal Options and Connectivity, by emphasizing pedestrian infrastructure within Exposition Park, bicycle infrastructure around the perimeter and on Bill Robertson Lane, and connections to existing public transit service. The Project would support Policy M10.3, Parking Structures, by replacing surface Lots 4, 5, and 6 with a subterranean parking structure.

The Project would support Policy CF8.1, Maintain and Improve Existing [Recreational] Facilities. It would support Policy CF12.2, Accommodate Active Park Uses, by providing additional open space. It would support Policy CF13.2, Street Trees, by installing street trees on Bill Robertson Lane and around the Project perimeter. It would support Policy CF19.4, Rainwater Harvesting, through the sunken lawns in Element 8. It would support Policy CF20.5, Reduce Greenhouse Gas Emissions, through the installation of solar panels over the top level of the Visitor Parking Structure (Element 3).

The Project does not interfere with any other policies in the Community Plan. Therefore, it is consistent with the Community Plan.

Exposition Park Master Plan

The Exposition Park Master Plan presents a long-term vision to guide the development of Exposition Park and is the predecessor document to the proposed Project. With regard to parking, the Exposition Park Master Plan proposed subterranean structure parking in various places, including below the California Science Center (this was not constructed), at the Visitor Parking Structure (this now exists), under the site of the Lucas Museum (this is under construction as museum parking), and south of the Coliseum (this is proposed as part of the Project). Surface-level parking was suggested to be able to be used for hard-surface recreational activities (such as basketball) when not needed for park uses, but the Project does not include surface-level parking lots.

With regard to circulation, the Exposition Park Master Plan focuses on preparing a clearlyorganized pedestrian circulation system that connects directly to mass transit stops on perimeter streets and even internal to Exposition Park¹. It proposed that buses would travel, stop, and stage on Christmas Tree Lane and Exposition Park Drive. With the Project, mass transit would remain on the perimeter of Exposition Park and private buses would generally use Bill Robertson Lane or Hoover Street to Lots 4, 5, and 6 for loading and staging.

The Exposition Park Master Plan proposed to allow passenger vehicles to travel east and west on Exposition Park Drive, including on major event days, to access parking. The Project, on the other hand, would eliminate the connection between Christmas Tree Lane and Exposition Park Drive and would, thus, only allow passenger vehicle access on perimeter streets, Christmas Tree Lane, and Bill Robertson Lane.

The Exposition Park Master Plan anticipated various infrastructure improvements that have since been implemented, including: making 37th Street one-way eastbound and Exposition Boulevard one-way westbound between Figueroa Street and I-110; to install a bus platform below I-110

¹ A bus route was envisioned that would travel on Christmas Tree Lane and Exposition Park Drive (named Olympic Promenade in the Exposition Park Master Plan) between Bill Robertson Lane and Figueroa Street.

between Exposition Boulevard and 37th Street; making Flower Street one-way southbound; and the Metro E Line along Exposition Boulevard connecting Santa Monica and downtown Los Angeles. It mentions the possibility of a bikeway along Exposition Boulevard, which is analogous to the protected cycle track proposed as part of the Project.

Coliseum Renovation Project EIR and Specific Plan

The Coliseum Renovation Project EIR studied the reduction of the Coliseum's maximum seating capacity from 92,500 persons to approximately 78,000 persons, including the addition of luxury suites, a renovated press box, additional concession-related facilities, and up to 40,000 square feet of ancillary structures for retail or office use (Coliseum Project). The Coliseum Project would not affect Exposition Park access or parking, other than in the form of a decrease in peak parking demand and event traffic.

The First Addendum² to the Coliseum Project EIR made modifications to the architectural design of the Coliseum Project and established the Coliseum Specific Plan. The architectural modifications were confined to the Coliseum structure itself, and the Coliseum Specific Plan focused on Coliseum administration, signage, and alcohol sales. Therefore, like the Coliseum Project, the First Addendum did not affect Exposition Park access or parking.

The Second Addendum³ to the Coliseum Project EIR modified the Coliseum Project to reduce the size of the renovated press box and new concession facilities, reduce the number of luxury suites, and add outdoor loge boxes and club seats. It did not modify the planned overall maximum capacity of 78,000 persons. Also, like the Coliseum Project, the Second Addendum did not measurably affect Exposition Park access or parking.

The Third Addendum⁴ to the Coliseum Project EIR modified the Second Addendum only with regard to the placement of the video boards proposed on the interior of the Coliseum. The Fourth Addendum⁵ to the Coliseum Project EIR modifies the Coliseum Specific Plan to accommodate the construction of the Lucas Museum between Vermont Avenue and Bill Robertson Lane west of the Coliseum. The Lucas Museum, currently under construction, will be built over a two-level subterranean parking structure with 1,323 parking spaces (including approximately 600 spaces for the Lucas Museum and the remainder for the use of the Natural History Museum). The South Parking Structure with 975 spaces was completed in 2019. Both structures have primary access via driveways to Bill Robertson Lane, and the South Parking Structure has an additional access point to Vermont Avenue at Leighton Avenue. The Lucas Museum includes the vacation and closure of 39th Street between Vermont Avenue and Bill Robertson Lane, though this road could be opened during major events at Exposition Park.

² Draft Addendum to the Los Angeles Memorial Coliseum Renovation Project EIR for the Coliseum District Specific *Plan Overlay* (Christopher A. Joseph & Associates, May 2006).

³ Addendum to the Environmental Impact Report for the Los Angeles Memorial Coliseum Renovation Project (Eyestone Environmental, April 2016).

⁴ *Third Addendum to the Los Angeles Memorial Coliseum Renovation Project EIR* (Eyestone Environmental, December 2016).

⁵ Fourth Addendum to the Environmental Impact Report for the Los Angeles Memorial Coliseum Renovation Project (Eyestone Environmental, April 2017).

The major elements of the Coliseum Project, as modified through the Third Addendum, were completed in 2019. The Lucas Museum is scheduled to open in 2021. The Project, as proposed, accounts for all aspects of the Coliseum Project and the Coliseum Specific Plan.

2. WOULD THE PROJECT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B)?

CEQA Guidelines Section 15064.3, subdivision (b), (Section 15064.3) deals with a Project's potential to result in significant impacts with respect to vehicle miles traveled (VMT), the number and distance of automobile travel attributable to a project. Section 15064.3, subdivision (b)(1), specifically states that "projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact." Given the Project's adjacency to two Metro E Line stations on Exposition Boulevard as well as proximity to 13 bus lines, the Project meets this criterion and therefore would not have a significant transportation impact with respect to Section 15064.3.

Notwithstanding the above, the Project is not expected to increase existing VMT based on efficiency metrics (i.e., VMT per visitor) that are commonly employed on land use projects. Standard trip generation metrics for a public park⁶ use the park's land area as the basis for estimating trip generation. Since Exposition Park's overall land area would not change as a result of the Project, neither would the number of vehicle trips based on that factor. The Project may result in greater park attendance due to improved aesthetics, placemaking, and open spaces such as the festival lawn in Element 4. However, a potential increase in attendance would not likely change general travel patterns in a manner that would increase VMT per visitor. For example, one likely consequence of the Project is that nearby residents would find Exposition Park a more attractive place to visit on a regular basis for general recreation. This would increase the share of short-distance trips to and from Exposition Park, including many by non-automobile modes, and would thus result in a reduction in VMT per visitor.

3. 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)?

The Project would minimally alter access and circulation at Exposition Park compared to the present condition. It would install new access points and passenger loading on MLK, Jr. Boulevard and protected cycle tracks on Exposition Boulevard, Figueroa Street, and MLK, Jr. Boulevard.

Access and loading on MLK, Jr. Boulevard

The Project would install new direct-access ramps to and from Westbound MLK, Jr. Boulevard to access the proposed subterranean parking structure as part of Element 4. This design allows drivers to enter and exit the parking structure without impeding westbound through traffic on MLK, Jr. Boulevard, as would be the case with a standard perpendicular driveway. Further, pedestrian

⁶ e.g., rates from *Trip Generation*, *10th Edition* (Institute of Transportation Engineers, 2017).

and bicycle traffic would be routed around these ramps within the Element 4 open space, thereby never conflicting with vehicular traffic.

The Project would also dedicate a passenger loading area adjacent to Element 4 between the entry and exit ramps to the subterranean parking structure. This area, intended primarily to accommodate transportation network companies such as Uber and Lyft but available for any passenger pick-up or drop-off operations, would be installed in a turnout separated from westbound traffic by a concrete median, thereby improving safety for passengers and drivers compared to loading in the curb lane, as often occurs today with no permanent facilities to accommodate passenger loading.

OEPM would work with City staff to identify the best way to minimize mid-block U-turns of vehicles looking to arrive from or depart to eastbound MLK, Jr. Boulevard (whether for the passenger loading area or the subterranean parking structure), such as signage or a physical median on MLK, Jr. Boulevard. Additionally, to ensure that neither the parking entry nor the passenger loading area entry cause congestion on MLK, Jr. Boulevard, the City's event traffic control plan would be adjusted to provide active traffic control (i.e., traffic control officers along with signage and traffic cones as necessary) at those entrances.

The proposed new driveways would be designed according to City building code and other LADOT standards. The driveways would be reviewed by the Department of Building and Safety, Bureau of Engineering, and LADOT as needed to ensure safe pedestrian and vehicular design. The Project does not propose any sharp curves or otherwise dangerous features in the design and, therefore, no significant impact would occur as a result of potential design hazards.

Cycle Tracks

The Project would install new protected cycle tracks on Exposition Boulevard, Figueroa Street, and MLK, Jr. Boulevard. On Exposition Boulevard, the only bicycle-vehicle conflicts from this cycle track would be at Bill Robertson Lane and at a delivery driveway near Figueroa Street, neither of which would result in a hazard. At Bill Robertson Lane, the cycle track would give way to a standard continental crosswalk, alerting riders to proceed with caution as at any intersection. The delivery driveway carries minimal vehicular traffic and visibility is good for both drivers and cyclists.

On Figueroa Street, the protected cycle tracks would result in a similar condition at vehicular crossing points (including at State Street, 39th street / Christmas Tree Lane, and just south of the Banc of California Stadium) as exists today with on-street bicycle lanes and would not result in any additional hazard.

On MLK, Jr. Boulevard, the protected cycle tracks would be routed around the north side of the proposed new access points at Element 4, maintaining complete separation of vehicular and bicycle traffic, thus not resulting in a hazard.

In a public comment, Metro noted that during large events at Exposition Park, there is heavy pedestrian traffic between Exposition Park and the two Metro E Line stations along Exposition Boulevard and, during post-event egress, substantial queues of pedestrians waiting to board E Line trains in a controlled area along Exposition Boulevard. Metro expressed concern that the proposed cycle track along Exposition Boulevard could interfere with these operations and lead

to unsafe conflicts between pedestrians and bicyclists. However, even with the proposed cycle track, there would be sufficient remaining space between the Rose Garden and the cycle track to accommodate queued pedestrians. During major events, when Metro controls this operation, signage could be placed on the cycle track requiring riders to dismount and walk their bikes through the controlled zone, and permanent signage could warn both pedestrians and bicyclists about the potential conflict at the major crossing points. With these measures, there would be no significant safety impact resulting from the installation of the cycle track on Exposition Boulevard.

4. WOULD THE PROJECT RESULT IN ADEQUATE EMERGENCY ACCESS?

The Project would not result in any direct change to Exposition Park attendance nor to the allowable number and size of special events held at the various Exposition Park venues. It would not affect traffic operations, other than potential improvement along MLK, Jr. Boulevard due to the addition of the direct access ramps. Access points would be maintained on Exposition Boulevard (at Bill Robertson Lane), on Figueroa Street (at 39th Street / Christmas Tree Lane), and on MLK, Jr. Boulevard (at Bill Robertson Lane and Hoover Street). Additional minor access points are available on each street for emergency access. The OEPM Public Safety Strategic Operating Procedures (SOPs) include emergency evacuation plans for individual parts of Exposition Park and overall SOPs that would be updated following completion of each Master Plan Element. The California Highway Patrol patrols Exposition Park and its buildings and provides timely and appropriate responses to safety problems outlined in the SOPs. The Park Policies and Enforcement Section of the SOPs includes traffic control, which is enforced by the Department of Public Safety; parking violations; and unlawful camping. Emergency and nonemergency protocols are outlined in detail in the SOPs. There would be no change to capacity and service related to the public transit routes and capacity as a result of the proposed Master Plan Area. Therefore, there would be no impact. No mitigation or further analysis is warranted.