

# IV. Environmental Impact Analysis

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## J. Transportation

### 1. Introduction

This section of the Draft EIR analyzes the Project's potential transportation/traffic impacts. This section is based on the *CEQA Thresholds Analysis for the Sunset Gower Studios Preservation and Enhancement Plan, Hollywood, California* (Transportation Analysis) prepared by Gibson Transportation Consulting, Inc., dated February 2020 and included in Appendix J of this Draft EIR. The Transportation Analysis follows the Los Angeles Department of Transportation's (LADOT) July 2019 *Transportation Assessment Guidelines* (TAG), which are described in more detail below. The Transportation Analysis was approved by LADOT on April 2, 2020.<sup>1</sup>

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which went into effect in January 2014, and directed the Governor's Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes the requirements for transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. As set forth in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

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<sup>1</sup> *The Project was initially analyzed for potential transportation impacts using the level of service (LOS) methodology. This analysis is included within the Transportation Impact Study for the Sunset Gower Studios Preservation and Enhancement Plan (Gibson Transportation Consulting, Inc., October 2018) (Approved Transportation Study) and was reviewed and approved by LADOT via an inter-departmental memorandum to the Los Angeles Department of City Planning (LADCP) on October 31, 2018. According to LADOT guidance, the Approved Transportation Study satisfies the TAG requirements for non-CEQA analysis. This non-CEQA Approved Transportation Study is included as Appendix J for informational purposes.*

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which had been released August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts.

In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018. The City of Los Angeles adopted the updated guidelines on February 28, 2019.

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

Additionally, on August 9, 2019, LADOT issued guidance on the implementation of the state mandated analysis of VMT:

*On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines.... To manage this transition LADOT will honor executed MOUs for traffic studies that were processed under the prior LOS-based guidelines; however, we strongly recommend that these projects also evaluate VMT as part of their transportation analysis. The VMT analysis will help guarantee the project discloses the appropriate information as required by CEQA in the event that the project does not receive their entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects.*

The Approved Traffic Study was approved by LADOT in October 2018, prior to the adoption of the TAG. However, because the provisions of SB 743 are now operative, the analysis below focuses on VMT and is based on the Transportation Assessment prepared by Gibson Transportation and included in Appendix J of this Draft EIR.

As indicated above, SB 743 also adds Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”<sup>2</sup> A “transit priority area” is defined as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”<sup>3</sup> PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”<sup>4</sup> PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.<sup>5</sup>

The Project is an employment center project, as it is located on property that is zoned to permit commercial uses with a maximum floor area ratio (FAR) of 1.5:1, which is greater than the 0.75 FAR required by Public Resources Code Section 21099(a) to be considered an employment center. In addition, the Project Site is located on an infill site within 0.5 mile from major transit stops. The Project Site is served by numerous Los Angeles County Metropolitan Transportation Authority (Metro) bus lines and LADOT transit service, the majority of which provide a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Specifically, several bus stops are located along Sunset Boulevard and Gower Street, including Metro bus line 2, DASH Hollywood, and DASH Hollywood/Wilshire. In addition, the Metro Hollywood/Vine Station is located less than 0.5 mile northwest of the Project Site. Therefore, the Project is located in a transit priority area, as defined in PRC Section 21099.<sup>6</sup> As such, pursuant to PRC Section 21099, the Project’s aesthetic and parking impacts shall not be considered significant impacts on the environment. Refer to Section II, Project Description, of this Draft EIR, for a discussion of the Project’s parking.

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<sup>2</sup> PRC Section 21099(d)(1).

<sup>3</sup> PRC Section 21099(a)(7).

<sup>4</sup> PRC Section 21064.3.

<sup>5</sup> PRC Section 21099(a)(4).

<sup>6</sup> The City’s ZIMAS System confirms the location of the Project Site within a Transit Priority Area. See Zoning Information File No. 2452 and Parcel Profile Report for 1642 N. Wilcox Ave. ([www.zimas.lacity.org](http://www.zimas.lacity.org)).

## 2. Environmental Setting

### a. Regulatory Framework

#### (1) CEQA Guidelines Section 15064.3

As discussed above, recent changes to CEQA include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 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. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.2 (November 2019) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the City's TAG.

#### (2) Congestion Management Program

The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. The CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Metro initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

### (3) Southern California Association of Governments' 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016–2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations (MPO) throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.<sup>7</sup> Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.<sup>8</sup> Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.<sup>9</sup> The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS.<sup>10,11</sup> Refer to Section IV.E, Land Use, of this Draft EIR, for a detailed discussion of the relevant provisions of the 2016–2040 RTP/SCS that apply to the Project.

### (4) Framework Element and Mobility Plan 2035

The City of Los Angeles General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. The goals, objectives, policies, and related implementation programs of the Framework Element's Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999.

<sup>7</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 166, adopted April 2016.

<sup>8</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.

<sup>9</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 76.

<sup>10</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 77, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan.

<sup>11</sup> Los Angeles County Metropolitan Transportation Authority (Metro). "High Quality Transit Areas—Southwest Quadrant."

In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which is an update to the Transportation Element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.<sup>12</sup> The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. The Mobility Plan includes five main goals that define the City’s high-level mobility priorities:

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

Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan. Refer to Section IV.G, Land Use, of this Draft EIR for a discussion of the Project’s consistency with the Transportation Chapter of the Framework Element and with Mobility Plan 2035.

Street classifications/standards are designated in the Transportation Element of the City of Los Angeles General Plan. The Mobility Plan has modified those street standards to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access. Roadways are now defined as follows in the Mobility Plan:

- Freeways—High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- Arterial Streets—Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
  - Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:

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<sup>12</sup> Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, approved by City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.

- Boulevard I provides up to four travel lanes in each direction with a target operating speed of 40 mph.
- Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph.
- Avenues pass through both residential and commercial areas and include three categories:
  - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
  - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
  - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.
- Collector Streets—Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.
- Local Streets—Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local Streets can be:
  - Continuous local streets that connect to other streets at both ends
  - Non-Continuous local streets that lead to a dead-end

The Mobility Plan also includes the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network. The Transit Enhanced Network is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within 1 mile of the network by 2035. The Mobility Plan proposes to design and implement by 2035 Pedestrian Enhanced Districts within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and areas with the highest concentration of pedestrian fatalities and severe injuries. Pedestrian Enhanced Districts include pedestrian improvements on arterial streets that are intended to provide better walking connections to and from the major destinations within communities. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

## (5) Plan for a Healthy Los Angeles

*Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan* (LADCP, March 2015) (Plan for a Healthy Los Angeles) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.

## (6) Los Angeles Municipal Code (LAMC)

The LAMC includes numerous provisions regarding transportation that apply to the Project including Section 12.21.A.16 regarding parking, Section 12.26J regarding transportation demand measures (TDM), and Section 12.37 regarding expansion of buildings along certain street designations. In addition, with regard to construction traffic, Section 41.40 of the Los Angeles Municipal Code (LAMC) limits construction activities to the hours from 7:00 A.M. to 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and national holidays. No construction is permitted on Sundays.

## (7) Vision Zero

As described in *Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025* (City of Los Angeles, August 2015), Vision Zero is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death. Vision Zero has identified the High Injury Network, a network of streets based on the collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. The Project Site is located in the High Injury Network. Specifically, Sunset Boulevard, adjacent to the northern boundary of the Project Site, has been identified in the High Injury Network. The following corridors in the Project vicinity have been identified in the High Injury Network:

- Franklin Avenue west of Cahuenga Boulevard and between Beachwood Drive and
- Gramercy Place
- Yucca Street between Cahuenga Boulevard and Argyle Avenue
- Hollywood Boulevard
- Selma Avenue west of Vine Street
- Santa Monica Boulevard
- Cahuenga Boulevard between Franklin Avenue and Yucca Street

- Ivar Avenue between Sunset Boulevard and Fountain Avenue
- Vine Street south of Franklin Avenue
- Wilton Place between Sunset Boulevard and Santa Monica Boulevard
- Western Avenue south of Franklin Avenue

## (8) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines include guidelines pertaining to pedestrian-first design, which serves to reduce VMT.

## (9) Walkability Checklist

*Walkability Checklist—Guidance for Entitlement Review* (LADCP, November 2008) (Walkability Checklist) serves as a guide for enhancing pedestrian movement, access, comfort, and safety to contribute to the overall walkability of the City. Transportation-applicable topics include:

- Sidewalks;
- Crosswalks/Street Crossings;
- On-Street Parking;
- Building Orientation; and
- Off-Street Parking and Driveways.

## (10) LADOT Transportation Technology Strategy and Manual of Policies and Procedures

The LADOT transportation technology strategy, based on *Urban Mobility in a Digital Age: A Transportation Technology Strategy for Los Angeles* (August 2016), is designed to ensure the City stays on top of emerging transportation technologies as both a regulator and a transportation service provider. This strategy document includes the following goals:

- Data as a Service: Providing and receiving real-time data to improve the City's ability to serve transportation needs;

- Mobility as a Service: Improving the experience of mobility consumers by encouraging partnerships across different modes and fostering clear communication between transportation service providers; and
- Infrastructure as a Service: Re-thinking how the City pays for, maintains, and operates public, physical infrastructure to provide more transparency.

LADOT also developed *Technology Action Plan* (2019) to realize the vision developed in Transportation Technology Strategy. Key action steps include:

- Develop a comprehensive digital inventory of the City's signs, parking meters, curb paint, and regulatory tools;
- Continue to develop and maintain the Automated Traffic Surveillance and Control system;
- Use active management strategies to dynamically monitor and control things like speed limits, parking availability, detour routes, etc.;
- Develop a mobility data specification around which software tools can be developed and data can be accessed; and
- Develop a transportation tax model that minimizes data collection and retention in favor of user privacy.

In addition, LADOT's *Manual of Policies and Procedures* (December 2008) provides plans and requirements for traffic infrastructure features in the City such as roadway striping and other markings, signage, on-street parking, crosswalks, and turn lanes.

## **b. Existing Conditions**

### **(1) Existing Street Systems**

The existing street system in the vicinity of the Project Site consists of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access.

#### *(a) Streets and Highways*

Listed below are the primary streets and highways that provide regional and local access to the Project Site:

- Wilcox Avenue—Wilcox Avenue is a designated Avenue III. It travels in the north-south direction and is located west of the Project Site. It provides

two 11- to 14-foot-wide travel lanes, one lane in each direction. One-hour and two-hour metered and unmetered parking is generally provided on both sides of the street within the Project vicinity.

- Cahuenga Boulevard—Cahuenga Boulevard is a designated Avenue II south of Franklin Avenue and a designated Avenue I north of Franklin Avenue. It travels in the north-south direction west of the Project Site. It generally provides four 10-foot-wide travel lanes, two lanes in each direction, and left-turn lanes at most intersections. Two-hour metered parking is generally provided on both sides of the street within the Project vicinity.
- Ivar Avenue—Ivar Avenue is a designated Local Street. It travels in the north-south direction and is located west of the Project Site. It generally provides two 14-foot-wide travel lanes, one lane in each direction. Two-hour metered parking is generally provided on both sides of the street within the Project vicinity.
- Vine Street—Vine Street is a designated Avenue II. It travels in the north-south direction and is located west of the Project Site. It generally provides four 11-foot-wide travel lanes, two lanes in each direction, and left-turn lanes at most intersections. One-hour and two-hour metered and unmetered parking is generally provided on both sides of the street within the Project vicinity.
- Argyle Avenue—Argyle Avenue is a designated Local Street. It travels in the north-south direction and is located west of the Project Site. It generally provides four 11-foot-wide travel lanes, two lanes in each direction, and left-turn lanes at most intersections. One-hour and two-hour metered and unmetered parking is generally provided on both sides of the street within the Project vicinity.
- El Centro Avenue—El Centro Avenue is a designated Local Street. It travels in the north-south direction and is located west of the Project Site. It generally provides two 10- to 14-foot-wide travel lanes, one lane in each direction. Unmetered parking is generally provided on both sides of the street within the Project vicinity.
- Gower Street—Gower Street is a designated Modified Avenue III. It travels in the north-south direction and is located along the western boundary of the Project Site. It generally provides two 10-foot-wide travel lanes, one lane in each direction, and left-turn lanes at most intersections. One-hour metered parking with afternoon peak-hour restrictions is generally available on the west side of the street and one-hour metered parking with morning and afternoon peak-hour restrictions is generally available on the east side of the street between Hollywood Boulevard and Sunset Boulevard. Unmetered parking is generally provided on both sides of the street north of Hollywood Boulevard and south of Sunset Boulevard within the Project vicinity.

- Beachwood Drive—Beachwood Drive is a designated Collector Street north of Franklin Avenue, a private driveway to the Project Site at Sunset Boulevard, and a designated Local Street south of Fountain Avenue. It travels in the north-south direction and provides direct access to the Project Site. It continues north of Franklin Avenue, located north of the Project Site, and south of Fountain Avenue, located south of the Project Site. It generally provides two 11- to 17-foot-wide travel lanes, one lane in each direction, and left-turn lanes at most intersections. Unmetered parking is generally provided on both sides of the street within the Project vicinity.
- Gordon Street—Gordon Street is a designated local street. It travels in the north-south direction and is located east of the Project Site. It generally provides two 11- to 12-foot-wide travel lanes, one lane in each direction. Unmetered parking is generally provided on both sides of the street within the Project vicinity.
- Bronson Avenue—Bronson Avenue is a designated Modified Avenue III. It travels in the north-south direction and is located east of the Project Site. It generally provides two 10- to 11-foot-wide travel lanes, one lane in each direction, and left-turn lanes at most intersections. Both sides of the street provide bicycle lanes between Fountain Avenue and Santa Monica Boulevard. Two-hour and one-hour unmetered and unrestricted curbside parking is generally available on both sides of the street within the Project vicinity.
- Van Ness Avenue—Van Ness Avenue is a designated Modified Collector Street south of US-101, a designated Collector Street between US-101 and Sunset Boulevard, and designated a Local Street north of US-101. It travels in the north-south direction and is located east of the Project Site. It generally provides two 11-foot-wide travel lanes, one lane in each direction, and left-turn lanes at most intersections. Two-hour unmetered parking is generally available on the west side of the street and unrestricted parking is generally provided on the east side of the street within the Project vicinity.
- Wilton Place—Wilton Place is a designated Modified Avenue III. It travels in the north-south direction and is located east of the Project Site. It generally provides two to four 9.5- to 12-foot-wide travel lanes, one to two lanes in each direction, and left-turn lanes at most intersections. Unmetered parking is generally available on both sides of the street north of Hollywood Boulevard. Unmetered parking with peak-hour restrictions is generally provided on both sides of the street south of Hollywood Boulevard within the Project vicinity.
- Western Avenue—Western Avenue is a designated Modified Avenue III. It travels in the north-south direction and is located east of the Project Site. It generally provides four 9.5- to 12-foot-wide travel lanes, two lanes in each direction, and left-turn lanes at most intersections. One-hour and two-hour metered and unmetered parking is generally provided on both sides of the street between Franklin Avenue and Sunset Boulevard. One-hour metered parking is

generally provided on the west side of the street south of Sunset Boulevard within the Project vicinity.

- Franklin Avenue—Franklin Avenue is a designated Modified Avenue III west of Cahuenga Boulevard and a designated Modified Avenue II east of Cahuenga Boulevard. It travels in the east-west direction and is located north of the Project Site. It generally provides two to four 9.5- to 12-foot-wide travel lanes, one to two lanes in each direction, and left-turn lanes at most intersections. Two-hour unmetered parking (with nighttime prohibitions, except by parking permit) is generally provided on the south side of the street and unrestricted parking is generally provided on the north side of the street west of Wilcox Avenue. Two-hour unmetered parking with afternoon peak-hour restrictions is generally provided on the north side of the street and unrestricted parking is generally provided on the south side of the street between Cahuenga Boulevard and Ivar Avenue. Both one-hour unmetered and unrestricted curbside parking is generally provided on the south side of the street east of Ivar Avenue.
- Yucca Street—Yucca Street is a designated Local Street west of Cahuenga Boulevard and east of Vine Street and a designated Avenue II between Cahuenga Boulevard and Vine Street. It travels in the east-west direction and is located north of the Project Site. It generally provides two 10- to 13-foot-wide travel lanes, one lane in each direction, and left-turn lanes at most intersections. Two-hour metered parking is generally provided on both sides of the street within the Project vicinity.
- Carlos Avenue—Carlos Avenue is a designated Local Street. It travels in the east-west direction and is located north of the Project Site. It generally provides two 11- to 13-foot-wide travel lanes, one lane in each direction. Unmetered parking is generally provided on both sides of the street within the Project vicinity.
- Hollywood Boulevard—Hollywood Boulevard is a designated Avenue I. It travels in the east-west direction and is located north of the Project Site. It generally provides four 10- to 12-foot-wide travel lanes, two lanes in each direction, and left-turn lanes at most intersections. Two-hour metered parking is generally available on both sides of the street within the Project vicinity.
- Selma Avenue—Selma Avenue is a designated Local Street. It travels in the east-west direction and is located north of the Project Site. It generally provides two 11-foot-wide travel lanes, one lane in each direction. Two-hour metered parking is generally provided on both sides within the Project vicinity.
- Sunset Boulevard—Sunset Boulevard is a designated Avenue I. It travels in the east-west direction and is located adjacent to the northern boundary of the Project Site. It generally provides four to six 9.5- to 11-foot-wide travel lanes, two to three lanes in each direction, and left-turn lanes at most intersections. Although parking restrictions are variable, one-hour metered parking with

peak-hour restrictions is generally provided on both sides of the street within the Project vicinity.

- Fountain Avenue—Fountain Avenue is a designated Collector Street. It travels in the east-west direction and is located along the southern boundary of the Project Site. It generally provides two 12- to 13-foot-wide travel lanes, one lane in each direction. Unmetered parking is generally provided on both sides of the street within the Project vicinity.
- Santa Monica Boulevard—Santa Monica Boulevard is a designated Modified Avenue I. It travels in the east-west direction and is located south of the Project Site. It generally provides four 9.5- to 11-foot-wide travel lanes, two lanes in each direction, and left-turn lanes at most intersections. Although parking restrictions vary along the corridor, one-hour metered parking with peak-hour restrictions is generally provided on both sides of the street within the Project vicinity.
- Melrose Avenue—Melrose Avenue is a designated Avenue II. It travels in the east-west direction and is located south of the Project Site. It generally provides four 10-foot-wide inside travel lanes, two lanes in each direction, and left-turn lanes at most intersections. Although parking restrictions vary along the corridor, one-hour metered parking with peak-hour restrictions is generally provided on both sides of the street within the Project vicinity.

*(b) Regional Transportation System*

*(i) Freeways*

Primary regional access to the Project vicinity is provided by the Hollywood Freeway (US-101). US-101 generally runs in the northwest-southeast direction and is located 0.4 mile east of the Project Site. In the Project vicinity, US-101 provides four travel lanes in each direction. Access to and from US-101 is available via interchanges at Sunset Boulevard, Western Avenue, Hollywood Boulevard, and Santa Monica Boulevard.

*(ii) Transit System*

Public transit service within the Project vicinity is currently provided by the Los Angeles County Metropolitan Transit Authority (Metro), LADOT Transit Commuter Express (CE), and LADOT DASH. In addition to the bus lines that provide service within the Project vicinity, the Metro Red Line subway operates in the Project vicinity. The Metro Red Line runs between North Hollywood and downtown Los Angeles, connecting with the Metro Orange Line in North Hollywood, the Metro Purple Line at Wilshire Boulevard, the Metro Blue and Expo Lines in downtown Los Angeles, and the Metro Gold Line at Union Station. In the vicinity of the Project Site, the Metro Red Line has a station at Hollywood Boulevard and Vine Street, less than 0.5 mile northwest of the Project Site.

Existing transit service in the Project vicinity is summarized in Table 3 of the Transportation Study, included in Appendix J of this Draft EIR. The average frequency of transit service during the peak hour was derived from the number of peak period stops made at the stop nearest the Project Site. The Metro and DASH bus lines within 0.25 mile of the Project Site currently provide additional capacity for 1,062 transit trips during the morning peak hour and 901 transit trips during the afternoon peak hour.

*(c) Existing Parking and Site Access*

The Project Site includes three parking structures providing a total of 1,398 parking spaces. Vehicular access to the Project Site is provided along Sunset Boulevard at North Beachwood Drive and along four driveways along Gordon Street.

*(d) Existing Bicycle and Pedestrian Facilities*

*(i) Bicycle Facilities*

Based on the City's 2010 Bicycle Plan, the existing bicycle system in the Project vicinity consists of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle lanes (Class II) are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. Bicycle routes and bicycle-friendly streets (Class III) are those where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes and bicycle-friendly streets are preferably located on collector and lower volume arterial streets. Bicycle routes with shared lane markings, or "sharrows," make motorists aware of bicycles potentially in the travel lane, and show bicyclists the correct direction of travel. The following bicycle facilities are provided in the Project vicinity:

Bicycle Lane (Class II)

- Cahuenga Boulevard north of Yucca Street
- Bronson Avenue between Fountain Avenue and Santa Monica Boulevard

Bicycle Routes (Class III)

- Wilcox Avenue
- Vine Street south of Yucca Street
- Argyle Avenue between Franklin Avenue and Selma Avenue
- Van Ness Avenue between Fountain Avenue and La Mirada Avenue

- Franklin Avenue east of Argyle Avenue
- Yucca Street west of Argyle Avenue
- Selma Avenue west of Gower Street
- Fountain Avenue west of Sunset Boulevard

*(ii) Pedestrian Facilities*

The area surrounding the Project Site includes a mature network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features. The sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The sidewalks also provide connectivity to pedestrian crossings at intersections within the Project vicinity.

The walkability of a location is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile. These attributes are quantified by WalkScore.com and assigned a score out of 100 points. With the various commercial businesses adjacent to residential neighborhoods of the Hollywood district, the walkability of the Project Site is approximately 89 points.<sup>13</sup>

## **c. Future Traffic Context**

### **(1) Related Projects**

The transportation analysis for the Project considered the effects of other development proposals (related projects) either proposed, approved, or under construction in the study area. The list of related projects in the vicinity of the Project Site that could affect traffic conditions in the study area is based on information on file at the City of Los Angeles Department of City Planning and LADOT. A total of 105 related projects were identified in the vicinity of the Project Site, as shown in Table III-1 in Section III, Environmental Setting, of this Draft EIR. The locations of the related projects are shown in Figure III-1 in Section III of this Draft EIR.<sup>14</sup> While the buildout years of many of these

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<sup>13</sup> *WalkScore.com (www.walkscore.com) rates the Project Site (1438 N. Gower Street) with a score of 89 of 100 possible points (scores accessed on July 30, 2018). Walk Score calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel.*

<sup>14</sup> *As discussed in Section III, Environmental Setting, of this Draft EIR, Related Project No. 105, the Hollywood Community Plan Update, is also included in the list of related projects. The Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2028, well before the Community Plan Update's horizon (Footnote continued on next page)*

related projects are uncertain and may be well beyond the buildout year of the Project or may never be approved or developed, all related projects were conservatively considered.

## (2) Future Transportation System Improvements

### (a) Future Roadway Improvements

The analysis of Future conditions considered roadway improvements at Bronson Avenue and Hollywood Boulevard, Bronson Avenue and Sunset Boulevard, and Western Avenue and Sunset Boulevard that have been funded and are reasonably expected to be implemented prior to Project buildout. Other proposed traffic/trip reduction strategies such as the proposed creation of a Hollywood Transportation Management Organization and Transportation Demand Management (TDM) programs for individual buildings and developments were conservatively omitted from the analysis.

### (b) City Bicycle Plan

The 2010 Bicycle Plan identifies the City's vision for a more integrated bicycle network throughout the City. It proposes new bicycle lanes on Yucca Street between Cahuenga Boulevard and Vine Street, Hollywood Boulevard, Sunset Boulevard, Fountain Avenue, Santa Monica Boulevard, Cahuenga Boulevard north of Melrose Avenue, Vine Street south of Yucca Street, and Wilton Place south of Franklin Avenue. It also proposes bicycle-friendly streets on Franklin Avenue, Carlos Avenue, Selma Avenue west of El Centro Avenue, Lexington Avenue between Gower Street and St. Andrews Place, Lemon Grove east of Wilton Place, Waring Avenue west of Gower Street, Argyle Avenue north of Selma Avenue, Gower Street south of Fountain Avenue, Van Ness Avenue, and St. Andrews Place between Fountain Avenue and Lexington Avenue. There is currently no schedule for implementation of these bicycle lanes.

### (c) Mobility Plan 2035

In the Mobility Plan, the City identifies key corridors as components of various "mobility-enhanced networks." Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements that may be implemented in those networks have not yet been identified, and there is no schedule for implementation and, therefore, no changes to vehicular lane configurations were made as a result of the Mobility Plan.

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*year. Moreover, 2028 is a similar projected buildout year as many of the 104 related development projects. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.*

However, the following mobility-enhanced networks do include corridors within the Project vicinity:

- Transit Enhanced Network: Hollywood Boulevard was identified as a Moderate Transit-Enhanced Street, Santa Monica Boulevard was identified as Comprehensive Transit-Enhanced Street, and Western Avenue south of Hollywood Boulevard was identified as a Moderate Plus Transit Enhanced Street.
- Neighborhood Enhanced Network: The following corridors were identified as part of a Neighborhood Enhanced Network:
  - Franklin Avenue
  - Yucca Street between Argyle Avenue and Vista Del Mar Avenue
  - Carlos Avenue between Vista Del Mar Avenue and Bronson Avenue
  - Selma Avenue west of El Centro Avenue
  - Carlton Way between Bronson Avenue and Canyon Drive
  - Harold Way between Canyon Drive and Van Ness Avenue
  - De Longpre Avenue between El Centro Avenue and Gower Street
  - Fountain Avenue
  - La Mirada Avenue between Bronson Avenue and Van Ness Avenue
  - Lexington Avenue between Gower Street and St. Andrews Place
  - Lemon Grove east of Wilton Place
  - Waring Avenue west of Gower Street
  - Cahuenga Boulevard south of Hollywood Boulevard
  - Argyle Avenue between Franklin Avenue and Selma Avenue
  - El Centro Avenue between Selma Avenue and De Longpre Avenue
  - Vista Del Mar Avenue between Yucca Street and Carlos Avenue
  - Gower Street south of De Longpre Avenue
  - Bronson Avenue between South Yucca Street and Carlos Avenue, between Hollywood Boulevard and Carlton Way, and between Fountain Avenue and La Mirada Avenue

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- Canyon Drive between Carlton Way and Harold Way
  - Van Ness Avenue south of Harold Way
  - Wilton Place between Sunset Boulevard and Fernwood Avenue
  - St. Andrews Place between Fountain Avenue and Lexington Avenue
  - Bicycle Enhanced Network / Bicycle Lane Network: Hollywood Boulevard and Melrose Avenue were identified for Protected Bicycle Facilities. The following corridors were identified for Bicycle Lanes:
    - Cahuenga Boulevard north of Hollywood Boulevard
    - Vine Street south of Yucca Street
    - Wilton Place between Franklin Avenue and Sunset Boulevard and south of Fernwood Avenue
    - Western Avenue north of Franklin Avenue
    - Yucca Street between Cahuenga Boulevard and Vine Street
    - Sunset Boulevard
    - Santa Monica Boulevard
  - Vehicle Enhanced Network: Sunset Boulevard west of US-101 was identified as part of the Vehicle Enhanced Network.
  - Pedestrian Enhanced District: The following corridors were identified as part of the Pedestrian Enhanced District:
    - Franklin Avenue
    - Yucca Street between Cahuenga Boulevard and Vine Street
    - Hollywood Boulevard west of Van Ness Avenue and east of Wilton Place
    - Sunset Boulevard west of Beachwood Drive and east of St. Andrews Place
    - Fountain Avenue between Cahuenga Boulevard and Gower Street and east of St. Andrews Place
    - Santa Monica Boulevard between Wilcox Avenue and Gower Street and east of Ridgewood Place
    - Melrose Avenue between Lillian Way and Gower Street and east of Wilton Place

- Wilcox Avenue between Franklin Avenue and Fountain Avenue
- Cahuenga Boulevard between Franklin Avenue and Fountain Avenue and between La Mirada Avenue and Willoughby Avenue
- Cole Avenue between De Longpre Avenue and Romaine Street
- Vine Street between Franklin Avenue and Melrose Avenue
- Gower Street between Carlos Avenue and Fountain Avenue
- Bronson Avenue between US-101/Carlos Avenue and Carlton Way
- Wilton Place between Virginia Avenue and Sierra Vista Avenue
- Western Avenue south of Franklin Avenue

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to transportation/traffic if it would:

***Threshold (a): Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; or***

***Threshold (b): Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);***

***Threshold (c): Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or***

***Threshold (d): Result in inadequate emergency access.***

SB 743 (PRC Section 21099(b)(1)) directed OPR to prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within TPAs. The revised guidelines are required to prohibit the consideration of automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, new CEQA Guidelines Section 15064.3(a), adopted in December 2018, states “a project’s effect on automobile delay does not constitute a significant environmental impact.” As noted above, on July 30, 2019, the City adopted

VMT as a criterion in determining transportation impacts under CEQA and LADOT issued guidance for complying with the City's new thresholds on August 9, 2019. Nevertheless, based on current guidance, VMT is analyzed below under Threshold (b).

For this analysis the Appendix G Thresholds provided above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The methodology and base assumptions used in this analysis were established by LADOT, and, where LADOT does not prescribe a specific methodology, the criteria identified in the L.A. CEQA Thresholds Guide were used. The L.A. CEQA Thresholds Guide criteria is discussed below as part of the methodology discussion.

## **b. Methodology**

### **(1) Consistency with Plans, Programs, Ordinances, or Policies**

As discussed above, with implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As such, this analysis will not go into detail on the anticipated effect of the Project with respect to LOS. As described above, CEQA Guidelines threshold (a) has been updated to require an analysis of the proposed Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. In accordance with the TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent.

### **(2) Vehicle Miles Traveled**

#### ***(a) VMT Impact Thresholds***

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds. As discussed above, the CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG in July 2019. Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG states that

a residential project would result in a significant VMT impact if it would generate household VMT per capita higher than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee higher than 15 percent below the existing average work VMT per employee for the APC area in which it's located.

Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT. The TAG identifies a daily household VMT per capita impact threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6 for the Central APC area. Therefore, should the Project's average work VMT per employee be equal to or lower than 7.6, the Project's overall VMT impact would be less than significant. The Project does not include any residential uses. Therefore, household VMT is not analyzed.

*(b) VMT Analysis Methodology*

LADOT developed City of Los Angeles VMT Calculator Version 1.2 (November 2019) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with the TAG.

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in *City of Los Angeles VMT Calculator Documentation*, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as follows:

1. Suburban (Zone 1): Very low-density primarily centered around single-family homes and minimally connected street network.
2. Suburban Center (Zone 2): Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.
3. Compact Infill (Zone 3): Higher density neighborhoods that include multi-story buildings and well-connected streets.
4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network.

The VMT Calculator determines a Project's TBZ based on the latitude and longitude of the project address.

As detailed in City of Los Angeles VMT Calculator Documentation, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following sociodemographic, land use, and built environment factors for the Project area:

- The project's jobs/housing balance;
- Land use density of the project;
- Transportation network connectivity;
- Availability of and proximity to transit;
- Proximity to retail and other destinations;
- Vehicle ownership rates; and
- Household size.

The VMT Calculator determines a Project's VMT based on trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the Project's VMT.

**Employment Assumptions.** As previously stated, the VMT thresholds identified in the TAG are based on work VMT per employee. Thus, the VMT Calculator contains employment assumptions derived from multiple data sources, including *2012 Developer Fee Justification Study* (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, *Trip Generation, 9th Edition* (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling resources.<sup>15</sup> A summary of employment assumptions for various land uses is provided in Table 1 of *City of Los Angeles VMT Calculator Documentation*.

Additionally, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of transportation demand management strategies as project design features or mitigation measures. The following seven categories of TDM strategies are included in the VMT Calculator:

## 1. Parking

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<sup>15</sup> *The 2018 LAUSD Developer Fee Justification Study and Trip Generation 10th Edition are now available, but City's VMT Calculator utilized the editions indicated herein.*

2. Transit
3. Education and Encouragement
4. Commute Trip Reductions
5. Shared Mobility
6. Bicycle Infrastructure
7. Neighborhood Enhancement

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in *Quantifying Greenhouse Gas Mitigation Measures* (California Air Pollution Control Officers Association, 2010).

### (3) Hazardous Geometric Design Features

Threshold T-3 of the TAG requires that a Project undergo further evaluation if it proposes new access points or modifications along the public right-of-way (i.e., street dedications). A review of Project access points, internal circulation, and parking access would determine if the Project would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts.

### (4) Emergency Access

In consultation with LAFD, the analysis of the Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination was made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

## c. Project Design Features

- TR-PDF-1:** A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the

vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Sunset Boulevard and Gordon Street, to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Schedule of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside commuter peak hours (after 7:00 A.M. or before 3:00 P.M.) to the extent feasible.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.
- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.

- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

**TR-PDF-2:** The Applicant shall implement a Transportation Demand Management (TDM) Program that will include but not be limited to the following transportation demand management measures:

- Educational Programs/On-Site TDM Coordinator who reaches out to employers and employees promoting the benefits of TDM;
- Centrally located Transportation Information Center/Kiosk where employees and visitors can obtain information regarding commute programs and real-time commuter information;
- Bicycle and pedestrian-friendly environment with exclusive access points, secured bicycle facilities, and showers;
- A one-time fixed-fee contribution of \$75,000 to be deposited into the City's Bicycle Plan Trust Fund prior to the issuance of any certificates of occupancy to be used to implement bicycle improvements within the Project area;
- Ridesharing Services Program which would match employees together to establish carpools and vanpools;
- Guaranteed ride home (GRH) program;
- Short-term car rentals;
- Incentives for using alternative travel modes such as discounted monthly transit passes, carpool and vanpool preferential load/unload areas or designated parking spaces, a
- "parking cash-out" subsidy, and/or unbundled parking;
- Mobility Hub support of existing and/or future efforts by LADOT for Mobility Hubs by providing amenities such as bicycle parking and rentals, shared vehicle rentals, and transit information, etc. at the project site (subject to design feasibility);
- Make a one-time financial contribution of \$75,000 to the City of Los Angeles Department of Transportation to be used in the implementation of the Mobility Hub in the general area of the Project;

- Project membership and participation in the Hollywood Community Transportation Management Organization (TMO) should the TMO become operational. The Hollywood TMO's services could replace some of the in-house TMO services where applicable, such as ridesharing matching services for multi-employee carpools and vanpools. Project representatives should attend organization meetings for the TMO, provide parking and travel demand data to the TMO, pay any established dues to the TMO, and make available information to project tenants relative to the services provided by the TMO. The TMO would offer similar services to those described above but would have a much wider reach than the project's local TDM plan and can result in much greater trip reduction benefits. The TMO's activities would help augment or implement some of the strategies described above for the project specific TDM plan;
- Record a Covenant and Agreement to ensure that the TDM program will be maintained.

## d. Analysis of Project Impacts

***Threshold (a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

### (1) Impact Analysis

Table 2.1-2 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: Mobility Plan 2035; Plan for a Healthy Los Angeles, the LAMC; Vision Zero; Citywide Design Guidelines; Walkability Checklist; and LADOT's Transportation Technology Strategy and Design Standards. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

#### *(a) Mobility Plan 2035*

As discussed above, the 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 location and site access are consistent with the goals of the Mobility Plan as the Project does not require any dedications or improvements along the streets adjacent to the Project perimeter to serve the long-term mobility needs identified in Mobility Plan 2035. In addition, the Project does not propose repurposing existing curb space and does not propose narrowing or shifting existing sidewalk placement or paving, narrowing, shifting, or removing an existing parkway. Further, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along a street with a bicycle facility. The Project would meet the goals of the Mobility Plan and would not interfere with any other policies of the Mobility Plan. Thus, the Project would be consistent with the Mobility Plan. The following provides further details of the policies and programs in the Mobility Plan that are applicable to the Project.

- **Policy 2.3 Pedestrian Infrastructure—Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.** Pedestrian access would be maintained on Sunset Boulevard, Gordon Street, and Gower Street. Streetscape amenities provided by the Project would include new street trees on Gordon Street, Fountain Avenue, and Gower Street, low-level exterior lighting along pathways, and landscaped courtyards with seating. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.
- **Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service.** As detailed in Tables 4A and 4B of the Approved Transportation Study, the transit system serving the Project Site has available capacity for 1,062 additional person-transit trips during the morning peak hour and 901 additional person-transit trips during the afternoon peak hour. The Project would generate approximately 77 net new transit trips during the morning peak hour and 76 net new transit trips during the afternoon peak hour, or approximately less than 8 percent of the available capacity during the morning or afternoon peak hours. Furthermore, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress, in 2008 and Measure M, an additional half-cent sales tax increase to fund transportation projects, in 2016. As such, the Project's net increase in transit trips would be partially offset by improvements to transit service in the Project area. Accordingly, the Project would not cause the capacity of the transit system to be substantially exceeded and the Project would not conflict with Mobility Plan Policy 2.5. No streets adjacent to the Project Site have been identified as part of the Transit Enhanced Network, and thus, the Project would not interfere with future improvements to existing and future transit services. Nonetheless, the Project would not preclude

of any future implementation of bus lanes or other transit improvements along the streets adjacent to the Project, including along Sunset boulevard, Gordon Street, Fountain Avenue, and Gower Street. The Project would encourage more transit usage by developing an office project with convenient access to both rail (Metro B Line) and local bus services.

- **Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.** As summarized above and described in detail in Chapter 2 of the Approved Transportation Study, the existing bicycle system in the Project vicinity consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle routes with shared lane markings, or “sharrows,” are located along Fountain Avenue, adjacent to the Project Site. In the Mobility Plan, Tier 1 Protected Bicycle Lanes are proposed along Hollywood Boulevard and Melrose Avenue as part of the Bicycle Enhanced Network (a network of protected bicycle lanes and bicycle paths that provide a higher level of comfort for a variety of users). In addition, as part of the Bicycle Lane Network (a network of arterial roadways that will receive striping treatments to prioritize bicyclists), Tier 2 and Tier 3 Bicycle Lanes are proposed on Cahuenga Boulevard north of Hollywood Boulevard, Vine Street south of Yucca Street, Wilton Place between Franklin Avenue and Sunset Boulevard and south of Fernwood Avenue, Western Avenue north of Franklin Avenue, Yucca Street between Cahuenga Boulevard and Vine Street, Sunset Boulevard, and Santa Monica Boulevard. Although access to the Project Site is provided along a street segment identified as part of the Bicycle Lane Network, the Project would not preclude the implementation of future bicycle facilities, including those along Sunset Boulevard. Furthermore, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrians. Bicycle parking requirements per LAMC Section 12.21-A,16(a) include short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points and long-term bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public. In accordance with the requirements of LAMC Section 12.21-A, 16(a), the Project would provide 284 bicycle parking spaces, including 102 short-term and 182 long-term bicycle parking spaces. Therefore, the Project would not conflict with Mobility Plan Policy 2.6.
- **Policy 2.10 Loading Area—Facilitate the provision of adequate on- and off-street loading areas.** The Project would maintain its existing loading area on-site and shielded from the public right-of-way by the office and studio-related uses surrounding the site. Access to the loading areas would be maintained and provided at the existing driveways along Sunset Boulevard, as well as Gordon Street, which can facilitate larger vehicles and avoid pedestrian conflicts along Sunset Boulevard. As such, delivery trucks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

- **Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network.** As discussed above in the analyses for Policy 2.5 and 2.6, the Project would not conflict with Mobility Plan policies related to transit and bicycle networks. With respect to pedestrian facilities, pedestrian access would be provided via sidewalks along Sunset Boulevard, Gordon Street, and Gower Street. Additionally, as noted above, the sidewalks along Gordon Street, Fountain Avenue, and Gower Street would be upgraded with additional street trees as part of the Project. Bicycles would have the same access opportunities as pedestrians and the Project would provide 284 bicycle parking spaces. Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. The Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, or Bicycle Enhanced Network.
- **Program PL.1.** Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. Vehicular access to the Project Site would be maintained via an existing full-access driveway on Sunset Boulevard at Beachwood Drive and existing full-access driveways on Gordon Street, which is a non-arterial street. Emergency and limited access is provided along Fountain Avenue. The Project does not propose any new driveways and all driveways will be maintained to limit potential impediments to visibility and minimize potential pedestrian and vehicular conflicts. Therefore, the Project would not conflict with Mobility Plan Program PL.1.
- **Program PK.10.** Program PK.10 directs the City to establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. Specifically, as discussed above, the Project would include streetscape improvements that would promote walking along the sidewalks adjacent to the Project frontages. In addition, the Project would comply with the emergency access requirements set forth by the Los Angeles Fire Department (LAFD). The Project design would also be reviewed by LAFD and the Los Angeles Department of Building and Safety during the City's plan review process to ensure all applicable requirements are met. Therefore, the Project would not conflict with Mobility Plan Program PK.10.

*(b) Plan for a Healthy Los Angeles*

The Project supports healthy lifestyles by reducing single-occupant vehicle trips by virtue of its location near to abundant high-quality and high-frequency transit options and its provision of a TDM measures and participation in the Hollywood TMO. Specifically, the Project would provide a 1,450-square-foot bicycle parking facility and a total 284 bicycle

parking spaces, including 102 short-term and 182 long-term bicycle parking spaces. Therefore, the Project would not conflict with any other policies recommended by the plan. Therefore, it is consistent with Plan for a Healthy Los Angeles.

*(c) Los Angeles Municipal Code (LAMC)*

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. In accordance with the requirements of the LAMC, the Project would provide a total 284 bicycle parking spaces, including 102 short-term and 182 long-term bicycle parking spaces.

LAMC Section 12.26J, the TDM Ordinance, establishes TDM requirements for projects with at least 25,000 square feet of non-residential floor area. The Project would incorporate TDM measures as part of the project design aimed at encouraging use of alternative transportation modes in line with the requirements set forth in the TDM Ordinance.

LAMC Section 12.37 pertains to development or expansion of buildings along Highways and Collector Streets and also applies to streets designated Boulevard I, Boulevard II, Avenue I, Avenue II, and Avenue III in the Mobility Plan. Sunset Boulevard is a designated Avenue I, Gower Street is a designated Modified Avenue III, and Fountain Avenue is a designated Collector Street in the Mobility Plan. Per the Mobility Plan, Sunset Boulevard adjacent to the Project Site requires a 35-foot half-width roadway within a 50-foot half-width right-of-way, Gower Street adjacent to the Project Site requires a 24-foot half-width roadway within a 36-foot half-width right of way, and Fountain Avenue adjacent to the Project Site requires a 20-foot half-width roadway within a 33-foot half-width right of way. Because Sunset Boulevard, Gower Street, and Fountain Avenue adjacent to the Project Site meet the half-width roadway and right-of-way requirements of the Mobility Plan, the Project would not conflict with LAMC Section 12.37.

*(d) Vision Zero*

As discussed above, Sunset Boulevard, adjacent to the northern boundary of the Project Site, has been identified in the High Injury Network. The following corridors within the Project vicinity are currently identified as part of the High Injury Network:

- Franklin Avenue west of Cahuenga Boulevard and between Beachwood Drive and Gramercy Place
- Yucca Street between Cahuenga Boulevard and Argyle Avenue
- Hollywood Boulevard

- Selma Avenue west of Vine Street
- Santa Monica Boulevard
- Cahuenga Boulevard between Franklin Avenue and Yucca Street
- Ivar Avenue between Sunset Boulevard and Fountain Avenue
- Vine Street south of Franklin Avenue
- Wilton Place between Sunset Boulevard and Santa Monica Boulevard
- Western Avenue south of Franklin Avenue

In 2019, LADOT installed new minor street crosswalks and continental crosswalk upgrades at several intersections along Hollywood Boulevard as part of the Hollywood Boulevard Safety Improvements Project, Sunset Boulevard as part of the Sunset Boulevard Safety Improvements Project, and Western Avenue as part of the Western Avenue Safety Improvements (Lexington Avenue to Russell Avenue) Project within the Project vicinity. No Vision Zero improvements are currently planned near the Project site. The Project would not preclude future Vision Zero safety improvements by the City. Thus, the Project does not conflict with Vision Zero.

*(e) Citywide Design Guidelines*

The Project site promotes the safety and comfort of pedestrians by providing adequate sidewalks along the perimeter of the Project Site, new pedestrian walkway and landscaped courtyards to connect new buildings, and trees and seating to provide adequate shade and a more comfortable mobility environment for pedestrians. Therefore, the Project would align with *Citywide Design Guidelines* and *City of Los Angeles Urban Design Principles* to provide a safe, comfortable, and accessible experience for all transportation modes. Refer to Section IV.G, Land Use, for additional analysis of the Project's consistency with the Citywide Design Guidelines.

*(f) Walkability Checklist*

The Project would provide continuous and adequate sidewalks along the Project Site, enhance pedestrian amenities through landscaped courtyards, paseos, and walkways, provide trees, accent paving, seating, and other landscape elements to provide adequate shade and habitat to for a more comfortable mobility environment for pedestrians. These features support the Walkability Checklist recommendations regarding the pedestrian experience. Refer to Section IV.G, Land Use, for additional analysis of the Project's consistency with the Walkability Checklist.

*(g) LADOT's Transportation Technology Strategy and Design Standards*

As discussed above, LADOT's *Urban Mobility in a Digital Age: A Transportation Technology Strategy for Los Angeles* and *Technology Action Plan* are designed to ensure the City stays on top of and implements emerging transportation technologies as both a regulator and a transportation service provider.

The Project would not interfere with any of the general policy recommendations, pilot proposals, or action steps set forth in these documents. Additionally, the Project would comply with all applicable LADOT design standards.

*(h) Other Plans and Policies*

As discussed in detail in Section IV.G, Land Use, of this Draft EIR, the Project would not conflict with SGAG RTP/SCS or Hollywood Community Plan policies related to encouraging pedestrian activity and reducing VMT. In addition, as discussed in Section IV.G. Land Use, the Project would not conflict with the relevant goals and policies of the Redevelopment Plan. Therefore, the Project would not conflict with these plans, and policies.

**Based on the above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.**

(2) Mitigation Measures

The Project is consistent with adopted City plans, programs, ordinances and policies regarding the circulation system. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

The Project is consistent with adopted City plans, programs, ordinances and policies regarding circulation. Impacts would be less than significant without mitigation.

***Threshold (b): Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?***

(1) Impact Analysis

As described in the Transportation Analysis, LADOT's VMT Calculator was developed to estimate project-specific daily work VMT per employee for developments within City limits. In order to evaluate the VMT generated by the Project's creative office

and studio-related land uses, which are not currently recognized within the VMT Calculator, a “General Office” square footage equivalency calculation was conducted for the creative office and studio-related land uses based on a comparison of the respective daily trip generation rates.<sup>16</sup>

The empirical daily trip generation rates for the studio-related uses and the standard daily trip rates for the “General Office” land use are detailed in Table 8 of the Approved Transportation Study. Under the Approved Transportation Study assumptions, the daily trip rates for “General Office” were already applied to the creative office space to provide a conservative trip generation analysis and, therefore, the “General Office” square footage equivalency calculation was only applied to the studio-related land uses. The results of the “General Office” square footage equivalency calculation are detailed in Table IV.J-1 on page IV.J-35. As shown, the daily trip generation estimates for the studio-related uses on the Project Site upon completion (53,778 sf of production support space and 169,412 sf of sound stage space) were found to be equivalent to the daily trip generation estimates of 139,607 sf “General Office” space. Thus, upon completion, the Project’s creative office and studio-related land uses would be similar in scope and behavior to 992,400 sf of “General Office” space.

The “General Office” square footage equivalency calculation was also conducted for the existing studio-related land uses on site. As shown in Table IV.J-2 on page IV.J-36, the daily trip generation estimates for 56,050 sf of production support space and 175,058 sf of sound stage space were found to be equivalent to the daily trip generation estimates of 144,521 sf “General Office” space. In total, the Project’s creative office and studio-related land uses currently on site are similar in scope and behavior to 523,500 sf of “General Office” space.

Note that a “General Office” square footage equivalency calculation for the existing 6,516 sf of restaurant space was not conducted as that land use is currently recognized within the VMT Calculator and would be maintained on site.

**VMT Calculator Assumptions.** The Project’s land use type assumptions (“General Office” and high-turnover restaurant) and their respective sizes were used as the primary input in the VMT Calculator. Based on the Project’s proposed land uses and location, the following assumptions were identified in the VMT Calculator:

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<sup>16</sup> *This analysis is included within the CEQA Thresholds Analysis for the Sunset Gower Studios Preservation and Enhancement Plan, Hollywood, California prepared by Gibson Transportation Consulting, Inc., dated February 2020. This analysis was reviewed and approved by LADOT via an inter-departmental memorandum to the Los Angeles Department of City Planning (LADCP) on April 2, 2020. A copy of LADOT’s Assessment Letter of the Transportation Analysis is included as Appendix J of this Draft EIR.*

**Table IV.J-1  
Development of Office Equivalency**

Project/Land Use	Size	Total Project Daily Trips <sup>b</sup>
<b>Approved Transportation Study<sup>a</sup></b>		
<b>Project Site Upon Completion</b>		
Office	852,793 sf	
Stage	169,412 sf	
Support	53,778 sf	
Restaurant	6,516 sf	
<i>Total Project Floor Area Upon Completion</i>	<i>1,082,499 sf</i>	<i>9,225</i>
<b>Existing Project Site</b>		
Office	378,979 sf	
Stage	175,058 sf	
Support	56,050 sf	
Restaurant	6,516 sf	
<i>Total Existing Project Floor Area</i>	<i>616,603 sf</i>	<i>5,115</i>
<b>Office Equivalency<sup>c</sup></b>		
<b>Project Site Upon Completion</b>		
General Office	992,400 sf	
Restaurant	6,516 sf	
<i>Total Project Floor Area Upon Completion</i>	<i>998,916 sf</i>	<i>9,225</i>
<b>Existing Project Site</b>		
General Office	523,500 sf	
Restaurant	6,516 sf	
<i>Total Existing Project Floor Area</i>	<i>530,016 sf</i>	<i>5,115</i>
<p><i>sf = square feet</i></p> <p><sup>a</sup> Based on floor area program proposed in the Transportation Impact Study for the Sunset Gower Studios Preservation and Enhancement Plan (Approved) Transportation Study).</p> <p><sup>b</sup> Total Project Daily trips based on Table 8 of the Approved Transportation Study, which was based on ITE trip rates for office and empirical trip rates for production stage and support.</p> <p><sup>c</sup> Office equivalency floor area based on comparison with ITE daily trip rates for general office and total Project daily trips from Approved Transportation Study.</p> <p>Source: Gibson Transportation Consulting, Inc., 2020.</p>		

**Table IV.J-2  
VMT Evaluation Summary**

Project Description		Total Population <sup>a</sup>	Total Employees <sup>b</sup>		Area Planning Commission (APC)	Travel Behavior Zone (TBZ) <sup>c</sup>	Maximum VMT Reduction <sup>d</sup>				
<b>Project Information</b>											
General Office: 992,400 sf Restaurant: 6,516 sf		0	3,996		Central	Urban	75%				
Scenario	TDM Strategies	Household VMT <sup>e</sup>					Work VMT				
		Total VMT	Household VMT	VMT per Capita	VMT Threshold	Sig. VMT Impact?	Total VMT	Work VMT <sup>f</sup>	VMT per Emp.	VMT Threshold	Sig. VMT Impact?
<b>VMT Evaluation</b>											
Project	None	0	0	0.0	6.0	No	44,311	24,923	6.2	7.6	No
Project <sup>g</sup>	1. Promotions and Marketing to Encourage Alternative Transportation Options 2. Provide/Improve On-Street Bicycle Facilities Along Project Site 3. Bicycle Parking per LAMC Requirements 4. Provide Additional Bicycle Amenities On-Site 5. Pedestrian Network Improvements Within the Project and Connecting Off-Site	0	0	0.0	6.0	No	40,912	23,011	5.8	7.6	No
<p><i>sf = square feet</i></p> <p><sup>a</sup> <i>The Project does not include residential uses. Therefore, no residential population would be generated by the Project.</i></p> <p><sup>b</sup> <i>Total employment estimate is based on the following employment factors:</i></p>											

**Table IV.J-2 (Continued)  
VMT Evaluation Summary**

Project Description	Total Population <sup>a</sup>	Total Employees <sup>b</sup>	Area Planning Commission (APC)	Travel Behavior Zone (TBZ) <sup>c</sup>	Maximum VMT Reduction <sup>d</sup>
<p><i>General Office: 4.0 employees/1,000 sf</i>  <i>High-Turnover Sit-Down Restaurant: 4.0 employees/1,000 sf</i>                      The employment factors are based on employee data from the Los Angeles Unified School District, 2012 SANDAG Activity Based Model, ITE trip generation rates, US Department of Energy, and other modeling resources.</p> <p><sup>c</sup> An “Urban” TBZ is defined in City of Los Angeles VMT Calculator Documentation (LADOT and DCP, February 2019) as higher density neighborhoods characterized by multi-story buildings with a dense road network.</p> <p><sup>d</sup> The maximum allowable VMT reduction is based on the Project’s designated TBZ.</p> <p><sup>e</sup> The Project does not include residential uses. Therefore, the Project would not generate household VMT.</p> <p><sup>f</sup> Work VMT is based on the “home-based work attraction” trip types.</p> <p><sup>g</sup> The following TDM strategies will be implemented as part of either the Project design features and/or mitigation measures:</p> <ul style="list-style-type: none"> <li>(1) Educational and promotional materials (e.g., posters, informational boards, etc.) to inform employees of transportation options.</li> <li>(2) Provide improvements to bicycle facilities around the Project Site.</li> <li>(3) Project short-term and long-term bicycle parking spaces in accordance with LAMC requirements to support bicycle travel.</li> <li>(4) Provide additional bicycle amenities within the Project Site.</li> <li>(5) Implement pedestrian connections internal to the Project Site and to off-site pedestrian facilities.</li> </ul> <p>Source: Gibson Transportation Consulting, Inc., 2020.</p>					

- Total Population: 0
- Total Employees: 3,996
- APC: Central
  - Household VMT Impact Threshold: 6.0 VMT per capita
  - Work VMT Impact Threshold: 7.6 VMT per employee
- TBZ: Urban
- Maximum VMT Reduction: 75%

The VMT analysis results based on the VMT Calculator are summarized in Table IV.J-2 on page IV.J-36. To provide a conservative analysis, the Project was evaluated prior to consideration of any TDM strategies as part of the Project design features and/or mitigation measures. As shown in Table IV.J-2, the VMT Calculator estimates that the Project would generate 44,311 daily VMT and 24,923 Work VMT, prior to implementation of the project design features. Thus, based on the employee assumptions above, the Project would generate an average work VMT per employee of 6.2. The work VMT per employee would fall below the significance threshold for the Central APC (7.6 work VMT per employee). Therefore, the Project would not result in a significant VMT impact and no mitigation measures would be required.

Although the Project would not result in a significant VMT impact, the TDM strategies included as Project Design Feature PDF-TR-2 were assessed for purposes of comparing the VMT results. As shown in Table IV.J-2, with implementation of the project design features, the VMT Calculator estimates that the Project would generate 40,912 daily VMT and 23,011 work VMT, resulting in an average work VMT per employee of 5.8 and an additional reduction of the Project's daily work VMT on the surrounding street system.

## (2) Mitigation Measures

Project-level impacts related to VMT would not occur. Therefore, no mitigation measures are required.

## (3) Level of Significance after Mitigation

Project-level impacts related to VMT would not occur. Therefore, no mitigation measures are required or included.

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

As discussed in Section VI, Other CEQA Consideration, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project Site would not substantially increase hazards due to a design feature. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections, and the Project does not include any proposed modifications to the street system or any dangerous design features. Specifically, vehicular access to the Project Site would be maintained via an existing full-access driveway on Sunset Boulevard at Beachwood Drive and existing full-access driveways on Gordon Street. Emergency and limited access would continue to be provided along Fountain Avenue. Although vehicle access is not provided, limited pedestrian access is provided along Gower Street, in addition to Sunset Boulevard and Gordon Street. Bicycle access to the Project site would be shared with the vehicular access. No additional access points, excessive driveway widening, or physical modifications to the public right-of-way are proposed. In addition, no street dedication is required on the streets surrounding the Project Site perimeter as the existing right-of-way meets the street standards. Furthermore, the creative office and production support uses proposed by the Project would be consistent with the surrounding uses in the vicinity of the Project Site and would not introduce any hazards onto or adjacent to the Project Site. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the Los Angeles Department of Transportation during the City's plan review process to ensure all applicable building design requirements are met. **Therefore, impacts with respect to Threshold (c) would be less than significant. No further analysis is required.**

***Threshold (d): Would the Project result in inadequate emergency access?***

(1) Impact Analysis

*(a) Construction Impacts*

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. In particular, in the vicinity of the Project Site, Hollywood Boulevard, Sunset Boulevard, and Vine Street are designated disaster/emergency routes by the City's Safety Element, and Highland and

Santa Monica Boulevard are designated disaster/emergency routes by County of Los Angeles Department of Public Works.<sup>17,18</sup>

Construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. These short-term and temporary construction activities could temporarily affect emergency response for emergency vehicles along Sunset Boulevard and other main connectors due to traffic during the Project's construction phase. However, the construction of the Project would not require the closure of any vehicle travel lanes as the majority of construction activities would take place within the Sunset Gower Studios campus. With implementation of the Construction Management Plan in accordance with Project Design Feature TR-PDF-1, emergency access would not be impeded. The Project's Construction Management Plan would require approval from LADOT prior to the start of construction to ensure that adequate and safe access will remain available within and near the Project Site during construction activities. In addition, the Project would ensure that travel lanes would continue to be maintained in each direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways, as well as on the City-designated disaster routes along Hollywood Boulevard, Sunset Boulevard, and Vine Street. **Therefore, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.**

*(b) Operational Impacts*

As described above, existing vehicular access to the Project Site would be maintained and would be provided via the existing driveways along Sunset Boulevard and Gordon Street. Internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Additionally, as set forth in Section IV.G.2, Public

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<sup>17</sup> *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit H, adopted November 26, 1996.*

<sup>18</sup> *County of Los Angeles Department of Public Works, Disaster Route Maps, Los Angeles—Central, August 8, 2013.*

Services—Police Protection, of this Draft EIR, pursuant to Project Design Feature POL-PDF-7, upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant would also submit a diagram of the Project Site to the LAPD's Hollywood Area Commanding Officer that includes access routes and any additional information that might facilitate police response. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project.

The additional traffic generated by the Project could also affect emergency response due to increased congestion. However, as discussed in the non-CEQA analysis included in the Approved Traffic Study, the Project would not result in traffic that would substantially reduce the level of service of the street system in the Project vicinity. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

**Based on the above, impacts regarding adequate emergency access would be less than significant.**

## (2) Mitigation Measures

Project-level impacts to emergency access would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts to emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

# e. Cumulative Impacts

## (1) Impact Analysis

As discussed in detail in Section III, Environmental Setting, there are 104 related projects have been identified within the Project vicinity. These related projects are accounted for in the analysis of cumulative impacts below.

*(a) Conflict With a Program, Plan, Ordinance, or Policy Addressing the Circulation System*

As discussed above, the Project's increase in transit trips would represent less than 8 percent of the available capacity during the A.M. and P.M. peak hours. Given the available capacity on transit serving the Project Site, and improvements to transit service funded by the Measure R sales tax increase, the Project and related projects would not result in a significant cumulative impact with respect to transit.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, Project impacts would be less than significant. Similar to the Project, the related projects would be required to provide short-term and long-term bicycle parking in accordance with LAMC Section 12.21-A,16(a). Furthermore, related project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. Therefore, the Project and related projects would not result in a significant cumulative impact with respect to pedestrian and bicycle facilities.

Furthermore, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Collectively, the Project and the related projects add high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity.

**Thus, Project impacts with regard to conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would not be cumulatively considerable, and cumulative impacts would be less than significant.**

*(b) Vehicle Miles Traveled*

As discussed in the TAG, cumulative effects are determined through a consistency check with SCAG's 2016–2040 RTP/SCS. As discussed in detail in Section IV.F, Greenhouse Gas Emissions, and Section IV.G, Land Use, of this Draft EIR, the Project would be consistent with the 2016–2040 RTP/SCS. Additionally, the TAG states that “projects that do not demonstrate a project impact by applying an efficiency-based impact thresholds (i.e. VMT per capita or VMT per employee)” is sufficient in demonstrating less than significant cumulative VMT impacts, as these projects are already shown to align with the long-term VMT and greenhouse gas reduction goals of the RTP/SCS. Furthermore, as described above, with implementation of the project design features, the VMT Calculator estimates that the Project would result in a less than significant VMT impact with an average work VMT per employee of 5.8, below the significance threshold for the Central

APC (7.6 work VMT per employee). **Therefore, the Project would be consistent with the long-term VMT and GHG reduction goals of the 2016–2040 RTP/SCS and Project impacts with respect to VMT would be less than significant and, as a result, the Project’s contribution to cumulative impacts would not be cumulatively considerable. Thus, the Project’s cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

*(c) Hazards due to Design Feature or Incompatible Use*

The roadways adjacent to the Project Site and in the overall Project vicinity are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. While the Project does not propose any modifications to the street system, any modifications to the street system proposed as part of the related projects would be reviewed by LADOT to ensure that such modifications do not create dangerous travel conditions. As summarized in Section III, Environmental Setting, of this Draft EIR, the related projects comprise a variety of uses, including apartments, condominiums, restaurants, hotels, office, and retail uses, as well as mixed-use developments incorporating some or all of these elements. As with the Project, such uses would be consistent with the surrounding uses in the vicinity of the Project Site and would not introduce any hazards onto or adjacent to the Project vicinity. Additionally, as with the Project, the design of related projects would also be reviewed by the Los Angeles Department of Building and Safety and LADOT during the City’s plan review process to ensure all applicable building design requirements are met. **Thus, no cumulative impacts related to increased hazard due to a design feature or incompatible use would occur.**

*(d) Emergency Access*

While the Project is not proposing any driveway or circulation modifications, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed and would not be concentrated to a specific location. Also, as previously discussed, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, as with the Project, the related projects would not result in inadequate emergency access. **As such, cumulative impacts to emergency access would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and policies; VMT/CEQA Guidelines Section 15064.3; hazardous geometric design features; and inadequate emergency access would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Cumulative impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.