

IV. IV. Environmental Impact Analysis

M. Transportation

1. Introduction

This section describes the existing traffic conditions within the Project Site and vicinity; identifies associated regulatory requirements; evaluates potential impacts related to conflicts with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system; evaluates conflicts with an applicable congestion management program; identifies whether there is a substantial increase in hazards due to a design feature or inadequate emergency access; and identifies mitigation measures related to implementation of the proposed Project.

The following discussion analyzes the Project's potential impacts on transportation and traffic. This section is based on the Transportation Impact Study (TIS) for the Kaiser Permanente Los Angeles Medical Center Project, prepared by Linscott, Law & Greenspan, Engineers in August 2018. The TIS is provided as Appendix L-1 of this Draft Environmental Impact Report (EIR). The TIS follows City of Los Angeles (City) Department of Transportation (LADOT) Transportation Impact Study Guidelines.¹ The study intersections were determined in consultation with LADOT staff. A copy of the TIS Memorandum of Understanding (MOU) is provided in Appendix A of the TIS. LADOT reviewed and approved the TIS, and a copy of LADOT's Assessment Letter of the TIS is included as Appendix L-2 of this Draft EIR. The Project-related construction traffic analysis memorandum is provided as Appendix L-3. The vehicle miles traveled (VMT) analysis and LADOT approval letter are provided as Appendices L-4 and L-5, respectively.

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which; went into effect in January 2014, and which 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 Level of Service (LOS). This started a process that changes 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

¹ City of Los Angeles Department of Transportation (LADOT), Transportation Impact Study Guidelines, December 2016.

743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained 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.”

On January 20, 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA—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 was 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, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts.

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)2020, which defines the methodology for analyzing a project’s transportation impacts in accordance with SB 743.²

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

² Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines (TAG), July 2020.

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.

As part of the preparation of LADOT TAG, the City updated its Travel Demand Forecasting (TDF) Model and transportation impact thresholds to be consistent with the VMT impact methodology. The TAG was updated in July 2020 to further refine and clarify the screening criteria and analysis methodologies that were introduced in the last update in August 2019. The transportation analysis and impact assessment of the Project provided in this section is consistent with the LADOT requirements at the time of its approval, and the recent updates to the guidelines would not change any of the findings. The Project's TIS was approved by LADOT in December 2019 (Appendix L-2); however, because the provisions of SB 743 are now operative, a discussion of VMT based on the VMT Memo included in Appendix L-4 of the Draft EIR is provided below. The Project's VMT Analysis was approved by LADOT on April 16, 2020, and is included in Appendix L-5 of the Draft EIR.

SB 743 also adds California 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." A "transit priority area" is defined as an area within 0.5 miles 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." California 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." California 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.

The Project would expand the existing Kaiser Permanente Los Angeles Medical Center campus by demolition and construction/reconstruction of medical office buildings and parking structures in a three-phase development. The Project Site is located within 0.25 miles from the Los Angeles County Metropolitan Transportation Authority (Metro) B Line Vermont/Sunset Station, as well as 14 bus lines, the majority of which provide frequency of service intervals of 15 minutes or less during the AM and PM peak commute hours. Therefore, the Project is located in a transit priority area, as defined in California PRC Section 21099. As such, pursuant to California PRC Section 21099, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment. Refer to Chapter II, Project Description, of this Draft EIR, for a discussion of the Project's parking.

2. Environmental Setting

a) Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding Transportation at the federal, state, regional, and City of Los Angeles levels. As described below, these plans, guidelines, and laws include:

- Complete Streets Act
- Senate Bill 743/CEQA Guidelines Section 15064.3
- Congestion Management Program
- Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan Framework Element, Mobility Plan 2035
- City of Los Angeles 2010 Bicycle Plan Vision Zero
- Citywide Design Guidelines
- City of Los Angeles Municipal Code
 - Construction Traffic
 - Vermont-Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan

(1) State

(a) *Complete Streets Act*

The Complete Streets Act (Assembly Bill 1358; Government Code Sections 65040.2 and 65302) was signed into law in 2008. The law requires that when updating the part of a local general plan that addresses roadways and traffic flows, cities and counties must ensure those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, and transit riders, as well as motorists.

(b) *Senate Bill No. 743/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 miles 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.³ Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact.⁴ 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.⁵ A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment based on substantial evidence.⁶ As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.2 (VMT Calculator)⁷ 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 TAG.

(2) **Regional**

(a) *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, Los Angeles County 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

³ California Environmental Quality Act (CEQA) Guidelines Section 15064.3(b)(1).

⁴ CEQA Guidelines Section 15064.3(b)(1).

⁵ CEQA Guidelines Section 15064.3(b)(4).

⁶ CEQA Guidelines Section 15064.3(b)(4).

⁷ LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator, User Guide, May 2020.

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.

(b) *Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy*

In May 2020 the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)—also referred to as Connect SoCal—for the limited purpose of submitting the plan to the Federal Highway Administration and Federal Transit Administration for review prior to the June 1, 2020, deadline, as required by the Clean Air Act. On September 3, 2020, the SCAG Regional Council unanimously voted to approve Resolution No. 20-624-1 to (1) adopt the 2020–2045 RTP/SCS (Connect SoCal) Program EIR Addendum and Revised Mitigation Monitoring and Reporting Program; (2) approve Connect SoCal in its entirety; and (3) submit Connect SoCal to the California Air Resources Board for confirmation that the RTP/SCS meets greenhouse gas reduction targets. Connect SoCal presents the land use and transportation vision for the region through the year 2045, providing a long-term investment framework for addressing the region’s challenges. The following are the 2020–2045 RTP/SCS goals:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase person and goods movement and travel choices within the transportation system
5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel

9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats⁸

Please refer to Section VI.I, Land Use and Planning, of this Draft EIR for a detailed discussion of the applicable provisions of the 2020–2045 RTP/SCS that apply to the Project. As demonstrated therein, the Project would be consistent with applicable goals and principles set forth in the 2020–2045 RTP/SCS.

(3) Local

(a) *City of Los Angeles General Plan Framework Element, 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. On August 11, 2015, the City Council adopted the new Mobility Element—Mobility Plan 2035—followed by the August 13, 2015, adoption of the Street Standard Plan/S-470-1 by the City Planning Commission. The City Council subsequently readopted the Mobility Plan 2035 on September 7, 2016. As such, the Mobility Plan 2035 is now in effect. The Mobility Plan 2035 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 2035. Refer to Section IV.I, Land Use, of this Draft EIR for a discussion of the Project’s consistency with the Transportation Chapter of the Framework Element and the Mobility Plan 2035.

(b) *City of Los Angeles 2010 Bicycle Plan*

The City of Los Angeles adopted the 2010 Bicycle Plan (Bicycle Plan) on March 1, 2011. The Bicycle Plan identified a 1,684-mile bikeway system and included a comprehensive collection of programs and policies. It should be noted that the 2010 Bicycle Plan and

⁸ Southern California Association of Governments (SCAG), The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) of the Southern California Association of Governments, Connect SoCal, 2020.

policies have been folded into the Mobility Plan 2035 to reflect a commitment to a balanced, multi-modal viewpoint. The Bicycle Plan programs have been incorporated into Chapter 6: Action Plan of the Mobility Plan 2035.

(c) *Vision Zero*

Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025 (Vision Zero) is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death.⁹ Vision Zero has identified the High Injury Network (HIN), a network of streets based on the collision data from the last 5 years, where strategic investments will have the biggest impact in reducing death and severe injury. The following streets located in proximity to the Project Site have also been identified in the HIN:

- Franklin Avenue
- Hollywood Boulevard
- Sunset Boulevard
- Fountain Avenue
- Santa Monica Boulevard
- Edgemont Street south of Fountain Avenue
- Vermont Avenue

If a proposed project results in significant traffic impacts at intersections located along a designated HIN, LADOT's Vision Zero group will review those specific locations and immediate vicinity for potential safety enhancements that are consistent with the City's Vision Zero initiative.

(d) *Citywide Design Guidelines*

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by 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 were undated in October 2019 and include guidelines pertaining to pedestrian-first design, which serves to reduce VMT.

⁹ City of Los Angeles, Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025, August 2015.

- (e) *City of Los Angeles Municipal Code*
 - (i) *Construction Traffic*

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.

- (ii) *Vermont-Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan*

The Project Site is located within the Vermont-Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan (SNAP). The regulations of the SNAP are in addition to those set forth in the Planning and Zoning provisions of LAMC Chapter 1. As such, the SNAP would prevail over the applicable provisions of the LAMC for setbacks, street dedications, open space, densities, heights, uses, parking, or other development controls if any inconsistency between the SNAP and the LAMC exists.

b) Existing Conditions

- (1) Existing Street System
 - (a) *Streets and Highways*

Figure IV.M-1 provides the Vicinity Map. The existing street system in the study area consists of arterial, collector, and local streets. A description of the existing streets, including number of travel lanes, median type, and speed limit are provided in **Table IV.M-1**.

- (2) Regional Transportation System
 - (a) *Existing Vehicular Access*
 - (i) *Freeways*

Regional vehicular access to the Project Site is provided by the U.S. 101 (Hollywood Freeway).

U.S. 101 is generally a north–south oriented freeway connecting downtown Los Angeles to the San Fernando Valley within the City of Los Angeles. In the Project vicinity, the U.S. 101 alignment runs in a northwest to southeast direction. Four mainline travel lanes are provided in each direction on U.S. 101. Within the general Project area, on-ramps and/or off-ramps are provided at Santa Monica Boulevard and Vermont Avenue for access to and from U.S. 101.

**TABLE IV.M-1
EXISTING ROADWAY DESCRIPTIONS**

Roadway	Classification ¹	Travel Lanes		Median Types ⁴	Speed Limit
		Direction ²	No. Lanes ³		
Serrano Avenue	Local Street	N-S	2	N/A	25
Normandie Avenue	Avenue III	N-S	2	N/A	30
(South of Santa Monica Boulevard)	Avenue III	N-S	3 ⁵	N/A	30
Edgemont Avenue (Los Feliz Boulevard to Santa Monica Boulevard)	Collector Street	N-S	2 ⁶	N/A	25
(Santa Monica to Melrose Avenue)	Local Street	N-S	2 ⁷	N/A	25
Vermont Avenue (Los Feliz Boulevard to Hollywood Boulevard)	Avenue II	N-S	4	N/A	35
(Hollywood Boulevard to Melrose Avenue)	Avenue I	N-S	4 to 6 ^{8,9}	N/A	35
Hillhurst Avenue	Avenue II	N-S	4	N/A	35
Virgil Avenue	Avenue II	N-S	3 to 4	2WLT	35
(South of Melrose Avenue)	Avenue II	N-S	3 ⁷	2WLT	35
Franklin Avenue (West of Normandie Avenue)	Avenue II	E-W	2 to 4 ⁶	2WLT	35
(East of Normandie Avenue)	Avenue III	E-W	2	N/A	30
Hollywood Boulevard	Avenue I	E-W	4	N/A	35
Sunset Boulevard	Avenue I	E-W	6 ^{10, 11}	2WLT	35
Fountain Avenue	Collector Street	E-W	2 ⁶	2WLT	30
Santa Monica Boulevard	Avenue I	E-W	4	2WLT	35
Melrose Avenue (West of Vermont Avenue)	Avenue II	E-W	4 ^{12,13}	2WLT	35
(East of Vermont Avenue)	Avenue III	E-W	4 ^{12,14}	N/A	25

**TABLE IV.M-1
EXISTING ROADWAY DESCRIPTIONS**

Roadway	Classification ¹	Travel Lanes		Median Types ⁴	Speed Limit
		Direction ²	No. Lanes ³		
Rosewood Avenue	Local Street	E-W	2	2WLT/R MI	30
Oakwood Avenue	Local Street	E-W	2	2WLT	25

NOTES:

- ¹ Roadway classifications obtained from the City of Los Angeles Mobility Plan 2035, Adopted January 20, 2016.
- ² Direction of roadways in the Project area: N-S = northbound and southbound; E-W = eastbound and westbound.
- ³ Number of lanes in both directions on the roadway.
Variations in number of travel lanes due to time restricted on-street parallel parking are noted below.
- ⁴ Median type of the road: RMI = Raised Median Island; 2WLT = 2-Way Left-Turn Lane; N/A = Not Applicable.
- ⁵ Tow Away No Stopping 4:00 p.m.- 6:00 p.m. in the northbound direction
- ⁶ Bike Route (Class III).
- ⁷ Bike Lane (Class II).
- ⁸ Tow Away No Stopping between 7:00 a.m.-9:00 a.m. and 4:00 p.m.-7:00 p.m. in the northbound direction.
- ⁹ Tow Away No Stopping between 7:00 a.m.-9:00 a.m. and 4:00 p.m.-7:00 p.m. in the southbound direction
- ¹⁰ Tow Away No Stopping 4:00 p.m.-7:00 p.m. in the eastbound direction
- ¹¹ Tow Away No Stopping 4:00 p.m.-7:00 p.m. in the westbound direction.
- ¹² Tow Away No Stopping between 7:00 a.m.-9:00 a.m. and 4:00 p.m.-6:00 p.m. in the westbound direction.
- ¹³ Tow Away No Stopping between 7:00 a.m.-9:00 a.m. and 3:00 p.m.-7:00 p.m. in the eastbound direction.
- ¹⁴ Tow Away No Stopping between 7:00 a.m.-9:00 a.m. and 4:00 p.m.-6:00 p.m. in the eastbound direction.

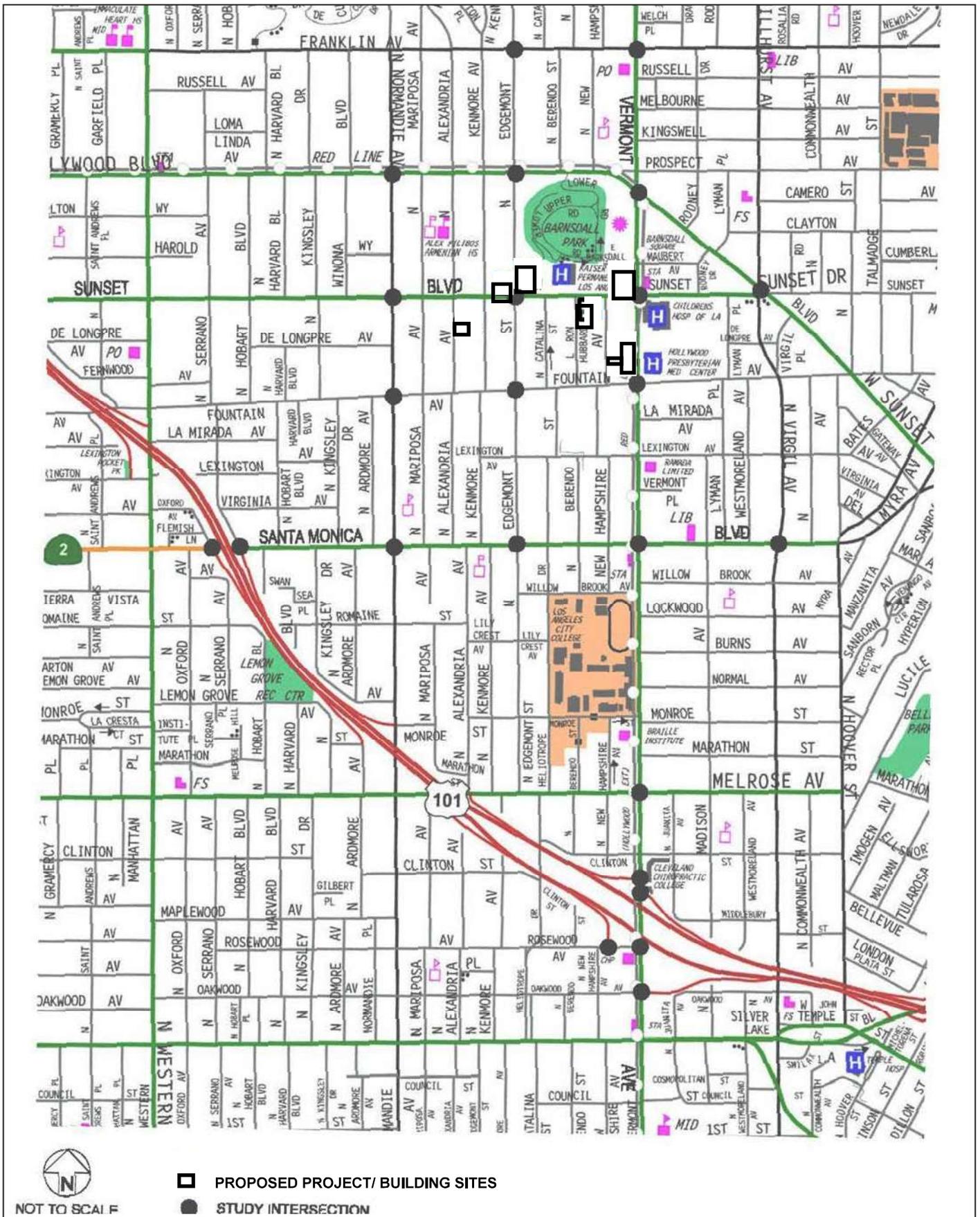
(ii) Roadways

Vehicular access to the Project Site is provided by public roadways traversing the campus. As shown in **Figure IV.M-2**, the key roadways providing vehicular access to the campus parking facilities including the following:

- North–South Roads
 - *Alexandria Avenue* is designated as a Local Street that runs west of the Project Site (Site 6) with one travel lane in each direction. Parking is permitted along both sides of the street near Site 6.
 - *Edgemont Street* is designated as a Collector with one travel lane in each direction and a center left-turn lane that provides access to parking structure north of Sunset Boulevard. Parking is not permitted along this roadway north of Sunset Boulevard near the Project Site. However, it is permitted along both sides of the street south of Sunset Boulevard. There is a bike sharrow (shared lane marking) along Edgemont Street.
 - *L Ron Hubbard Way* is designated as a Local Street that extends between Sunset Boulevard and Fountain Avenue with one travel lane in each direction. Parking is not allowed along either side the street.

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- *New Hampshire Avenue* is designated as a Local Street with one travel lane in each direction. Parking is permitted along both sides of the street.
 - *Vermont Avenue* is designated as an Avenue I with generally two to three travel lanes in each direction. Parking is permitted along both sides of the street. Vermont Avenue has a planned bicycle lane proposed along it per Mobility Plan 2035.
 - East–West Roads
 - *Barnsdall Avenue* is designated as a Local Street with one travel lane in each direction. Parking is allowed along the north side of the street. Barnsdall Avenue transition into a private street that provides access to the existing hospital.
 - *Sunset Boulevard* is designated as a Collector an Avenue I with generally three travel lanes in each direction. Parking is permitted along both sides of the street. Sunset Boulevard has a planned bicycle lane proposed along it per Mobility Plan 2035.

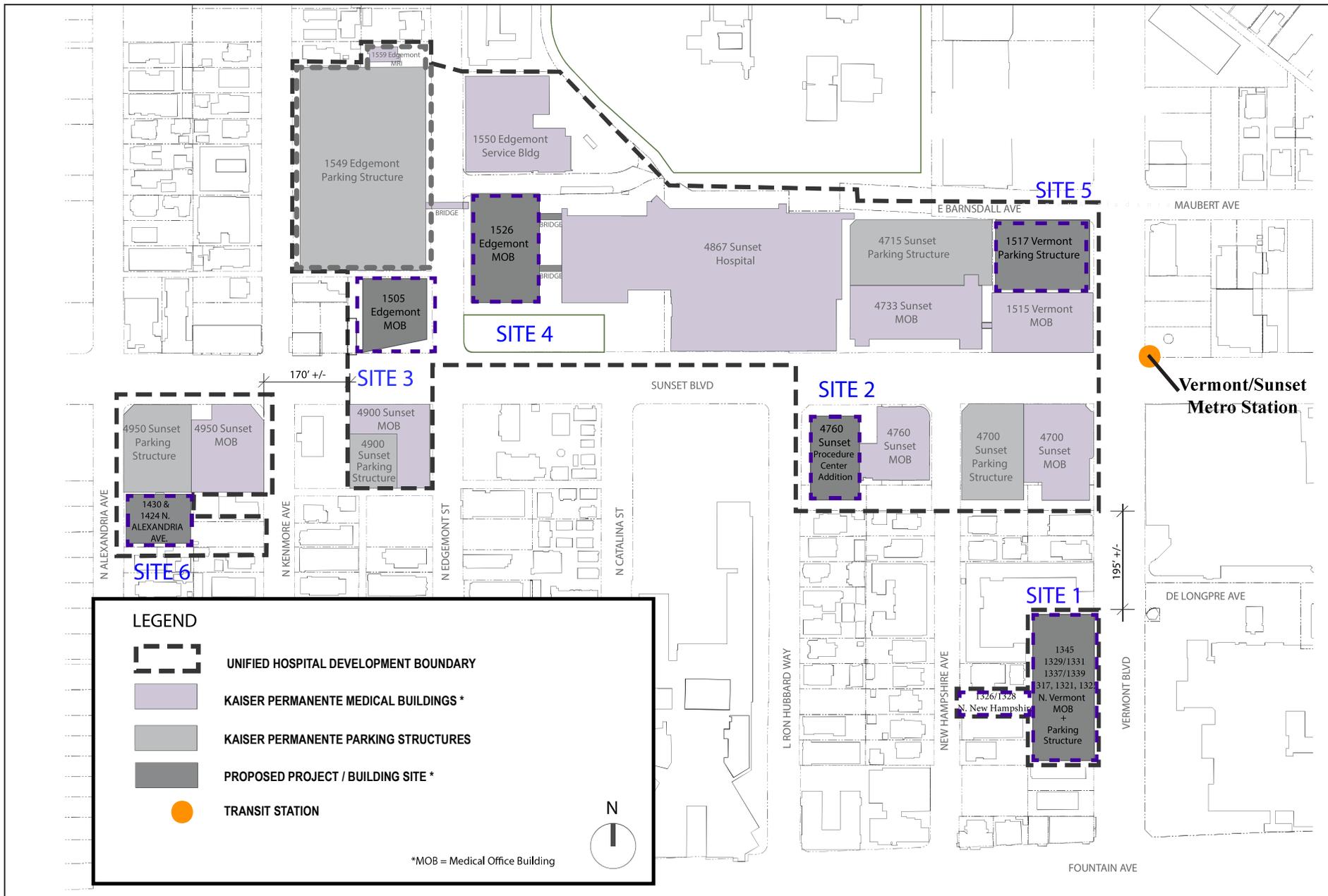
These key roadways provide direct vehicular access to and from the Project's parking facilities. Also, all of the campus-adjacent intersections of the key roadways are traffic-signal controlled. No changes to the Project Site's key access roadways and intersections are planned as part of the proposed Project.



SOURCE: Linscott, Law, & Greenspan 2018

FIGURE IV.M-1
Vicinity Map

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SOURCE: Perkins and Will, 2020

FIGURE IV.M-2
Kaiser Permanente Los Angeles Medical Center Campus and Development Sites

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(b) Public Transit

Public bus transit service within the Project area is provided by Metro and LADOT DASH and Commuter Express Transit Service. A summary of the existing transit service, including the transit route, destinations, and peak-hour headways is presented in **Table IV.M-2**. The existing public transit routes in the Project vicinity are illustrated in **Figure IV.M-3**.

**TABLE IV.M-2
EXISTING TRANSIT ROUTES**

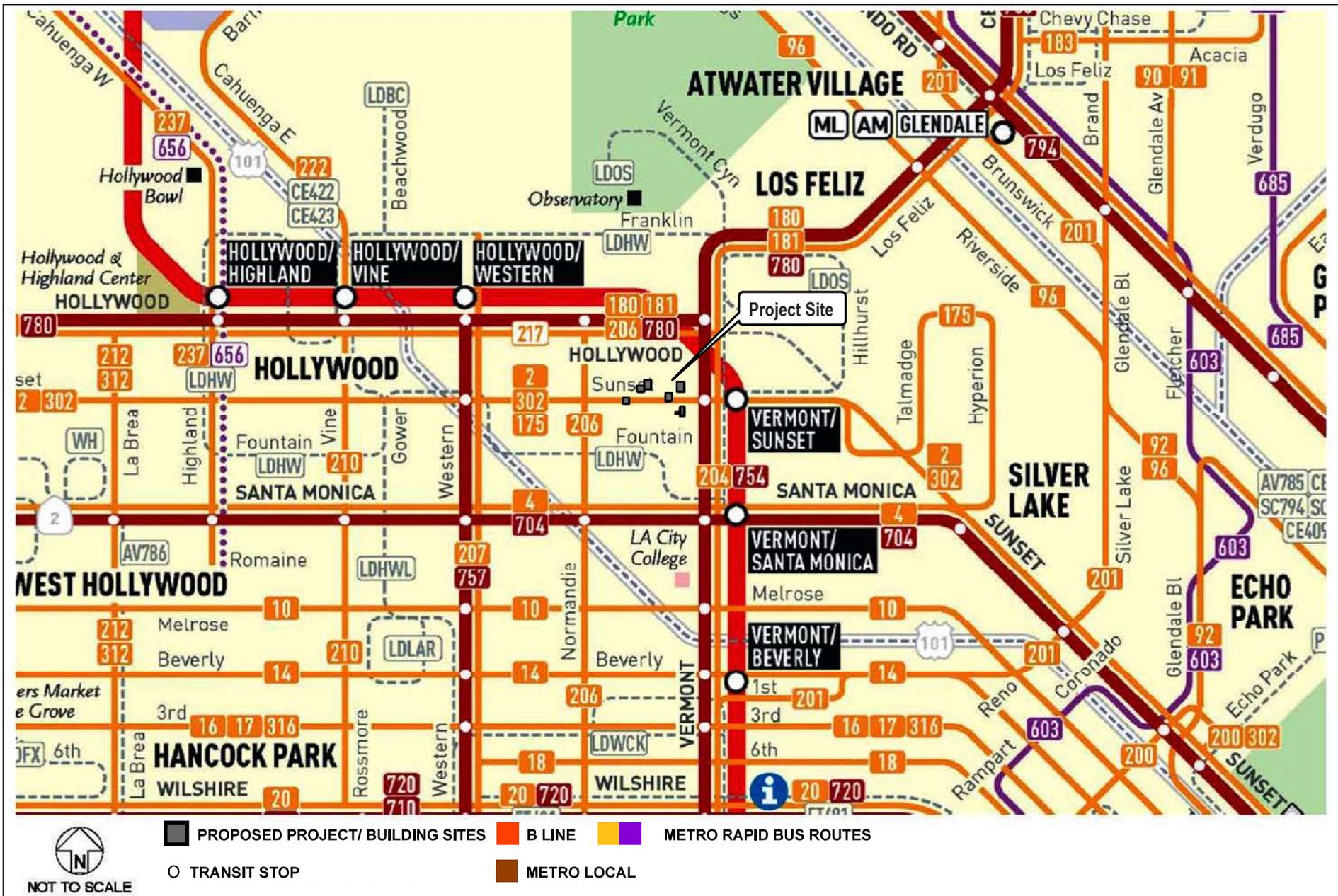
Route	Destinations	Roadways Near Site	No. Of Buses/Trains During Peak Hour		
			DIR	AM	PM
Metro 2/302	Pacific Palisades to Downtown Los Angeles via Westwood, Beverly Hills, Hollywood, Los Angeles, and Echo Park	Sunset Boulevard, Normandie Avenue, Edgemont Street, Vermont Avenue, Hollywood Boulevard	EB	6	11
			WB	14	7
Metro 4	Santa Monica to Downtown Los Angeles via West Los Angeles, West Hollywood, Los Angeles, and Echo Park	Santa Monica Boulevard, Normandie Avenue, Edgemont Street, Vermont Avenue, Virgil Avenue	EB	6	7
			WB	7	5
Metro 10	West Hollywood to Downtown Los Angeles via Los Angeles	Melrose Avenue, Vermont Avenue	EB	8	7
			WB	7	6
Metro 14	Beverly Hills to Downtown Los Angeles via Los Angeles	Beverly Boulevard, Vermont Avenue	EB	13	9
			WB	10	10
Metro 175	Hollywood to Silver Lake via Los Feliz	Sunset Boulevard, Vermont Avenue	EB	4	1
			WB	2	3
Metro 180/181	Altadena to Hollywood via Pasadena, Eagle Rock and Glendale	Hollywood Boulevard, Normandie Avenue, Edgemont Street, Vermont Avenue	EB	4	4
			WB	4	4
Metro 204	Athens to Hollywood via Los Angeles and Koreatown	Vermont Avenue, Hollywood Boulevard,	NB	6	6
		Sunset Boulevard, Fountain Avenue,	SB	6	6
		Santa Monica Boulevard, Melrose Avenue			
Metro 206	Athens to Hollywood via Los Angeles and Koreatown	Normandie Avenue, Vermont Avenue,	NB	6	6

**TABLE IV.M-2
EXISTING TRANSIT ROUTES**

Route	Destinations	Roadways Near Site	No. Of Buses/Trains During Peak Hour		
			DIR	AM	PM
		Santa Monica Boulevard, Fountain Avenue,	SB	6	6
		Sunset Boulevard, Hollywood Boulevard			
Metro 704	Santa Monica to Downtown Los Angeles via West Los Angeles, West Hollywood, Los Angeles and Echo Park	Santa Monica Boulevard, Vermont Avenue	EB	4	6
			WB	7	5
Metro 754	Athens to Hollywood via Vermont Knolls, Los Angeles and Westlake	Vermont Avenue, Sunset Boulevard	NB	11	11
			SB	11	11
Metro 780	Los Angeles to Pasadena via West Hollywood, Hollywood, Glendale and Eagle Rock	Vermont Avenue, Hollywood Boulevard	EB	5	5
			WB	5	5
Metro B Line	North Hollywood to Downtown Los Angeles via Universal City, Hollywood and Los Angeles	Vermont Avenue, Sunset Boulevard	EB	6	6
			WB	6	6
DASH – Hollywood	Hollywood – Circular	Vermont Avenue, Edgemont Avenue, Normandie Avenue, Sunset Boulevard, Fountain Avenue, Santa Monica Boulevard	EB	2	2
			WB	2	2
DASH – Los Feliz	Vermont-Sunset Station to Los Feliz	Vermont Avenue, Franklin Avenue, Sunset Boulevard, Hollywood Boulevard	EB	4	3
			WB	4	3
Commuter Express 422	Thousand Oaks to USC via Agoura Hills, Woodland Hills, Warner Center, Van Nuys, Los Angeles, and Downtown Los Angeles	Vermont Avenue, U.S. 101	NB	4	0
			SB	0	3
Total				180	166

SOURCES: LADOT, DASH Overview, Commuter Express Overview, 2017.

NOTES: EB = eastbound; WB = westbound; SB = southbound; NB = northbound.



SOURCE: Linscott, Law, & Greenspan 2018

FIGURE IV.M-3
Existing Transit Routes

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The Metro B Line is a subway line that provides service through Downtown Los Angeles between Union Station, the Mid-Wilshire area, Hollywood, and the San Fernando Valley. The Metro B Line subway Vermont Sunset station is located at the northeast corner of the Vermont Avenue/Sunset Boulevard intersection. A portal is situated within the Kaiser Permanente campus at the northwest corner of the Vermont Avenue/Sunset Boulevard intersection that connects with the subterranean Metro B Line subway Vermont/Sunset Station. During the weekday AM and PM peak hours, the Metro B Line subway line provides headways of 10 minutes per train (i.e., approximately six Red Line trains) in the northbound and southbound directions.

(c) *Existing Pedestrian and Bicycle Facilities*

(i) *Pedestrian Facilities*

Based on the existing level of pedestrian activity in the area and the proximity of the nearby Metro B Line station, it is anticipated that a high level of pedestrian activity will continue in the area, and to and from the proposed Project Site. The Kaiser Permanente campus is well located to encourage pedestrian activity and walking as a transportation mode. As shown on Figure IV.M-2, walkways for buildings and parking facilities within the Kaiser Permanente campus connect to adjacent sidewalks in a manner that promotes walkability.

In the vicinity of the Project Site, the following signalized intersections provide pedestrian phasing, crosswalk striping, and American with Disabilities Act (ADA) wheelchair ramps:

- North Edgemont Street/Sunset Boulevard
- North Vermont Avenue/Sunset Boulevard
- North Vermont Avenue/Fountain Avenue

A review of the Project Site's pedestrian walkways indicates that the primary characteristics of walkability are accommodated as part of the Project. The Kaiser Permanente campus is situated in the Hollywood community, which is experiencing a considerable amount of new development, including residential, restaurant, and other commercial businesses, fostering and increasing pedestrian activity in the area. Further, as shown on Figure IV.M-3 regional and local public transit stops are provided immediately adjacent to the Project Site on key arterials, which is important in encouraging pedestrian circulation and transit use.

(ii) *Bicycle Facilities*

Bicycle access to the Project Site is facilitated by the City's bicycle roadway network. Existing and proposed bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, Proposed Bicycle Routes, Bicycle Friendly Streets) identified in the City's 2010 Bicycle Plan are, or will be, located within an approximate 1-mile radius of the Project Site.¹⁰ The location of the City's bicycle-enhanced network (low stress network) in close proximity to the Project Site and in the surrounding area is shown in **Figure IV.M-4**. The location of the City's existing and proposed bicycle lane network in close proximity to the Project Site and in the surrounding area is illustrated in **Figure IV.M-5**.

¹⁰ City of Los Angeles, Mobility Plan 2035, 2015, and City of Los Angeles Bicycle Parking Plan, September 7, 2016. As noted in the Mobility Plan 2035, the 2010 Bicycle Plan and policies have been folded into the Mobility Plan 2035 to reflect a commitment to a balanced, multimodal viewpoint.

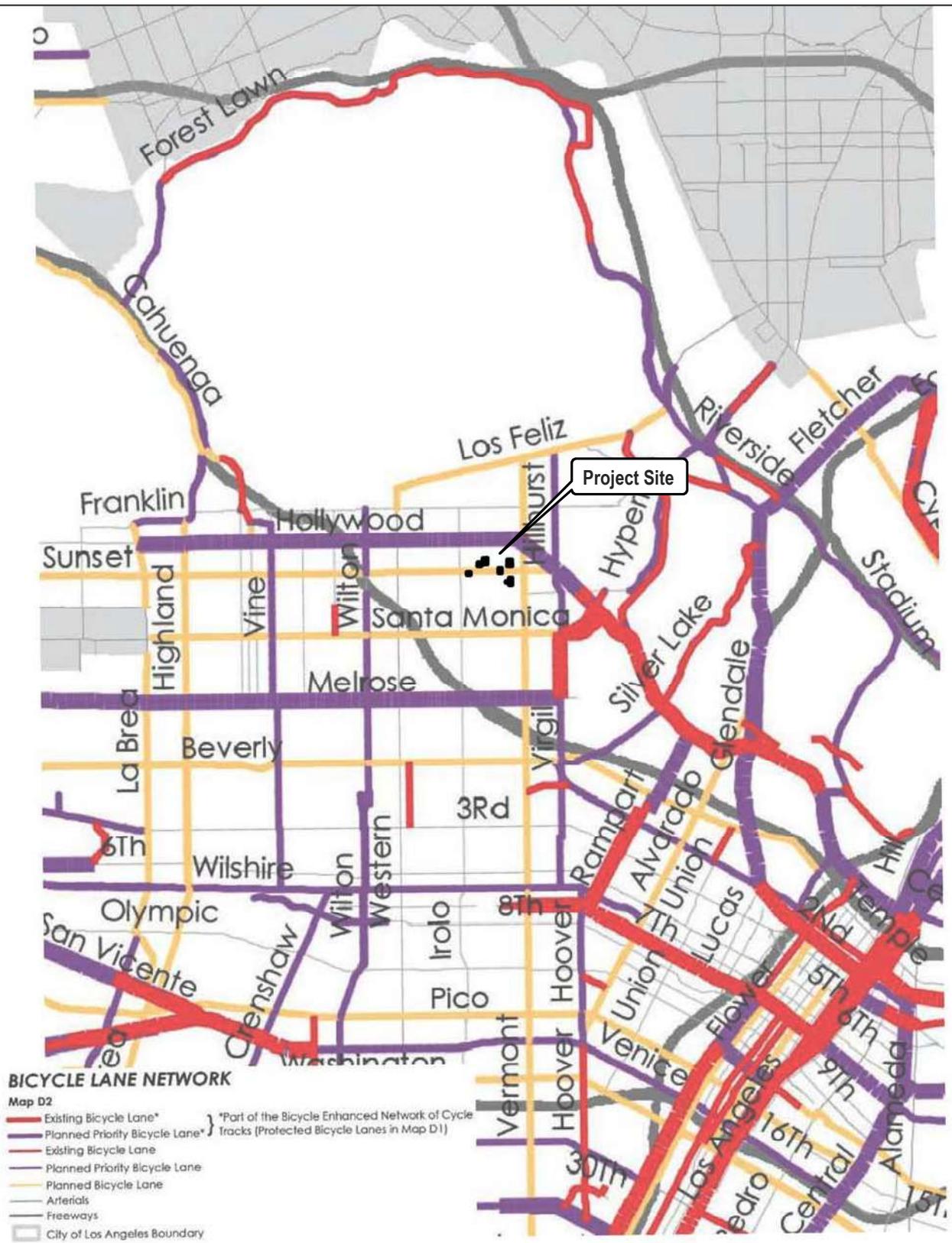


SOURCE: Linscott, Law, & Greenspan 2018

Figure IV.M-4

City of Los Angeles Bicycle Enhanced Network (Low Stress Network)

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SOURCE: Linscott, Law, & Greenspan 2018

Figure IV.M-5
 City of Los Angeles Existing and Proposed Bicycle Land Network

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3. Project Impacts

a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G) and the City's CEQA Transportation Thresholds,¹¹ the Project would have a significant impact related to transportation if it would:

Threshold (a): Conflict with an applicable program, plan, ordinance or policy addressing the circulation system, taking into account all modes of transportation including transit, roadway, bicycle and pedestrian facilities;

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.

In analyzing potential transportation impacts, the City has adopted the thresholds included in its CEQA Transportation Thresholds, which are the same as the impact questions included in Appendix G of the CEQA Guidelines. The City's CEQA Transportation Thresholds, along with the TAG, supersede the guidance and factors included in the City's 2006 L.A. CEQA Thresholds Guide. The impact criteria in the TAG are discussed below. With regard to emergency access, neither the TAG nor the City's CEQA Transportation Thresholds include specific factors or thresholds for determining potentially significant impacts. The methodology discussed below describes the City's standard considerations when assessing emergency access impacts.

As mentioned previously, the City has recently adopted local VMT thresholds to update the State CEQA guidelines for determining transportation impacts. In the course of this update, LADOT has developed a VMT Calculator tool to estimate Project-specific daily household VMT per capita and daily work VMT per employee for land use development projects. This tool is intended to be used for development projects within the City of Los Angeles, and the VMT methodology is tailored to the LADOT TAG.¹²

¹¹ City of Los Angeles, California Environmental Quality Act (CEQA) Transportation Thresholds, July 2019.

¹² LADOT, TAG, Chapter 2, CEQA Analysis of Transportation Impacts, July 2020.

A development project will have a potential transportation impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.
- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

Per the City's methodology for screening and evaluating development projects, the Project would be categorized as an office project. The threshold related to office would thus be utilized to determine the Project's potential impact.

(1) 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. LADOT's TAG identify significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the state's goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. 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 TAG in July 2019 and updated it in July 2020. 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 more than 15 percent below the existing average household VMT per capita for the 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 more 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 identify 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 in which the Project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 6.0 and average work VMT per employee be equal to or lower than 7.6, the Project's overall VMT impact would be less than significant.

b) Methodology

The analysis of potential transportation impacts considers potential Project effects related to (1) potential conflicts with transportation-related plans, ordinances, or policies; (2) a substantial increase in VMT; (3) increased hazards due to a geometric design feature or incompatible use; and (4) emergency access.

(1) Potential Conflicts with Plans, Programs, Ordinances, or Policies

As described above, projects meeting the screening criteria set forth in Section 2.1-2 of the TAG are required to analyze the 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 that focus on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction of VMT. If the Project does not implement a particular program, plan, or policy, it would not necessarily result in a conflict as many of these programs must be implemented by the City itself, over time and a broad area. Rather, the Project would result in a conflict if it would preclude the City from implementing adopted transportation-related programs, plans and policies.

(2) Vehicle Miles Traveled

LADOT developed the VMT Calculator¹³ 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.

(3) Travel Behavior Zone

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through Transportation Demand Management (TDM) strategies. As detailed in the 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.

(4) Mixed-Use Development Methodology

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 (MXD)¹⁴ and considers the following sociodemographic, land use, and built-environment factors for a project area:

- The project's jobs/housing balance
- Land use density of the project

¹³ LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator, Version 1.2, November 2019.

¹⁴ The Mixed-Use Methodology was originally developed by the U.S. Environmental Protection Agency based on a national study of trip generation characteristics of multi-use sites in major metropolitan regions.

- Transportation network connectivity
- Availability of and proximity to transit
- Proximity to retail and other destinations
- Vehicle ownership rates
- Household size

(5) Travel Demand Forecasting

The VMT Calculator determines a Project's VMT based on trip length information from the City's 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.

(6) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study;¹⁵ the 2012 San Diego Association of Governments Activity Based Model¹⁶; Trip Generation, 9th Edition¹⁷; the U.S. Department of Energy, and other modeling resources.¹⁸ A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.¹⁹

¹⁵ Los Angeles Unified School District, 2012 Developer Fee Justification Study, 2012.

¹⁶ San Diego Association of Governments, Activity-Based Model, Calibration and Validation for Base Year 2012

¹⁷ Institute of Transportation Engineers, Trip Generation Manual, 9th edition, 2012.

¹⁸ The 2018 Los Angeles Unified School District Developer Fee Justification Study and Trip Generation, 10th Edition are now available, but City's VMT Calculator used the editions indicated herein.

¹⁹ LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator, Documentation, May 2020.

(7) Transportation Demand Management Measures

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

1. Parking
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 stated in Attachment G of LADOT's TAG, the effectiveness of each of the 23 TDM strategies included in the City's VMT Calculator is based primarily on research documented in the California Air Pollution Control Officers Association (CAPCOA) publication, *Quantifying Greenhouse Gas Mitigation Measures*.²⁰ The selected TDM strategies and the resultant VMT calculator results follow CAPCOA guidance by either directly applying the CAPCOA methodology, applying the alternative literature methodology, or adjusting the methodology offered by CAPCOA to account for local needs and City goals. When more local empirical data are available depending on a project's location, those methods are reflected in the VMT Calculator. TDM strategies can be reviewed in isolation or in combination. While individual VMT reductions can be identified, when used in combination, the VMT reductions are ultimately capped depending on the type of area a project is located within (e.g., for suburban locations, the maximum VMT reduction is capped at 15 percent; for suburban center locations, the maximum VMT reduction is capped at 20 percent). These maximum VMT reductions are described more fully and substantiated in the CAPCOA document referenced above.

²⁰ California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010.

(8) Hazardous Design Features

The Project design, including proposed infrastructure improvements, land uses, and open spaces, will be reviewed to determine if the Project will increase and/or create a hazardous design feature(s) and/or incompatible use.

The LADOT TAG states that the determination of potential impacts related to bicycle, pedestrian, and vehicular safety shall be determined on a case-by-case basis, considering the following factors²¹:

- The relative amount of pedestrian activity at project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facility the project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle or vehicle/vehicle impacts.
- The project location, or project-related changes to the public right-of-way, relative to proximity to the High Injury Network or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

For vehicle, bicycle, and pedestrian safety impacts, review of all project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]). Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), consider operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required.

²¹ LADOT, TAG, p. 2-20, July 2020.

(9) Emergency Access

In consultation with the Los Angeles Fire Department, the analysis of the Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. 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

The following project design features (PDFs) will be incorporated into the Project to reduce potential construction traffic and parking impacts and comply with the City's TDM strategies.

PDF-TRF-1: The following measures shall be implemented as part of the Construction Staging and Traffic Management Plan (CSTMP), to be prepared by Kaiser Permanente:

1. Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on- and off-site locations.
2. Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.
3. Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency.
4. Limit any potential roadway lane closure/s to off-peak travel periods, to the extent feasible.
5. Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation.
6. To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans.

7. Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.
8. Identify and require the routes that construction vehicles would use for the delivery of construction materials (e.g., lumber, tiles, piping, windows), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project.
9. Require Kaiser Permanente to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations.
10. Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by the California Department of Transportation (Caltrans) or City of Los Angeles Department of Transportation (LADOT).
11. Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.
12. Haul trucks entering or exiting public streets shall at all times yield to public traffic.
13. Construction-related parking and staging of vehicles shall occur on site to the extent possible, but may occur on nearby public parking lots, as approved by the City.
14. Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times.
15. Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site.
16. The CSTMP shall meet standards established in the current California Manual on Uniform Traffic Control Device as well as City of Los Angeles requirements.

PDF-TRF-2: The following Transportation Demand Management (TDM) strategies would be implemented to comply with the City's existing Transportation Demand Management and Trip Reduction Measures Ordinance (Ordinance No. 168700):

- Education & Encouragement: Promotions and Marketing (TDM Strategy C)
 - Include voluntary travel behavior change program, such as distributing information through the media, the internet, newsletters, public notices, and the travel feedback program.
 - Include promotion and marketing strategies to influence public attitudes about issues related to transportation and promote a range of travel demand management techniques available to the proposed Project; this could be implemented via an on-site Transportation Information Center. Organizing transit, walk or bike to work events, administrative support for the formation of carpools/vanpools, guaranteed ride home programs for employees, and allowing for flexible and alternative work schedules could be included as these strategies.
- Bicycle Infrastructure (TDM Strategy F):
 - Include Bike Parking Per Los Angeles Municipal Code
 - Include Secure Bike Parking and Showers
- Neighborhood Enhancement: Pedestrian Network Improvements (TDM Strategy G)
 - Include pedestrian network improvements, which may include traffic calming improvements, such as marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, etc.
 - Include applicable pedestrian network improvements that link all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the Project Site.

d) Analysis of Project Impacts

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

(1) Impact Analysis

As examined in the Land Use section of the Draft EIR in detail, the Project is consistent with the following plans addressing the circulation system:

- SCAG 2020–2045 RTP/SCS – The Project’s proximity to the Metro B Line would increase transit accessibility of jobs and services, support use of transit and encourage sustainable land use pattern by redeveloping areas near transit.
- City of Los Angeles General Plan Framework Element – The Project is located in close proximity to the Vermont/Sunset Station and the Sunset/Vermont and the Sunset/Edgemont bus stops. Therefore, it encourages future development in centers and in nodes along corridors that are served by transit.
- City of Los Angeles General Plan Mobility Plan 2035 – The Kaiser Permanente campus is well-located to facilitate pedestrian activity, bicycle usage, and the use of public transit services, particularly due to the proximity of the adjacent Metro B Line Vermont/Sunset Station and nearby commercial corridors. Bicycle access to the Project Site is facilitated by the City’s bicycle roadway network. Existing and proposed bicycle facilities identified in the City’s 2010 Bicycle Plan (included in the Mobility Plan 2035) are, or will be, located within an approximate 1-mile radius of the Project Site.
 - Policy 2.1 Adaptive Reuse of Streets—Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands. The Project will maintain access via driveways and garage entrances after reconstruction and will not alter adjacent streets or the right-of-way in a manner that would preclude or conflict with future changes by various City departments. Therefore, the Project would not conflict with Mobility Plan Policy 2.1.
 - 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. The Project is located in a Pedestrian Enhanced District and would improve pedestrian infrastructure with the addition of new sidewalks around the Project Site perimeter, pedestrian lighting, and within the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

- Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas. With the exception of curbside loading for passengers along the frontage of Site 2 (4760 Sunset Boulevard), the Project does not include any curbside passenger loading zones. The loading docks would be accessed on the Project Site, which would result in a minimal impact on the surrounding street network. Further, the loading docks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.
- Policy 3.5 Multi-Modal Features—Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders. The Project Site is located near Vermont/Sunset Metro Station and several bus stops and is within a high-quality transit corridor. The Project would support multimodal travel with bicycle amenities such as bicycle parking, as well as pedestrian amenities such as walkways within the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 3.5.
- Policy 3.8 Bicycle Parking—Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities. The Project will provide short- and long-term bicycle parking in accordance with LAMC requirements. Therefore, the Project would not conflict with Mobility Plan Policy 3.8. The Project would provide short -and long-term bicycle parking within the proposed parking structures consistent with LAMC requirements. Parking structures are proposed at Site 1 and Site 5. The parking structure at Site 1 would provide 16 short-term and 32 long-term bicycle parking spaces. The parking structure at Site 5 under both Option A and Option B (see Section III, Project Description) would provide 17 short-term and 34 long-term bicycle parking spaces. The parking structure at Site 3 under Option A would provide 4 short-term and 8 long-term bicycle parking spaces, and under Option B would provide 22 short-term and 44 long-term bicycle parking spaces.
- Policy 3.9 Increased Network Access—Discourage the vacation of public rights-of-way. The Project Site is accessed via Collector and Local Streets. The Project Site is also accessible via parking garages and structures as described in detail in the Project Description. The Project will not restrict alley access, nor does it propose vacation of public rights-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 3.9.

- Policy 4.1 New Technologies—Support new technology systems and infrastructure to expand access to transportation choices. The Project does not propose elements that would limit or preclude the City’s ability to offer or introduce new technology systems or infrastructure. Therefore, the Project would not conflict with Mobility Plan Policy 4.1.
- Policy 4.13 Parking and Land Use Management—Balance on-street and off-street parking supply with other transportation and land use objectives. The Project would provide parking within the Project Site in parking structures as described in Chapter III, Project Description. **Table III**, Project Summary Table, in Chapter III, Project Description, provides the details of existing and proposed uses and parking spaces for the Project. The Project would result in a net increase in 1,068 parking spaces at the Medical Center. The Project will also implement a TDM program, as discussed further under Threshold (b), below. This program is intended to reduce vehicle trips. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.
- Policy 5.4 Clean Fuels and Vehicles—Continue to encourage the adoption of low and zero-emission fuel sources, new mobility technologies, and supporting infrastructure. While this is a Citywide policy that does not apply directly to the Project, the Project would not conflict with its implementation. As discussed in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project would comply with the City’s electric vehicle (EV) charging requirements which specify that 6 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV spaces and 10 percent of the total code required parking spaces have EV chargers already installed to immediately accommodate EVs within the parking areas. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.
- Plan for Healthy LA -- As an Element of the General Plan, the Plan for Healthy LA provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City’s future growth and development. The connection between health and mobility has been recognized in the City’s Mobility Plan 2035. The City’s transportation policies and programs are primarily determined and guided by the Mobility Plan 2035, some of which have been described above. Health is a prominent theme in the Mobility Plan 2035, with policies that emphasize active transportation, safety, sustainability, and the environmental effects of transportation. The Plan for a Healthy Los Angeles adds transportation-related policies that focus on active transportation, increasing community access to open space and recreational opportunities, medical care facilities and creating safe passages, which

increases public safety to schools and other community facilities and resources.²² The Project is generally consistent and would not preclude the City from implementing the Framework Element policies and Transportation Element policies that are health-related and are included in the General Plan Health and Wellness Element—The Plan for a Healthy Los Angeles, specifically Appendix 2, Health-related Policies.

- Hollywood Community Plan – The Project Site is located within the Hollywood Community Plan area (Plan Area). The Mobility and Connectivity chapter of the Hollywood Community Plan includes goals and policies that address concerns and ensure a well-functioning mobility system for Hollywood. The plan includes following goals:
 - Goal M.1: Safe, accessible, and convenient mobility options for users of all age and abilities
 - Goal M.2: A transportation system that provides abundant convenient alternatives to single-driver motor vehicles
 - Goal M.3: A world-class transportation system supported by a robust and well-planned capital improvement program
 - Goal M.4: A comprehensive transit system that provides safe and efficient access to, around and from Hollywood that minimizes automobile dependence.
 - Goal M.5: A safe and integrated bicycle network that provides access to transit and key destinations.
 - Goal M.6: A well-managed parking supply where parking resources are used efficiently.

As discussed above, these goals are also consistent with the City's General Plan Mobility Plan. The Project is located near the Vermont/Sunset Station and several bus stops and is within a high-quality transit corridor. The Project would support multimodal travel with bicycle amenities such as bicycle parking, as well as pedestrian amenities such as walkways within the Project Site. The Project would provide parking within the Project Site in parking structures and also implement a TDM program to reduce trips by single-driver motor vehicles. Therefore, the Project would not preclude the City from implementing any goals and policies outlined in the Hollywood Community Plan.

²² Los Angeles Department of City Planning, Plan for a Healthy Los Angeles, March 2015.

- LAMC Section 12.26J (TDM Ordinance) – The Project would include a TDM Program consistent with LAMC Section 12.26J. The details of consistency with the TDM Program are discussed under Threshold b.
- Vision Zero Action Plan – The City’s Vision Zero Task Force has identified streets where investments in safety will have the most impact in reducing severe injuries and traffic fatalities in the City. These roads are collectively known as the HIN. Sunset Boulevard, Vermont Avenue, Fountain Avenue and Edgemont Street in the vicinity of the Project Site are part of the City’s HIN.
 - For Site 1, to access the parking structure, a drive aisle would be established across Site 1, spanning east–west from North Vermont Avenue to North New Hampshire Avenue and providing ingress/egress from driveways on both North Vermont Avenue and North New Hampshire Avenue. A drop-off area and an entrance/exit to the parking structure for vehicular traffic would be situated along the drive aisle inside the building level to avoid conflict with pedestrian movement along Vermont Avenue. Pedestrian entrances to the building would be located near the drop-off area and from the North Vermont Avenue sidewalk.
 - For Site 2, a drive aisle would connect the two existing driveways from L Ron Hubbard Way and North New Hampshire Avenue, and a drop-off area would be established along this drive aisle. The existing pedestrian entrance to the MOB along Sunset Boulevard and at the rear of the building would remain and therefore not result in additional vehicular or pedestrian access requirements or conflicts.
 - For Site 3, a pedestrian entry to the new MOB would be re-established at the southeast corner of North Edgemont Street and Sunset Boulevard.
 - For Site 4, the existing bridge between the MOB at Site 4 and the parking structure to the west across North Edgemont Street would remain in place. Additional pedestrian bridges would be established connecting the new MOB or hospital expansion to the main hospital building. The pedestrian bridges and the pedestrian entry from Edgemont Street would facilitate pedestrian access and reduce conflicts with vehicular traffic.
 - For Site 5, the new parking structure would be connected to an existing Kaiser parking structure to the west (the 4715 Sunset Boulevard parking structure) via openings along the eastern wall of the new structure. Vehicles would enter the new parking structure via the existing entrance to the 4715 Sunset Boulevard parking structure along East Barnsdall Avenue, and would exit via a driveway at Site 5, also along East Barnsdall Avenue. Pedestrian entrances would be provided along North Vermont Avenue and along East Barnsdall Avenue. There would also be an

internal pedestrian connection linking the new parking structure to the MOB that is located to the south of Site 5, at 1515 North Vermont Boulevard.

- For Site 6, an extension of the parking structure to the north, at 4950 West Sunset Boulevard would be added to support 241 parking spaces. The ingress/egress would continue to be provided via the existing driveway along North Alexandria Avenue.

Therefore, as described above, the Project would use existing driveways and alleys for vehicular access, provide ingress/egress drive aisles to parking structures, provide drop-off areas within the building to separate conflicts with vehicles and pedestrian movement along adjacent streets and also include pedestrian bridges for high pedestrian volume areas that connect the parking structures with the main buildings. The Project would not preclude the City from implementing any Vision Zero Action Plan that is developed to reduce collisions and prioritize safety at any of the intersections along the HIN in the vicinity of the Project Site.

- Citywide Design Guidelines – The Citywide Design Guidelines) establish ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Per the LADOT TAG, the following three guidelines from the Citywide Design Guidelines specifically apply to transportation:
 - Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.
 - Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
 - Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

As described in Chapter III, Project Description, of this Draft EIR, the design of the Project Site will facilitate safe and convenient pedestrian and vehicular access to various parts of the Medical Center campus. This would be facilitated by pedestrian access to buildings from sidewalks along public streets and vehicular access via parking structures. Further, as noted above, site-level vehicular access is either provided via secondary streets or alleyways or on-site drive aisles to avoid conflicts with adjacent street vehicular and pedestrian traffic. The Project Site is located along busy streets and public spaces within the Hollywood Community Plan Area and would maintain the human scale along its frontage. Therefore, the Project would not conflict with the Citywide Design Guidelines.

As shown above, the Project would not conflict with the plans and policies included in the Mobility Plan 2035, Plan for a Healthy Los Angeles, Hollywood Community Plan, Vision Zero Action Plan, and the Citywide Design Guidelines. In addition, the Project would include a TDM Program consistent with LAMC Section 12.26J, as well as Mobility Hub elements, such as bicycle parking and EV infrastructure. **Therefore, the Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Impacts would be less than significant.**

(2) Mitigation Measures

As it relates to the Project conflicting with an applicable program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, during construction and operation, impacts would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts related to the Project conflicting with an applicable program, plan, ordinance, or policy addressing the circulation system 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**.

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

(1) Impact Analysis

State CEQA Guidelines Section 15064.3, subdivision (b)(1) for land use projects states that “generally, projects within ½ mile of an existing major transit stop or an existing stop along a high quality transit corridor should be presumed to have a less-than-significant impact on VMT.” Per the Technical Advisory, this presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT. For example, the presumption might not be appropriate if the project:

- Has a floor area ratio less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)

The City of Los Angeles has recently adopted local VMT thresholds for determining transportation impacts.

The VMT analysis has been conducted to identify and evaluate the potential impacts of the proposed Project based on the VMT methodology set forth in LADOT's TAG. According to the TAG,²³ a development project's daily vehicle trips should be estimated using the City's VMT Calculator. In the case of the proposed Project (i.e., a medical office and hospital project with no residential component), the Project will have a potential impact if the Project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the Area Planning Commission (APC) area in which the project is located.

The Project's estimated work VMT is compared to the average daily work VMT per employee for the corresponding APC. Different VMT significance thresholds have been established for each APC boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. The City's significance thresholds (i.e., on both a daily work VMT per employee and work VMT per employee basis) for each of the seven APC boundary areas are presented below in **Table IV.M-3** and in Appendix L-4. As the Project is located in the Central APC, the VMT impact criteria (i.e., 15 percent below APC average) applicable to the proposed Project is 7.6 daily work VMT per employee.

TABLE IV.M-3
CITY OF LOS ANGELES VMT IMPACT CRITERIA

Area Planning Commission	15% below APC Criteria	
	Daily Household VMT Per Capita	Daily Work VMT Per Employee
Central	6.0	7.6
East Los Angeles	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South Los Angeles	6.0	11.6
South Valley	9.4	11.6
West Los Angeles	7.4	11.1

SOURCE: LADOT, TAG, July 2020.

²³ LADOT, TAG, July 2020.

The City of Los Angeles' VMT Calculator was used to estimate the proposed Project's VMT. Based on the Project's location, the calculator uses trip length information obtained from the City's regional TDF Model, which reflects detailed information about the surrounding land uses, travel characteristics, and built environment. The calculator also determines the defined TBZ in which each building site is located. Based on the Project's information (i.e., location, size, and land use mix [existing and/or proposed]), the tool estimates daily vehicle trip generation and daily VMT. The base trip generation is adjusted using Mixed-Use Development Methodology, which relies on socio-demographic and built-environment factors of the Project's surroundings mentioned above to determine the applicable total VMT, household VMT, and work VMT for the project.

For the proposed Project, the address (4867 West Sunset Boulevard) and land use (165,000 square feet of net new medical office) were input into the VMT Calculator. Based on the City's VMT Calculator, the estimated daily work VMT per employee for the proposed Project is 7.4 daily work VMT per employee, which is lower than the Central APC daily work VMT per employee threshold of 7.6 daily work VMT per employee. Thus, a less-than-significant daily work VMT per employee impact is expected. Furthermore, a less-than-significant work VMT per employee impact is expected since the following Transportation Demand Management (TDM) measures required by the City's existing TDM and Trip Reduction Measures Ordinance (i.e., Ordinance No. 168700) and the City's Municipal Code were included as Project Design Feature **PDF-TRF-2**.

PDF-TRF-2: The following Transportation Demand Management (TDM) strategies would be implemented to comply with the City's existing Transportation Demand Management and Trip Reduction Measures Ordinance (Ordinance No. 168700):

- Education & Encouragement: Promotions and Marketing (TDM Strategy C)
 - Include voluntary travel behavior change program, such as distributing information through the media, the internet, newsletters, public notices, and the travel feedback program.
 - Include promotion and marketing strategies to influence public attitudes about issues related to transportation and promote a range of travel demand management techniques available to the proposed Project; this could be implemented via an on-site Transportation Information Center. Organizing transit, walk or bike to work events, administrative support for the formation of carpools/vanpools, guaranteed ride home programs for employees, and allowing for flexible and alternative work schedules could be included as these strategies.

- Bicycle Infrastructure (TDM Strategy F):
 - Include Bike Parking Per Los Angeles Municipal Code
 - Include Secure Bike Parking and Showers
- Neighborhood Enhancement: Pedestrian Network Improvements (TDM Strategy G)
 - Include pedestrian network improvements, which may include traffic calming improvements, such as marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, etc.
 - Include applicable pedestrian network improvements that link all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the Project Site.

As noted above, the proposed Project's daily work VMT per employee is estimated to be 7.4, which is lower than the established threshold of 7.6 daily work VMT per employee for the Central APC. Therefore, impacts related to the Project's potential conflict with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

(2) Mitigation Measures

Impacts related to VMT would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts related to VMT 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.

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)?*

(1) Impact Analysis

The Project would not involve changes to adjacent roadways. Vehicular access to the Kaiser Permanente campus is provided by the key public roadways traversing the campus. Based on a review of the proposed Project driveways associated with the future development sites, none of the new Project driveways are proposed on a major or secondary highway within 150 feet of an intersection with another major or secondary highway. No changes to the campus' key access roadways and intersections are planned as part of the Project. Minor changes will occur at the 1345 North Vermont Avenue Site 1 (under Phase 1) for access to the proposed parking garage at this location.

Based on a review of the proposed Project driveways associated with the future development sites, none of the new Project driveways would intersect an on-street bicycle lane or cross a sidewalk in a high pedestrian area. Additionally, of the proposed Project driveways associated with the future development sites, no readily perceived access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls, or other barriers to adequate lines of sight are present. Therefore, impacts related to an increase in hazards due to a design feature would be less than significant.

(2) Mitigation Measures

As it relates to the Project substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), impacts would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts related to increase in hazards 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**.

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

(1) Impact Analysis

(a) Construction

Construction of the Project may involve activities that would have the potential to impede emergency access, such as temporary closure of travel lanes and generation of

construction traffic. Emergency vehicle access throughout the study area must and will be maintained during the concurrent construction activities associated with several development projects. During the concurrent construction of several development projects, including the proposed Project, it is expected that emergency vehicles will continue to use the surrounding street system (i.e., particularly Vermont Avenue and Sunset Boulevard) even though some travel lanes along certain portions of some roadways may be temporarily used for construction staging and/or material delivery. If required, drivers of emergency vehicles are also trained to use center turn lanes, or travel in opposing through lanes to pass through crowded intersections or streets. Additionally, emergency vehicles can travel through during temporary lane closures because drivers will pull over and let emergency vehicles pass as required by State law. Furthermore, the implementation of Project Design Feature **PDF-TRF-1** would require the preparation of a CSTMP, which would include the provision of any street closure information, a detour plan, haul routes, and a staging plan, as well as formalizing how construction would be carried out and identifying specific actions that would be required to reduce potential emergency access effects on the surrounding community. Therefore, with the implementation of Project Design Feature **PDF-TRF-1**, that includes preparation of a CSTMP, impacts to emergency access during construction would be less than significant.

(b) Operation

All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the proposed Project. Thus, no Project access impacts are anticipated during operation, and the proposed Project would not result in inadequate emergency access.

Therefore, impacts related to inadequate emergency access during construction and operation would be less than significant.

(2) Mitigation Measures

Impacts related to inadequate emergency access during construction and operation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts relating to inadequate emergency access during construction and operation were determined to be **less than significant**. Therefore, no mitigation was required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Impacts to plans and policies related to roadway, transit, pedestrian, and bicycle facilities that were discussed above under Project Impacts would be less than significant. For cumulative analysis, the Project's TIS submitted to LADOT identified approximately 85 related projects within 1.5 miles of the Project Site. The revised LADOT TAG guidelines require related projects within 0.5 miles of a project to be considered in the cumulative analysis. Based on the cumulative analysis, the Project is required to contribute towards Transportation System Improvements (such as traffic signal upgrades), which support the City's mobility objective to avoid creation of conditions that would adversely affect the pedestrian environment, such as longer roadway crossings via roadway widenings. Further, all related projects would be required to comply with the Mobility Plan 2035, Plan for a Healthy Los Angeles, Hollywood Community Plan, Vision Zero Action Plan, and applicable LAMC requirements. All related projects would provide short-term and long-term bicycle parking in accordance with LAMC Section 12.21-A,16(a) and encourage the use of public transit. Therefore, the Project and related projects would not result in a significant cumulative impact with respect to plans and policies related to roadway, transit, pedestrian and bicycle facilities.

Per the LADOT TAG, projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., daily household VMT per capita or daily work VMT per employee) in the project impact analysis are considered to have a less than significant project impact conclusion, which is sufficient in demonstrating there is no short-term cumulative VMT impact. As shown in the discussion under Project Impacts, based on the City's VMT Calculator, the estimated daily work VMT per employee for the proposed Project is 7.4, which would thus result in a less-than-significant work VMT per employee impact. A less-than-significant work VMT per employee impact would result, since the TDM strategies have been included as Project Design Feature **PDF-TRF-2**, as the Project must comply with the City's existing TDM and Trip Reduction Measures Ordinance (i.e., Ordinance No. 168700) and the LAMC as it relates to bicycle requirements. Other related projects in the area that have significant and unavoidable VMT impacts, would also be required to mitigate impacts through TDM program and ordinance. Therefore, the Project's impact would not be cumulatively considerable.

Per TAG, long-term cumulative effects are determined through a consistency check with SCAG's 2020–2045 RTP/SCS, and projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of the RTP/SCS. Since the Project is projected to have a less-than-significant daily work VMT impact, with the implementation of the TDM program required by Project Design Feature **PDF-TRF-2**, the Project would be consistent with the

applicable goals and objectives of the 2020–2045 RTP/SCS to locate jobs in infill locations served by public transportation, facilitating active transportation and TDM measures (refer to Section IV.F, Greenhouse Gas Emissions, and Section IV.I, Land Use, of this Draft EIR for additional consistency analyses with 2020–2045 RTP/SCS). Therefore, the Project would be consistent with the long-term VMT and GHG reduction goals of the 2020–2045 RTP/SCS and, as a result, the Project's contribution to impacts per CEQA Guidelines Section 15064.3(b) would not be cumulatively considerable.

As discussed above, overall the Project would maintain existing access driveways and would not involve changes to adjacent roadways. LADOT has reviewed the Project's site access, circulation, and operational plan to determine if any safety and access enhancements, transit amenities, intersection improvements, traffic signal upgrades, neighborhood traffic calming, or other improvements are needed. The proposed Project has a completed circulation analysis using a LOS methodology that indicates that the trips generated by the proposed development will likely result in adverse circulation conditions at several locations. LADOT has reviewed this analysis and determined that it adequately discloses operational concerns. Physical improvement measures at the Vermont Avenue/Sunset Boulevard intersection were determined infeasible, and the Project would be contributing towards the traffic signal upgrades (totaling approximately \$101,000) at the following intersections:

- Normandie Avenue/Fountain Avenue (Intersection No. 5)
- Alexandria Avenue/Fountain Avenue
- Edgemont Street/Sunset Boulevard (Intersection No. 9)
- Edgemont Street/Fountain Avenue (Intersection No. 10)

These measures would improve safety and operation of the intersections; however, they are not considered to be mitigation measures since they were identified using LOS methodology, which is not considered a transportation impact under CEQA. The proposed Project would comply with improvements identified in the TIS, which would improve the circulation and safety. Additionally, of the proposed Project driveways associated with the future development sites, no readily perceived access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls, or other barriers to adequate lines of sight are present. Therefore, impacts related to an increase in hazards due to a design feature would be less than significant. Furthermore, related projects' 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 proposed Project would not increase hazards due to geometric design

features, and impacts under cumulative conditions would be less than significant. Therefore, cumulative impacts related to an increase in hazards due to a design feature would be less than significant.

The proposed Project is required to prepare a CSTMP for City review and approval. Similar to the proposed Project, the related projects identified in the vicinity of the Project Site area would be required to prepare and implement a CSTMP to address any anticipated temporary lane closures or re-routing of vehicle and bicycle traffic, sidewalk closures or pedestrian re-routing. The preparation of a CSTMP would include the provision of any street closure information, a detour plan, haul routes, and a staging plan, as well as formalizing how construction would be carried out and identifying specific actions that would be required to reduce potential emergency access effects on the surrounding community. Therefore, with the implementation of Project Design Feature **PDF-TRF-1**, which includes preparation of a CSTMP, impacts to emergency access during construction would be less than significant.

All proposed Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the proposed Project. Operation of the proposed Project and other cumulative projects in the area would, thus, not result in inadequate emergency access.

Therefore, as shown above, cumulative transportation impacts would be less than significant.

(2) Mitigation Measures

Cumulative transportation impacts would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative transportation 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.

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