

IV. Environmental Impact Analysis

I. Transportation

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts on transportation. This analysis is based on the *CEQA Thresholds Analysis for the Sunset & Western Project, Hollywood, California* (Transportation Analysis) dated June 22, 2020, prepared by Gibson Transportation Consulting, Inc., pursuant to LADOT's July 2019 *Transportation Assessment Guidelines* (TAG) which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated CEQA guidelines from the State of California that require transportation impacts be evaluated based on vehicle miles traveled (VMT) rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Analysis was approved by LADOT on August 27, 2020. The Transportation Analysis and a copy of LADOT's Assessment Letter are included as Appendix N of this Draft EIR. LADOT also reviewed the *Loading Dock Access Review for the Sunset & Western Project, Hollywood, California* (Loading Dock Memo) prepared by Gibson Transportation Consulting, Inc. on October 14, 2020, and approved by LADOT on October 29, 2020. The Loading Dock Memo and approval by LADOT are included as Appendix O of this Draft EIR. This section also includes background information from the *Transportation Impact Study for the Sunset/Western Mixed-Use Development* dated March 2018 (Traffic Study) prepared by Gibson Transportation Consulting, Inc. prior to the adoption of LADOT's TAG, and provided in Appendix P of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

(a) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which went into effect in January 2014, directing the Governor's Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changed

transportation impact analysis under CEQA. These changes include elimination of automobile delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. 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*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which had been released August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3, discussed further below, which establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts.

SB 743 also added 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.”¹ A “transit priority area” is defined as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”² 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.”³ 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.⁴

¹ PRC Section 21099(d)(1).

² PRC Section 21099(a)(7).

³ PRC Section 21064.3.

⁴ PRC Section 21099(a)(4).

The Project is a mixed-use development that proposes 735 multi-family residential units and up to 95,000 square feet of neighborhood-serving commercial uses, including market, retail, and restaurant uses. These features would be designed to maximize walking, bicycling and the use of transit, and reduce and minimize vehicle trips using a multi-modal transportation strategy. The Project Site is located within 1,500 feet from the Los Angeles County Metropolitan Transit Authority (Metro) B (Red) Line Hollywood/Western station, as well as 12 bus lines, the majority of which provide frequency of service intervals of 15 minutes or less during the A.M. and P.M. peak hours peak commute periods. Therefore, the Project is located in a transit priority area, as defined in PRC Section 21099.⁵ As such, the Project's parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Notwithstanding the provisions of PRC Section 21099, Project parking is still required to meet the vehicle and bicycle parking standards of the Vermont Western Station Neighborhood Area Specific Plan (Specific Plan).

(b) CEQA Guidelines Section 15064.3

As discussed above, recent changes to CEQA include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.⁶ Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.⁷ 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.⁸ A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence.⁹ As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

⁵ *The City's ZIMAS System confirms the location of the Project Site within a Transit Priority Area. See Zoning Information No. 2452 and Parcel Profile Report for 5420 Sunset Boulevard (www.zimas.lacity.org).*

⁶ *CEQA Guidelines Section 15064.3(b)(1)*

⁷ *CEQA Guidelines Section 15064.3(b)(1)*

⁸ *CEQA Guidelines Section 15064.3(b)(4)*

⁹ *CEQA Guidelines Section 15064.3(b)(4)*

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

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

The Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted on April 7, 2016, presented a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2016–2040 RTP/SCS placed an emphasis on sustainability and integrated planning, and identified mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. As part of this approach, the 2016–2040 RTP/SCS included a Sustainable Communities Strategy developed to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing and environmental planning in order to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS). The 2016–2040 RTP/SCS also identified High-Quality Transit Areas (HQTAs), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions were encouraged to focus housing and employment growth within HQTAs.

On September 3, 2020, SCAG's Regional Council adopted its 2020–2045 RTP/SCS, Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045

RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.¹⁰ The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS, the Project would also be consistent with the 2020–2045 RTP/SCS.¹¹ As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project on June 28, 2017, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

(3) Local

(a) City of Los Angeles General Plan Framework Element and Mobility Plan 2035

As an update to the prior Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035 (Mobility Plan) in August 2015. The City Council readopted the Mobility Plan in January 2016 and again in September 2016 upon consideration of additional amendments.¹² The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. The Mobility Plan includes five main goals that define the City’s high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan. Refer to Section IV.E, Land Use, of this Draft EIR for a discussion of the Project’s consistency with the Mobility Plan.

Street classifications are designated in the Transportation Element of the City of Los Angeles General Plan. The Mobility Plan has modified the street standards contained in the Transportation Element in an effort to create a better balance between traffic flow

¹⁰ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

¹¹ *For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within an HQTAs, would include transit-oriented development, and would implement TDM, all of which would reduce the City’s per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City’s existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.*

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

and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Roadways are defined as follows:

- Freeways—High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- Arterial Streets—Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
 - Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:
 - Boulevard I provide up to four travel lanes in each direction with a target operating speed of 40 miles per hour (mph).
 - Boulevard II provide up to three travel lanes in each direction with a target operating speed of 35 mph.
 - Avenues pass through both residential and commercial areas and include three categories:
 - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
 - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
 - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.
- Collector Streets—Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.
- Local Streets—Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local streets can be:
 - Continuous local streets that connect to other streets at both ends, and/or
 - Non-Continuous local streets that lead to a dead-end.

The Mobility Plan designates a citywide network of bicycle lanes (Tier 1, Tier 2, and Tier 3) and bicycle paths for future implementation. Tier 1 Bicycle Lanes are bicycle facilities on arterial roadways with physical separation. Tier 2 and Tier 3 Bicycle Lanes are bicycle facilities on arterial roadways with striped separation. Tier 2 Bicycle Lanes are identified as more likely than Tier 3 Bicycle Lanes to be built by 2035. Bicycle paths are facilities outside of the roadway. Bicycle routes are identified routes for bicycles that are often painted with “sharrow” symbols to alert drivers to bicyclists sharing the roadways. The Mobility Plan also identifies the Neighborhood Enhanced Network, which is defined as bicycle facilities on neighborhood serving streets that provide connections within the protected bicycle lane system.

(b) Community Plan

The City General Plan’s Land Use Element contains 35 community plans that establish specific goals and strategies for the various neighborhoods across Los Angeles. This Project falls within the boundaries of the Hollywood Community Plan (Community Plan). While an update to the Community Plan is currently under development, the current plan remains in effect. Objective 6 of the Community Plan is “to make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.”

(c) Vision Zero

LADOT is implementing a program called Vision Zero. Vision Zero Los Angeles represents a citywide effort to eliminate traffic deaths in the City by 2025. In order to achieve these goals, LADOT identified a network of streets, called the High Injury Network, which has a higher incidence of severe and fatal collisions. The High Injury Network is comprised of 386 corridors that represent 6 percent of the City’s street miles. Approximately 65 percent of all deaths and severe injuries involving people walking and biking occur on these 6 percent of streets. The following streets near the Project Site have been identified in the High Injury Network: Hollywood Boulevard, Sunset Boulevard, Fountain Avenue, Santa Monica Boulevard, Wilton Place between Sunset Boulevard and Santa Monica Boulevard, Western Avenue, and Hobart Boulevard between Sunset Boulevard and Fountain Avenue.

(d) Los Angeles Municipal Code

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.

In addition, LAMC Section 12.37 states that no building or structure shall be erected or enlarged, and no building permit shall be issued therefor, on any lot in an R3 or less restrictive zone; or in any lot in the RD1.5, RD2, or RD3 zones; if the lot abuts a major or secondary highway or collector street unless one half of the street has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

(e) Transit Oriented Community Guidelines

Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22.A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program to encourage affordable housing near transit. The TOC Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program. TOC incentive areas are tiered based on a project site's distance from transit and the type of transit. While the Project Site is located in a Tier 3 TOC because of its proximity to the Hollywood/Western Metro Station, the Project is not seeking incentives under the TOC program. Therefore, the TOC Guidelines do not apply to the Project.

(f) LADOT Manual of Policies and Procedures Section 321

LADOT Manual of Policies and Procedures (MPP) Section 321 provides the basic criteria for review of driveway designs. As discussed in MPP Section 321, the basic principle of driveway location planning is to minimize possible conflicts between users of the parking facility and users of the abutting street system, as well as considering the safety of pedestrians.

b. Existing Street Systems

The existing street system near the Project Site consists of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the study area.

(1) Freeways

The Project Site is located in the Hollywood area of Los Angeles. Primary regional access to the study area is provided by the Hollywood Freeway (US-101). US-101 generally runs in the northwest-southeast direction and is located less than 0.3 mile west of the Project Site. In the vicinity of the study area, US-101 provides four travel lanes in each direction. Access to and from US-101 is available via interchanges at Sunset Boulevard, Western Avenue, Hollywood Boulevard, and Santa Monica Boulevard.

(2) Streets

The roadways adjacent to the Project Site are part of the existing urban roadway network and do not contain hazardous geometric design features, such as sharp curves or dangerous intersections. Listed below are the primary streets that provide local access to the Project Site.

(a) North-South Roadways

- Bronson Avenue—Bronson Avenue is a designated Modified Avenue III in the Mobility Plan. It is located west of the Project Site and provides two 18-foot travel lanes, one lane in each direction, and left-turn lanes at most intersections. Unmetered parking is generally provided on both sides of the street near the Project Site.
- Van Ness Avenue—Van Ness Avenue is a designated Collector Street north of Sunset Boulevard and a Modified Collector Street south of Sunset Boulevard in the Mobility Plan. It is located west of the Project Site and provides two 18- to 20-foot travel lanes, one in each direction. Van Ness is a discontinuous street that is bisected by US-101. Parking is generally provided on both sides of the street near the Project Site.
- Wilton Place—Wilton Place is a designated Modified Avenue III in the Mobility Plan. It is located west of the Project Site and provides three to four 10-foot travel lanes, one to two lanes in each direction, with left-turn lanes at the intersections. Parking is generally available with P.M. peak-hour restrictions on the east side of the street and no peak-hour restrictions on the west side of the street north of Sunset Boulevard. Parking is generally available with peak-hour restrictions on both sides of the street south of Sunset Boulevard.
- St. Andrews Place—St. Andrews Place is a designated Local Street in the Mobility Plan. It is located west of the Project Site and provides two 20-foot travel lanes, one in each direction. Parking is generally available on both sides of the street near the Project Site.
- Western Avenue—Western Avenue is designated as Modified Avenue I in the Mobility Plan. It forms the western boundary of the Project Site and provides four 10- to 18-foot travel lanes, two in each direction, with left-turn lanes at intersections. One-hour unmetered and one-hour metered parking is generally available on both sides of the street near the Project Site.
- Serrano Avenue—Serrano Avenue is a designated Local Street in the Mobility Plan. It forms the eastern boundary of the Project Site and provides two 17-foot travel lanes, one in each direction. Parking is generally available on both sides of the street near the Project Site.

- Normandie Avenue—Normandie Avenue is a designated Modified Avenue III in the Mobility Plan. It is located east of the Project Site and provides two 20-foot travel lanes, one in each direction. Parking is generally available on both sides of the street near the Project Site.

(b) East-West Roadways

- Franklin Avenue—Franklin Avenue is a designated Modified Avenue II in the Mobility Plan. It is located north of the Project Site and provides two to four 10- to 15-foot travel lanes, one to two lanes in each direction, and left-turn lanes at most intersections. Unmetered parking is generally provided on both sides of the street.
- Hollywood Boulevard—Hollywood Boulevard is a designated Avenue I in the Mobility Plan. It is located north of the Project Site and provides four 10- to 18-foot travel lanes, two lanes in each direction, and left-turn lanes at intersections. One-hour metered parking is generally provided on both sides of the street near the Project Site.
- Sunset Boulevard—Sunset Boulevard is a designated Avenue I in the Mobility Plan. It forms the northern boundary of the Project Site and provides six 10- to 15-foot travel lanes, three in each direction, and left-turn lanes at intersections. No parking is generally allowed along the Project Site frontage.
- De Longpre Avenue—De Longpre Avenue is a designated Local Street in the Mobility Plan. It is located west of the Project Site and provides two 18-foot travel lanes, one in each direction. Parking is generally available on the south side of the street west of St. Andrews Place within the study area. A portion near the intersection of Western Avenue and De Longpre Avenue is disrupted by construction in the area and is expected to return to normal when the construction is complete.
- Fountain Avenue—Fountain Avenue is a designated Collector Street in the Mobility Plan. It is located south of the Project Site and provides two 19-foot travel lanes, one in each direction, and left-turn lanes at major intersections. Parking is generally available on both sides of the street near the Project Site.
- Santa Monica Boulevard—Santa Monica Boulevard is a designated Modified Avenue I in the Mobility Plan. It is located south of the Project Site and provides four 10- to 18-foot travel lanes, two in each direction, and left-turn lanes at intersections. One hour metered parking with peak-hour restrictions is generally available on both sides of the street near the Project Site.

(3) Regional Transportation System

(a) Freeways

As discussed above, primary regional access to the Project Site is provided by US-101, which generally runs in a northwest-southeast direction and is located approximately 0.3 mile west of the Project Site. In the vicinity of the Project Site, US-101 provides four travel lanes in each direction. US-101 is accessible via Sunset Boulevard, Western Avenue, Hollywood Boulevard, and Santa Monica Boulevard.

(b) Transit System

The area near the Project Site is well served by public transit, including both bus and rail service. Metro provides several bus lines in the form of both rapid and local bus service, as well as one subway line in the study area. LADOT Downtown Area Shuttle (DASH) and LADOT Commuter Express also provide bus transit service in the area. The following provides a brief description of the bus lines providing service in the Project Site vicinity. For additional information on the transit lines operating near the Project Site, refer to Table 3 of the Traffic Study included as Appendix P of this Draft EIR.

- Metro Local 2—Route 2 is a local line that travels from Downtown to Pacific Palisades via Sunset Boulevard, with average headways of 10 to 14 minutes during the weekday A.M. and P.M. peak hours. This line provides service to Hollywood, West Hollywood, and Westwood and travels along Sunset Boulevard in the vicinity of the Project Site.
- Metro Local 4—Route 4 is a local line that travels from Santa Monica to Downtown via Santa Monica Boulevard, with average headways of 10 to 13 minutes during weekday A.M. and P.M. peak hours. This line provides service to West Los Angeles, West Hollywood, and Echo Park. It travels along Santa Monica Boulevard in the vicinity of the Project Site.
- Metro Local 175—Route 175 is a local line that travels from Silver Lake to Hollywood via Hyperion Avenue and Fountain Avenue, with average headways of 35 to 42 minutes during the weekday A.M. peak hour and 60 to 80 minutes during the weekday P.M. peak hour. This line provides service to Los Feliz and travels along Western Avenue in the vicinity of the Project Site.
- Metro Local 180/181—Route 180/181 is a local line that travels from Hollywood to Altadena via Los Feliz Boulevard and Colorado Boulevard with average headways to 34 to 40 minutes during the weekday A.M. and P.M. peak hours. This line provides service to Pasadena, Eagle Rock, and Glendale and travels along Hollywood Boulevard in the vicinity of the Project Site.

- Metro Local 206—Route 206 is a local line that travels from Hollywood to Athens via Normandie Avenue with average headways of approximately 11 to 13 minutes during the weekday A.M. and P.M. peak hours. This line provides service to the Metro C (Green) Line Crenshaw Station, the Metro D (Purple) Line Wilshire/Western Station, and the Metro B (Red) Line Hollywood/Western Station, and travels along Franklin Avenue and Western Avenue in the vicinity of the Project Site.
- Metro Local 207—Route 207 is a local line that travels from Hollywood to Athens via Western Avenue, with average headways of approximately 12 to 14 minutes during the weekday A.M. and P.M. peak hours. This line provides service to the Metro B (Red) Line Vermont/Sunset Station and the Metro D (Purple) Line Wilshire/Normandie Station, and travels along Western Avenue in the vicinity of the Project Site.
- Metro Limited 302—Route 302 is a limited service line that travels from Downtown to Pacific Palisades via Sunset Boulevard, with average headways of approximately 12 minutes in the westbound direction during the weekday A.M. peak hours and nine minutes in the eastbound direction during the weekday P.M. peak hours. This line provides service to Hollywood, West Hollywood, and Westwood, and travels along Sunset Boulevard in the vicinity of the Project Site.
- Metro Rapid 704—Route 704 is a rapid line that travels from Santa Monica to Downtown via Santa Monica Boulevard, with average headways of 11 to 20 minutes during the weekday A.M. and P.M. peak hours. This line provides service to West Los Angeles, Century City, and West Hollywood, and travels along Santa Monica Boulevard in the vicinity of the Project Site.
- Metro Rapid 757—Route 757 is a rapid line that travels from Hollywood to Hawthorne via Western Avenue, with average headways of approximately 10 to 14 minutes during the weekday A.M. and P.M. peak hours. This line provides service to the Metro C (Green) Line Crenshaw Station, the Metro D (Purple) Line Wilshire/Western Station, and the Metro B (Red) Line Hollywood/Western Station and travels along Western Avenue in the vicinity of the Project Site.
- Metro Rapid 780—Route 780 is a rapid line that travels from Mid City to Pasadena via Hollywood Boulevard in the vicinity of the Project Site, with average headways of approximately 13 to 15 minutes during the weekday A.M. and P.M. peak hours. This line provides service to all Metro B (Red) Line Stations along Hollywood Boulevard.
- LADOT DASH Hollywood—DASH Hollywood is a local line that travels from Argyle Avenue and Hollywood Boulevard to Santa Monica Boulevard and Vermont Avenue via Hollywood Boulevard and Fountain Avenue, with average headways of 30 minutes during the weekday A.M. and P.M. peak hours. This line provides service to the Metro B (Red) Line Vermont/Sunset, Vermont/Santa

Monica, and Hollywood/Vine Stations, and travels along Sunset Boulevard in the vicinity of the Project Site.

- LADOT Commuter Express 422—Route 422 is a commuter express line that travels from Thousand Oaks and Agoura Hills to Downtown, with average headways of 17 minutes during the A.M. peak hours and 21 minutes during the P.M. peak hours. It provides service to Westlake Village, Woodland Hills, and Van Nuys. This line travels along US-101 in the vicinity of the Project Site.

In addition to the above bus lines that currently provide service in the vicinity of the Project Site, Metro operates the B (Red) Line subway near the Project Site with average headways of 10 minutes. The Metro B (Red) Line runs between North Hollywood and Downtown Los Angeles, connecting with the Metro G (Orange) Line in North Hollywood, Metro D (Purple) Line at Wilshire Boulevard, the Metro E (Blue) Line and E (Expo) Line in Downtown, and the Metro L (Gold) Line at Union Station. The closest Metro B (Red) Line station to the Project Site is located at Hollywood Boulevard and Western Avenue, approximately 0.25 mile north of the Project Site. Western Avenue near the Project Site is also identified in the Mobility Plan's Transit Enhanced Network.

c. Existing Project Site Conditions

Parking is currently provided within asphalt paved surface parking areas throughout the Project Site. Vehicular access to the Project Site is currently provided via driveways on Sunset Boulevard, Western Avenue, and Serrano Avenue.

d. Existing Pedestrian and Bicycle Facilities

(1) Pedestrian Facilities

The sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment, providing connectivity to pedestrian crossings at intersections near the Project Site. The intersection of Sunset Boulevard and Western Avenue provides marked pedestrian crosswalks on all four legs of the intersection. The currently unsignalized intersection of Western Avenue and De Longpre Avenue provides a marked pedestrian crosswalk on the south side of the intersection. When signalized under future conditions, this intersection is expected to provide marked pedestrian crosswalks on all legs of the intersection. Each of the intersections near the Project Site provide pedestrian phasing, crosswalk striping, and wheelchair ramps.

(2) Bicycle Facilities

Based on the Mobility Plan, the Bicycle Lane Network consists of Tier 2 and Tier 3 Bicycle Lanes which are facilities on arterial roadways with striped separation. The bicycle facilities described below are provided along corridors near the Project Site:

- Bicycle Lanes (Tier II)
 - Bronson Avenue between Fountain Avenue and Santa Monica Boulevard
- Bicycle Routes (Tier III)
 - Franklin Avenue
 - Fountain Avenue

With respect to bicycle parking, there is one bicycle parking location consisting of a single rack near the bus stop along Sunset Boulevard adjacent to the Project Site. This location is associated with the existing on-site uses.

e. Future Traffic Context

(1) Related Projects

This analysis also considers the effects of other development proposals (related projects) either proposed, approved, or under construction near the Project Site. The list of related projects was compiled based on information obtained from the Department of City Planning and LADOT, as well as recent studies of projects in the area. A total of 100 related development projects were identified in the vicinity of the Project Site, as shown in Figure III-1 and listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. These related projects are projects that are located within an approximately 2-mile radius from the Project Site. Although the buildout years of many of these related projects are uncertain and may well be beyond the Project's buildout year, notwithstanding that some may not be approved or developed, all related projects were considered.

(2) Future Base Transportation System Improvements

(a) *Future Roadway Improvements*

As noted in the Traffic Study included as Appendix P of this Draft EIR, as part of the approved De Longpre Avenue residential project, the signalization of Western Avenue and De Longpre Avenue is proposed. Following the installation of the signal, the intersection will consist of one left-turn lane, two through lanes, and one right-turn lane at the

southbound approach, one left-turn lane, one through lane, and one shared through/right-turn lane at the northbound approach, and one left-turn lane and one right-turn lane at the eastbound approach. Marked pedestrian crosswalks would be provided on all sides of the intersection. This improvement is expected to be implemented within the existing right-of-way and will be completed prior to occupancy of the Project.

(b) City Bicycle Plan

The 2010 Bicycle Plan identifies designated bicycle facilities planned for implementation. Specifically, near the Project Site, future bicycle lanes are identified along Wilton Place, Sunset Boulevard, Fountain Avenue, and Santa Monica Boulevard. Bicycle routes and shared lane bicycle routes are proposed on Van Ness Avenue and St. Andrews Place. As a current schedule for implementation of these bicycle lanes is not available, based on consultation with LADOT, no changes to vehicular lane configurations as a result of potential new bicycle lanes were assumed in this analysis.

(c) Mobility Plan 2035

In the Mobility Plan, the City identifies key corridors of mobility-enhanced networks. Specific improvements in such networks have not yet been identified, and no schedule for implementation has been made available. As such, there have been no changes to vehicular lane configurations as a result of the Mobility Plan.

The components of the 2010 Bicycle Plan have been incorporated into the bicycle network of the Mobility Plan, which consists of a Low-Stress Bikeway System and Backbone Streets. The Low-Stress Bikeway System is comprised of the Bicycle Enhanced Network, the Neighborhood Enhanced Network, and Bicycle Paths. The Bicycle Enhanced Network includes protected bicycle lanes, which could provide infrastructure including cycle tracks, bicycle signals, and demarcated areas to facilitate turns at intersections, and neighborhood streets, which would typically provide mini-roundabouts, cross-street stop signs, crossing islands at major intersection crossings, improved street lighting, bicycle boxes, and bicycle-only left-turn pockets. The Neighborhood Enhanced Network and Bicycle Paths are relatively unchanged from 2010 Bicycle Plan. The Backbone Streets that are not included in the Bicycle Enhanced Network would have bicycle lanes, but not separated cycle tracks. The Backbone Streets include Priority Streets, 460 miles of street to receive bicycle lanes by Year 2035, and Deferred Streets, 195 miles of streets that are not likely to receive lanes before Year 2035.

The following mobility-enhanced networks include corridors in the vicinity of the Project Site:

- **Transit Enhanced Network**—The following corridors were identified as part of a Transit Enhanced Network: Western Avenue, Hollywood Boulevard, and Santa Monica Boulevard.
- **Neighborhood Enhanced Network**—The following corridors were identified as part of a Neighborhood Enhanced Network: Franklin Avenue; Fountain Avenue; Van Ness Avenue; and Wilton Place.
- **Low-Stress Bikeway System**—Hollywood Boulevard as part of the Bicycle Enhanced Network; Van Ness Avenue as part of the Bicycle Enhanced Neighborhood Network and Franklin Avenue; Fountain Avenue, and Wilton Place as part of the Neighborhood Network and Backbone Streets System; Sunset Boulevard as part of the Deferred Streets; and Santa Monica Boulevard as part of the Deferred Streets.
- **Pedestrian Enhanced District**—The following corridors were identified as part of the Pedestrian Enhanced District: Western Avenue, Franklin Avenue, Hollywood Boulevard, Sunset Boulevard, Fountain Avenue, and Santa Monica Boulevard.

3. Project Impacts

a. Thresholds of Significance

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

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

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);

Threshold (d): Result in inadequate emergency access.

As previously discussed, SB 743 (PRC Section 21099(b)(1)) directed OPR to prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within TPAs. The revised guidelines are required to prohibit the consideration of automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised

guidelines, if any. In accordance with this requirement, new CEQA Guidelines Section 15064.3(a), adopted in December 2018, states “a project’s effect on automobile delay does not constitute a significant environmental impact.” As noted above, on July 30, 2019, the City adopted VMT as a criterion in determining transportation impacts under CEQA and LADOT issued guidance on August 9, 2019.

For this analysis the Appendix G Thresholds provided above are relied upon. The analysis utilizes factors and considerations identified in the City’s 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions. The methodology and base assumptions used in this analysis were established by LADOT.

b. Methodology

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

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

(2) Vehicle Miles Traveled

(a) VMT Impact Thresholds

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds. The Transportation Assessment Guidelines 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. Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the Transportation Assessment Guidelines 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 Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee 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 TAG identifies a daily household VMT per capita impact threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6 for the Central APC, 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) VMT Analysis Methodology

LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with the TAG.

(i) 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 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.

(ii) Mixed-Use Development Methodology

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

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

(iii) Travel Demand Forecasting

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

(iv) 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 (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling resources.¹³ A summary of population and employment assumptions for various land uses is provided in Table 1 of the VMT Calculator Documentation.

(v) 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 documented in *Quantifying Greenhouse Gas Mitigation Measures* (California Air Pollution Control Officers Association, 2010).

¹³ *The 2020 LAUSD Developer Fee Justification Study and Trip Generation 10th Edition are now available, but City's VMT Calculator utilized the editions indicated herein.*

(3) Hazardous Geometric Design Features

The TAG includes a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle and pedestrian safety impacts, 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]) are reviewed. Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result are considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. Using this methodology, the Project design, including proposed infrastructure improvements, land uses, and open spaces, are reviewed to determine if the Project would increase and/or create a hazardous geometric design feature(s) and/or incompatible use.

(4) Emergency Access

In consultation with LAFD, the analysis of the Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. 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 Project would implement the following project design features:

TR-PDF-1: The Project will prepare and implement a Transportation Demand Management (TDM) Program consistent with City policies on sustainability and smart growth and with LADOT's trip reduction and multi-modal transportation program. The TDM Program shall include the following measures:

- **Unbundled Parking:** Parking spaces for residents will be leased separately from dwelling units, thereby explicitly exposing residents to the cost of parking and giving them the option not to pay for parking. This measure is designed to reduce auto ownership and encourage the use of alternative modes of transportation;
- **Promotions & Marketing:** Prior to employment and residential lease, employees and residents will be provided with materials and promotions encouraging use of alternative modes of transportation. Verification of material and promotions will be provided prior to approval of building permit. This type of campaign helps to raise

awareness of the options available to people who may never consider any alternatives to driving.

TR-PDF-2: Prior to the start of construction, a detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared by the Applicant and submitted to the Los Angeles Department of Transportation (LADOT) for review and approval. The Construction Traffic Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual (English and Spanish) notification to adjacent property owners and occupants, and nearby schools, of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent residential streets.
- Temporary pedestrian and vehicular traffic controls during all construction activities adjacent to Sunset Boulevard, Western Avenue and Serrano Avenue, to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian safety at the Project Site.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Construction-related vehicles/equipment shall not park on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate, including along all identified Los Angeles Unified School District pedestrian routes to nearby schools.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede nearby school drop-off and pick-up activities.

- Coordination with Metro to address the relocation of the bus stop located at the southeast corner of Sunset Boulevard and Western Avenue adjacent to the Project Site.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Table 2.1-2 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: LAMC Section 12.37; Mobility Plan policies 2.3 through 2.7, 2.10, and 4.15; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced Network, and Bicycle Enhanced Network Programs; Mobility Plan programs PL.1 and PK.10; Transit Oriented Community Guidelines; Vision Zero; and Citywide Design Guideline 2.¹⁴ The Project's potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

(a) Los Angeles Municipal Code

As noted above, LAMC Section 12.37 pertains to development or expansion of buildings along Highways and Collector Streets and associated Dedication and Improvements. Per Table 2.1-2 of the TAG, LAMC Section 12.37 also applies to streets designated Boulevard I, Boulevard II, Avenue I, Avenue II, and Avenue III in the Mobility Plan. Sunset Boulevard is a designated Avenue I, Western Avenue is a designated Modified Avenue I, and Serrano Avenue is a designated Local Street in the Mobility Plan. Per the Mobility Plan, Sunset Boulevard adjacent to the Project Site requires a 35-foot half-width roadway within a 50-foot half-width right-of-way, Western Avenue adjacent to the Project Site requires a 37-foot half-width roadway within a 52-foot half-width right-of-way, and Serrano Avenue adjacent to the Project Site requires a 18-foot half-width roadway within a 30-foot half-width right-of-way. Sunset Boulevard, Western Avenue, and Serrano Avenue would be improved to meet the half right-of-way standards of the Mobility Plan. Thus, the Project would be consistent with the requirements of LAMC Section 12.37.

¹⁴ Table 2.1-2 of the TAG specifically references Citywide Design Guidelines 4.1.01 and 4.1.02. However, the Citywide Design Guidelines were updated in October 2019 and these designations no longer apply. Guidelines 4.1.01 and 4.1.02 are now incorporated into Guideline 2.

(b) *Mobility Plan*

(i) *Mobility Plan Policies 2.3 through 2.7, 2.10, and 4.15*

Policy 2.3 Pedestrian Infrastructure—Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment: Pedestrian access would be maintained on Sunset Boulevard. The Project would incorporate landscaped courtyards within the Project Site, a paved plaza fronting Sunset Boulevard, and landscaped paseos at the ground level that would be publicly accessible to pedestrians and bicyclists from Sunset Boulevard. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service: As detailed in the Traffic Study included as Appendix P of this Draft EIR, the transit system serving the Project Site has available capacity for 5,064 additional person-transit trips during the morning peak hour and 4,356 additional person-transit trips during the afternoon peak hour. The Project would generate approximately 49 net new transit trips during the A.M. peak hour and 55 net new transit trips during the P.M. peak hour, or approximately less than one percent of the available capacity during the A.M. or P.M. peak hours. Furthermore, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress, in 2008 and Measure M, an additional half-cent sales tax increase to fund transportation projects, in 2016. As such, the Project's net increase in transit trips would be partially offset by improvements to transit service in the Project area. Accordingly, the Project would not cause the capacity of the transit system to be substantially exceeded and the Project would not conflict with Mobility Plan Policy 2.5.

Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities: As discussed above, none of the streets adjacent to the Project provide marked bicycle facilities. As part of the Mobility Plan's Bicycle Lane Network (a network of arterial roadways that will receive striping treatments to prioritize bicyclists), Tier 2 Bicycle Lanes are proposed on Sunset Boulevard. Furthermore, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrians. Bicycle parking requirements per LAMC Section 12.21- A,16(a) include short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points and long-term bicycle parking is characterized by an enclosure protecting all sides from

inclement weather and secured from the general public. In accordance with the requirements of LAMC Section 12.21-A, 16(a), the Project would provide 548 bicycle parking spaces, including 76 short-term and 472 long-term bicycle parking spaces. Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

Policy 2.7 Vehicle Network—Provide vehicular access to the regional freeway system: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Primary regional access would continue to be provided by US-101 located approximately 0.3 mile west of the Project Site. Access to and from US-101 is available via an interchange at Sunset Boulevard. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas: Loading areas would be located within the Project Site. As such, delivery trucks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

Policy 4.15 Public Hearing Process—Require a public hearing for the proposed removal of an existing Class II or Class IV bicycle facility: This policy does not apply to the Project because no changes to existing Class II or Class IV bicycle facilities are proposed. While one existing bicycle parking location would be removed as part of the Project, as discussed above under Policy 2.6, the Project would provide 548 bicycle parking spaces in accordance with LAMC requirements. Therefore, the Project would not conflict with Mobility Plan Policy 4.15.

(ii) Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed above in the analyses for Policy 2.5 and 2.6, the Project would not conflict with Mobility Plan policies related to transit and bicycle networks. With respect to pedestrian facilities, pedestrian access would be provided along Western Avenue and Serrano Avenue; however, the primary pedestrian access would be provided via sidewalks along Sunset Boulevard, which, as noted above, has been designated by the Mobility Plan as part of a Pedestrian Enhanced District. Additionally, as noted above, the sidewalks along Western Avenue and Serrano Avenue would be improved to meet City standards. Bicycles would have the same access opportunities as pedestrians and the Project would provide 548 bicycle parking spaces. Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. The Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. Therefore, the Project

would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, or Bicycle Enhanced Network.

(iii) Mobility Plan Programs PL.1 and PK.10

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. Given the Project Site's characteristics, limiting all Project access to non-arterial streets (i.e., Serrano Avenue only) would not be feasible. Vehicular access for both the commercial and residential components of the Project would be provided from Western Avenue via one driveway with two egress lanes and two ingress lanes. Vehicular access for the residential component would also be provided from one driveway along Serrano Avenue, as well as the firelane/driveway which runs through the center of the site. In addition, vehicular access for commercial and guest parking would be provided through a driveway along Sunset Boulevard. In total, while the Project would increase the number of curb cuts on the Project Site from five to seven, the Project would not increase the number of curb cuts along Western Boulevard or Sunset Boulevard, both designated arterial streets, from what is currently provided. Furthermore, as required per LADOT, the new driveway along Western Avenue would be incorporated into the new traffic signal at the intersection of Western Avenue & De Longpre Avenue. All driveways would be improved to limit potential impediments to visibility and minimize potential pedestrian and vehicular conflicts. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PK.10 directs the City to establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. As discussed above, the Project would incorporate landscaped courtyards, a paved plaza fronting Sunset Boulevard, and a landscaped paseo at the ground level that would be publicly accessible to pedestrians and bicyclists from Sunset Boulevard. Therefore, the Project would not conflict with Mobility Plan Program PK.10.

(c) Transit Oriented Community Guidelines

Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22.A.31 was added to create the Transit Oriented Community (TOC). The Transit Oriented Community Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC program. While the Project Site is located in a Tier 3 TOC because of its proximity to the Hollywood/Western Metro Station, the Project is not seeking incentives under the TOC program. Therefore, the TOC Guidelines do not apply to the Project.

(d) *Vision Zero*

Western Avenue and Sunset Boulevard adjacent to the Project Site have been identified as part of the High Injury Network. Sunset Boulevard adjacent to the Project Site has been identified as part of Sunset Boulevard Safety Improvements program, and Western Avenue has been identified as part of the Western Avenue (Lexington to Russell) Safety Improvements program¹⁵. As part of the Western Avenue program, a continental crosswalk was installed across Western Avenue at De Longpre Avenue. However, no other improvements are currently planned along Western Avenue or Sunset Boulevard adjacent to the Project Site. Nevertheless, the Project would not preclude future Vision Zero safety improvements by the City and would improve and widen the sidewalks along Sunset Boulevard and Western Avenue to approximately 15 feet and widen the sidewalk along Serrano Avenue to approximately 12 feet. Thus, the Project would not conflict with Vision Zero.

(e) *Citywide Design Guideline 2*

Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. The Project would provide a pedestrian-focused, mixed-use development with a mixture of retail, restaurant, and housing. The proposed plazas located along the northwest portion of the site would connect to a publicly accessible, privately maintained open space area via a pedestrian paseo that would run north-south through the center of the Project Site. The Project would also include a 30-foot wide firelane/driveway (20 feet for limited vehicle access and 10 feet for pedestrians) through the center of the Project Site. The pedestrian experience would also be enhanced by the 12 foot high ceilings within the paseo, landscaping, contrasting pavement materials, retail and restaurants. The building facades facing the paseo would provide windows, doors and signs at ground level oriented to pedestrian traffic. Heading south along the paseo, pedestrians would be able to access Serrano Avenue to the east or Western Avenue to the west. The Project promotes the safety and comfort of pedestrians. The Project driveways would also provide pedestrian safety enhancements, such as pavement and physical barriers to distinguish between pedestrian and vehicle areas, as well as visual alerts to notify pedestrians of approaching vehicles. In addition, a signalized pedestrian crossing would be provided at the busiest vehicular driveway, the southern driveway along Western Avenue that aligns with De Longpre Avenue. Therefore, the Project would not conflict with Citywide Design Guideline 2 to incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience.

¹⁵ *As part of the Vision Zero program, Sunset Boulevard and Western Avenue were identified as Priority Corridors, where LADOT will prioritize safety improvements, such as minor street crosswalks and continental crosswalks, to reduce traffic-related injuries and fatalities. (Source: LADOT Livable Streets, <https://ladotlivablestreets.org/>).*

(f) Other Programs, Plans, Ordinances, and Policies

The Project would not conflict with the Plan for a Healthy Los Angeles, Land Use Element of the General Plan, Community Plan, Hollywood Redevelopment Plan, Vermont/Western Station Neighborhood Area Specific Plan, LADOT Transportation Technology Strategy, Mobility Hubs Reader's Guide¹⁶, or LADOT Manual of Policies and Procedures. Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing and jobs near transit, as well as its provision of a TDM program, discussed further below. As discussed in detail in Section IV.E, Land Use and Appendix F, Land Use Tables of this Draft EIR, the Project would not conflict with Land Use Element of the General Plan, Community Plan, Specific Plan, or Hollywood Redevelopment Plan policies related to encouraging pedestrian activity and reducing VMT. In addition, the Project would include a TDM Program consistent with LAMC Section 12.26J, bicycle parking consistent with LAMC Section 12.21.A.16, and the Mobility Hub Reader's Guide. The Project would also comply with all applicable LADOT design standards. Therefore, the Project would not conflict with these programs, plans, ordinances, and policies.

(g) Conclusion

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

(2) Mitigation Measures

Project-level impacts with regard to conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, 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)?

¹⁶ *The Mobility Hubs Reader's Guide is meant to provide guidance and inspiration for city staff, property owners, developers, designers, transit agencies, and community members for enhancing project developments and public right-of-way improvements in proximity to existing or new transit stations with amenities, activities, and programs to support multi-modal connectivity and access. Source: Urban Design Studio, Mobility Hubs Reader's Guide, www.urbandesignla.com/resources/MobilityHubsReadersGuide.php, accessed May 4, 2021.*

As discussed in Section 2.2.3, Impact Criteria, of the TAG and Section 3.b, Methodology, above, a development project will have a potential impact if it 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 APC 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.

(1) Impact Analysis

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's four land uses (i.e., residential, market, retail, and restaurant) and their respective sizes as the primary input. Based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 1,656
- Total Employees: 328
- APC: Central
- TBZ: Urban
- Maximum VMT Reduction: 75 percent

The VMT analysis results based on the VMT Calculator are summarized below and detailed in Table 2 and the attachment of the Transportation Analysis included as Appendix N of this Draft EIR.

(a) Commercial VMT

The Project would include up to 95,000 square feet of ground floor commercial uses, including market, retail, and restaurant, that would replace approximately 100,796 square

feet¹⁷ of existing commercial supermarket, shopping center, and fast-food restaurant uses on the Project Site. Thus, the Project would result in a net reduction of 5,800 square feet in retail floor area and would not exceed the LADOT threshold of 50,000 square feet of net retail uses to warrant further VMT analysis. In addition, consistent with the existing uses, the Project does not propose the commercial uses as regionally serving retail uses and, therefore, would not lead to increased VMT. Therefore, the proposed commercial uses of the Project would not generate net new VMT and the Project would not result in a significant work VMT impact.

(b) Household VMT

As part of the Project's design, TDM strategies would be implemented to reduce the number of single occupancy vehicle trips to the Project Site. For the purposes of this analysis, the following TDM strategies were accounted for in the VMT evaluation:

- Reduced Parking Supply: Reduced parking supply to provide less parking than the LAMC requirement without consideration of additional parking reductions mechanisms (i.e., Bicycle Parking Ordinance, Specific Plan, or Enterprise Zone areas, etc.)
- Include Bike Parking per LAMC: Provision of short-term and long-term bicycle parking spaces in accordance with the LAMC.
- Pedestrian Network Improvements: Pedestrian improvements internal to the Project Site that encourage walking and connect to off-site pedestrian facilities.

With the application of these TDM strategies, the VMT Calculator estimates the Project would generate 7,560 total household VMT. Thus, based on the population assumptions above, the Project would generate an average household VMT per capita of 4.6, which is below the significance threshold for the Central APC of 6.0 per capita. Therefore, impacts would be less than significant, and no mitigation measures are required. Nevertheless, as noted above the Project would include Project Design Feature TR-PDF-1 to prepare and implement a TDM program consistent with City policies to further reduce VMT.

¹⁷ *The existing 100,796 square feet of market, retail, and restaurant uses were occupied and operational when traffic data was collected and at the time of the MOU approval (Year 2016). However, approximately 18,525 square feet of retail space has since become vacant. Nonetheless, even with the recent vacancy of the retail space, the net increase in retail floor area at the Project Site would continue to be less than 50,000 square feet. Thus, the conclusions of the analysis would remain unchanged, and the commercial uses would not result in a significant VMT impact.*

(2) Mitigation Measures

Project-level impacts with regard to VMT would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to VMT were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, 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

As previously discussed, pedestrian access to the Project would be provided via landscaped courtyards, a paved plaza fronting Sunset Boulevard, and landscaped paseos at the ground level that would be publicly accessible from Sunset Boulevard.

The Project's primary parking entrance would be off Western Avenue directly opposite the signalized intersection at De Longpre Avenue. There are secondary parking entrances proposed off the east west firelane/driveway in the middle of the site, with right turn in and right turn out on to Western Avenue and right and left turns in and out on Serrano Avenue. There would also be a commercial/guest parking entrance/exit off Sunset Boulevard which leads directly to subterranean parking level P2, and an entrance/exit ramp down to subterranean residential level P2 off Serrano Avenue. It should be noted that the residential/commercial driveway along Western Avenue would be designed to align with the future traffic signal at De Longpre Avenue that would be required by LADOT. The driveway along Sunset Boulevard would provide limited access and accommodate both left- and right-turn ingress and right-turn-only egress maneuvers. The Project driveways would utilize the general location of existing curb cuts and would not introduce new vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts. The driveways would also be improved to meet City standards and would be safely located to provide adequate pedestrian refuge areas and visibility between driveways. In addition, parking garages would be designed to provide adequate reservoir space between each driveway and the first parking space to limit queue spillover into the public right-of-way.

As detailed in the Traffic Study included as Appendix P of this Draft EIR and required by LADOT pursuant to their approval letter dated August 27, 2020, the Project also includes the physical improvement at the intersection of Western Avenue and Sunset

Boulevard that would allow for an additional northbound left-turn lane along Western Avenue approach. The improvement would provide additional queuing area for northbound left-turns and would reduce potential vehicle spillover into the through travel lanes. The Project would provide adequate dedication along Western Avenue to accommodate the proposed improvement as well as a 15-foot sidewalk. Western Avenue and Sunset Boulevard are both identified as part of the High Injury Network as part of the Vision Zero program. In addition, Sunset Boulevard is identified as part of the Bicycle Network and Pedestrian Enhanced Network, and Western Avenue is identified as part of the Pedestrian Enhanced Network in the Mobility Plan. The improvement would be designed to provide safe transitions for vehicles, as well as pedestrians and bicyclists, at the intersection. Neither the proposed improvement measure, nor the Project design, would preclude the City from implementing further improvements along Western Avenue and Sunset Boulevard corridors. **Therefore, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

(2) Mitigation Measures

Project-level impacts with regard to hazardous design features would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the Los Angeles Police Department (LAPD) in the vicinity of the Project Site as a result of construction-related traffic impacts to the surrounding roadways. Pursuant to Project Design Feature TR-PDF-2, a Construction Traffic Management Plan would be prepared and submitted to LADOT for review and approval and would require construction-related traffic to be scheduled outside of commuter peak hours to the extent feasible. Therefore, haul truck trips would occur outside of peak hours (i.e., after 9 A.M., before 3 P.M., and after 6 P.M.) to the extent feasible and no peak-hour construction traffic impacts are expected during the excavation and grading phase of construction.

In addition, while traffic along surrounding roadways would increase with operation of the Project, as discussed above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. 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 Project. **Therefore, the Project would not result in inadequate emergency access, and, as such, impacts to emergency access would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

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

In addition to potential Project-specific impacts, the TAG requires that the Project be reviewed in combination with nearby related projects to determine if there may be a cumulatively significant impact resulting from inconsistency with a particular program, plan, policy, or ordinance. In accordance with the TAG, the cumulative analysis must include consideration of any related projects within 0.25 mile of the Project Site and any transportation system improvements in the vicinity. A list of the related projects located within 0.25 mile of the Project Site, which consist of a mix of residential, hotel, commercial, and office uses, is summarized in Table 1 of the Transportation Assessment included as Appendix N of this Draft EIR. Each of the related projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed by the City, including a check for their consistency with applicable policies. Collectively, the Project and the related projects add high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity.

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

As also discussed above, the Project would result in a less than significant impact with respect to VMT. If any of the related projects result in a significant VMT impact, they would be required to mitigate such impacts through a TDM program to reduce vehicle trips. If there was a cumulative impact as a result of the related projects having significant and unavoidable VMT impacts, the Project's contribution would not be cumulative considerable.

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

Therefore, the Project, together with the related projects within 0.25 mile, would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

(b) Vehicle Miles Traveled

As discussed in the TAG, long-term or cumulative VMT effects are determined through a consistency check with SCAG's 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. As discussed in detail in Section IV.D, Greenhouse Gas Emissions, and Section IV.E, Land Use, of this Draft EIR, the Project would be consistent with both the 2016-2040 and 2020-2045 RTP/SCS. Furthermore, as discussed above, the Project would not result in an increase in work VMT per capita and household VMT per capita would be 4.6, which is below the threshold for the Central APC of 6.0. **Therefore, the Project would be consistent with the long-term VMT and GHG reduction goals of both the 2016-2040 and 2020-2045 RTP/SCS and Project impacts with respect to VMT would be less than significant and, as a result, the Project's contribution to cumulative impacts would not be cumulatively considerable. Thus,**

the Project's cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.

(c) Hazardous Geometric Design Features

As discussed above, Project-level impacts with respect to hazardous geometric design features would be less than significant. The design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by LAFD. The design of related projects would also be reviewed by the LADBS and the LAFD during the City's standard required plan review process to ensure all applicable requirements are met. Moreover, the proposed uses would be similar to and consistent with the surrounding uses. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to hazardous geometric design features would be less than significant.**

(d) Emergency Access

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. Like the Project, the related projects would be anticipated to provide for safe and efficient circulation including adequate sight distances, implement multi-modal transportation strategies to facilitate the dispersal of traffic, and alleviate project-specific traffic access impacts, as appropriate. In addition, as previously discussed, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas, including areas near any temporary travel lane closure(s). Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to emergency access would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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