IV. Environmental Impact Analysis
J. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation, including vehicle miles travelled (VMT). The analysis is based on the 1360 North Vine Street Project Transportation Assessment (Transportation Assessment)[1] prepared for the Project, and included in its entirety in Appendix R of this Draft EIR. The Transportation Assessment was prepared pursuant to LADOT's Transportation Assessment Guidelines (July 2020) which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment was approved by LADOT on December 8, 2021. A copy of LADOT's Assessment Letter for the Transportation Assessment is included as part of Appendix S of this Draft EIR.

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:

- Americans with Disabilities Act of 1990
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code

[1] *Fehr & Peers, 1360 North Vine Street Project Transportation Assessment, November 2021. See Appendix R of this Draft EIR.*

- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Congestion Management Program
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035
- Hollywood Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles

(1) Federal

(a) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

(2) State

(a) Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to

ensure that 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.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

(b) Assembly Bill 32 and Senate Bill 375

With the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing Statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they: (1) are at least 50 percent residential; (2) meet density requirements; and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

(c) California Vehicle Code

The California Vehicle Code (CVC) provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. 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 was released on 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 VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

Based on these changes, on July 30, 2019, the City of Los Angeles City Council 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) in July 2019 and updated in July 2020, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743.

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines 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[2] or a stop along an existing high-quality transit corridor[3] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (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 for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

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[2] *"Major transit stop" is defined in Public Resources Code Section (PRC) 21064.3 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] *"High-quality transit corridors" are defined in PRC Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.*

(3) Regional

(a) Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016–2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs), and Livable Corridors. These areas account for four percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within a 0.5 mile of a major transit stop that is existing or planned. Job centers are defined as areas with significant higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the "Core Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020–2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and

enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a 5-percent reduction in VMT per capita, 9-percent reduction in vehicle hours traveled, and a 2-percent increase in work-related transit trips.

(4) Local

(a) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[4] 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.

Street classifications are designated in the Mobility Plan, and may be amended by a Community Plan, and are intended to create a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows:

- Arterial Streets: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:

[4] *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.*

  - Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.

  - Avenues pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.

- 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.

- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.

  - 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 also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the Bicycle Enhanced Network (BEN), Transit Enhanced Network (TEN), Vehicle Enhanced Network (VEN), and Neighborhood Enhanced Network (NEN). In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts (PED). These networks and PED are defined as follows:

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.

- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.

- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.

- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.

- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

(b) Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses, as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Hollywood Community Plan (Community Plan) area The Community Plan includes the following transportation and circulation objectives that are applicable to the Project:

- Standards and Criteria—Arterials and local streets shall be developed with standards and criteria contained in the Mobility Plan 2035.

- Public Improvements (a)—Continued development of the freeway, arterial, and street system in conformance with the existing and future adopted programs. This should include participation of the City in a regional study focusing on Route 2 capacity increases.

- Public Improvements (b)—Continued planning of and improvements to the public transportation system of the community, including people-mover systems in high intensity areas as well as the proposed Metro Rail System.

- Public Improvements (c)—Preparation of a Hollywood Transportation Plan in ordinance form which creates an integrated program of transportation mitigation measures.

- Public Improvements (d)—Improvement of the Highland/Franklin intersections, including jog elimination either through realignment of Franklin Avenue or through grade separation.

- Public Improvements (e)—Improvement of Fountain Avenue as an east-west arterial, including jog elimination in the vicinity of Le Conte Junior High School.

- Public Improvements (f)—Improvement of the Hollywood Boulevard/La Brea intersection, including jog elimination.

- Public Improvements (g)—Improvement of the Los Feliz Boulevard/Western Avenue intersection, including realignment of the curve.

- Public Improvements (h)—Improvement of Martel Avenue/Vista Street as a north-south arterial, including jog elimination north of Waring Avenue.

(c) Los Angeles Municipal Code

With regard to construction traffic, Los Angeles Municipal Code (LAMC) Section 41.40 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.

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued therefore, on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

With regard to on-site bicycle parking, LAMC Section 12.21 A.16 sets forth requirements for long-term and short-term bicycle parking for residential and commercial buildings. Where there is a combination of uses on a lot, the number of bicycle parking spaces required shall be the sum of the requirements of the various uses. LAMC Section 12.21 A.16 also includes facility requirements, design standards and siting requirements for bicycle parking.

LAMC Section 12.26 J provides for Transportation Demand Management (TDM) and Trip Reduction Measures that are applicable to the construction of new non-residential gross floor area. Different TDM requirements are provided for developments in excess of 25,000 square feet of gross floor area, 50,000 square feet of gross floor area, and 100,000 square feet of gross floor area. The TDM requirements set forth therein vary depending upon the maximum non-residential gross floor area described above, and include measures such as the provision of a bulletin board, display case, or kiosk with transit information and carpool/vanpool parking spaces.

(d) LADOT Transportation Assessment Guidelines

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on VMT, pursuant to State CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates

that implement SB 743. The City established the Transportation Assessment Guidelines (TAG) that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[5]

(e) LADOT Manual of Policies and Procedures Section 321

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

(f) Vision Zero

The Vision Zero Los Angeles program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network, which has a higher incidence of severe and fatal collisions. The High Injury Network, which was last updated in 2018, represents 6 percent of the City's street miles but accounts for approximately two thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

(g) Interim Guidance for Freeway Safety

In May 2020, LADOT issued Interim Guidance for Freeway Safety Analysis (City Freeway Guidance) identifying City requirements for a CEQA safety analysis of Caltrans facilities as part of a transportation assessment. The City Freeway Guidance relates to the

[5] *Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, July 2020.*

identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

(h) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design which serves to reduce VMT.

(i) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[6] The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b. Existing Conditions

(1) Roadway System

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 area.

(a) Freeways

The Project Site is located in the Hollywood area of Los Angeles. Primary regional access to the Project area is provided by the Hollywood Freeway (US-101). US-101 generally runs in a north-south direction east and north of the Project Site and extends from the Los Angeles County border to downtown Los Angeles. In the vicinity of the Project Site, US-101 provides four travel lanes in each direction. Interchanges are provided at

[6] *City of Los Angeles Department of City Planning, Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, 2015.*

Cahuenga Boulevard, Vine Street, Gower Street, Hollywood Boulevard, and Sunset Boulevard in the Study Area. Interstate 10 runs in an east-west direction south of the Project Site and extends from Santa Monica to east of Los Angeles County. South of the Project Site, I-10 provides five lanes in each direction.

(b) Streets

Listed below are the primary streets that provide local access to the Project Site.

(i) North-South Streets

- Wilcox Avenue—Wilcox Avenue is designated as an Avenue III and runs west of the Project Site. Wilcox Avenue provides two lanes in each direction with parking permitted on both sides of the street. Two-way left-turn lanes are provided along portions of Wilcox Avenue, and left-turn channelization is provided at most intersections.

- Cahuenga Boulevard—Cahuenga Boulevard is designated as an Avenue II and runs to the west of the Project Site. Cahuenga Boulevard provides two lanes in each direction with parking permitted on both sides of the street. The portion of Cahuenga Boulevard north of Hollywood Boulevard is included in the Bicycle Enhanced Network in the Mobility Plan.

- Vine Street—Vine Street is designated as an Avenue II in the study area and runs directly west of the Project Site. Vine Street provides two lanes in each direction with parking permitted on both sides of the street. Left-turn channelization is provided at most intersections. Vine Street is included in the Bicycle and Pedestrian Enhanced Networks in the Mobility Plan.

- Gower Street—Gower Street is designated as an Avenue III in the study area. Gower Street provides between one and two lanes of travel in the northbound direction and one lane of travel in the southbound direction. Gower Street is included in the Neighborhood Enhanced Networks in the Mobility Plan.

- North El Centro Avenue—North El Centro Avenue is a local street and runs east of the Project Site. El Centro Avenue provides one lane in each direction with parking permitted on both sides of the street.

(ii) East-West Streets

- Fountain Avenue—Fountain Avenue is designated as a Collector Street and runs south of the Project Site. Fountain Avenue provides one lane in each direction with parking except during street cleaning periods. Fountain Avenue is part of the Neighborhood Enhanced Network in the Mobility Plan.

- Sunset Boulevard—Sunset Boulevard is designated as an Avenue I and runs north of the Project Site. Sunset Boulevard provides two through lanes in each direction. Parking is permitted during off-peak periods. However, during peak periods, parking is restricted on Sunset Boulevard so that additional lanes may be provided, changing the number of lanes from two to three. Left-turn channelization is provided at most intersections. Sunset Boulevard is included in the Vehicle Enhanced Network in the Mobility Plan.

- De Longpre Avenue—De Longpre Avenue is a local street in the study area that runs directly north of the Project Site. De Longpre Avenue provides one lane in each direction with parking permitted on the north side of the street.

- Afton Place—Afton Place is a local street in the study area and runs directly south of the Project Site. Afton Place provides one lane in each direction with parking permitted on both sides of the street.

(2) Transit Service

The Project Site is well served by public transit, including both bus and rail service. Metro provides several bus lines in the form of local bus service and one subway line in the area. LADOT DASH also provides bus transit service in the area. The following provides a brief description of the transit lines providing service in the Project vicinity.[7]

- Metro B Line (Red)—The B Line (Red) is a subway that provides service between North Hollywood and Downtown Los Angeles. This line runs north of the Project Site along Hollywood Boulevard. The B Line (Red) has average headways of 10 minutes during the weekday A.M. and P.M. peak periods. The B Line (Red) Hollywood/Vine station is less than 0.5 mile from the Project Site.

- Metro Line 2—Line 2 provides local service between downtown Los Angeles and the Pacific Palisades neighborhood in Los Angeles. This line has average headways of 10-15 minutes during the weekday A.M. and P.M. peak periods.

- Metro Line 217—Line 217 provides local service between the Westchester neighborhood in Los Angeles and the Hollywood neighborhood in Los Angeles. This line runs north of the Project Site along Hollywood Boulevard. Line 217 has average headways of 15 minutes during the weekday A.M. and P.M. peak periods.

- Metro Line 210—Line 210 provides local service between the Hollywood neighborhood in Los Angeles and Redondo Beach. This line runs west of the Project Site along Vine Street. Line 210 has average headways of 15 minutes during the weekday A.M. and P.M. peak periods.

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[7] *Based on pre-COVID-19 Metro service conditions.*

- Metro Line 4—Line 4 provides local service between Downtown Los Angeles and West Los Angeles, with early morning and late evening service to Santa Monica. The line runs south of the Project Site along Santa Monica Boulevard. Line 4 has average headways of 10-15 minutes.

- Metro Local 180—Line 180 provides local service between Altadena and Hollywood. This line runs north of the Project Site along Hollywood Boulevard. Headways average 15 minutes during peak periods.

- Metro Line 212—Line 212 runs from Hawthorne to Hollywood. This line travels on La Brea Avenue, west of the Project and along Hollywood Boulevard, north of the site. Line 212 has headways of approximately 10 minutes during peak periods.

- Metro Line 222—Line 222 provides local service between Sunland and Hollywood. This line runs north of the Project Site along Hollywood Boulevard, and west of the Project Site along Orange Drive and Highland Avenue. Headways average 60 minutes during peak periods.

- LADOT DASH Hollywood/Wilshire—The Hollywood/Wilshire DASH is a local line that travels from the Metro Purple Line Wilshire/Western Station to the Metro Red Line Hollywood/Vine Station with average headways of approximately 25 to 30 minutes during the weekday A.M. and P.M. peak hours. This line provides service to Koreatown and Hollywood, and travels along Gower Street in the vicinity of the Project Site.

- LADOT DASH Hollywood—The Hollywood DASH provides circulator service in the Hollywood neighborhood in Los Angeles. There are several stops near the Project Site on Hollywood Boulevard, Argyle Avenue (north of Hollywood Boulevard), Gower Street (south of Sunset Boulevard), and Fountain Avenue. The Hollywood DASH has average headways of 30 minutes during the weekday A.M. and P.M. peak periods.

- LADOT DASH Beachwood Canyon—The Beachwood Canyon DASH provides circulator service in Hollywood's Beachwood Canyon neighborhood. There are several stops near the Project Site on Vine Street and Sunset Boulevard. The Beachwood Canyon DASH has average headways of approximately 25 minutes during the weekday A.M. and P.M. peak periods.

(3) Existing Parking and Vehicular Access

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by a mix of uses that consist of a 17,100-square-foot post-production facility, an 8,044-square-foot commercial building, six bungalows that comprise approximately 8,988 square feet of floor area (of which three are vacant and three are occupied by office/post-production uses), and a vacant eight-unit multi-family residential

building comprised of approximately 7,700 square feet of floor area. All existing uses would be removed except the six bungalows, which would be relocated and reused within the Project Site. There are six existing driveways on Afton Place and four existing driveways on De Longpre Avenue that facilitate vehicular access for the existing uses. Approximately 60 surface parking spaces are provided on-site.

(4) Existing Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

The area surrounding the Project Site includes a developed network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features. There are sidewalks lining the streets, crosswalks available at intersections, and shops, restaurants, and other services within walking distance of the Project Site. Sidewalks in the vicinity of the Project Site are approximately 8 to 18 feet wide. In addition, Sunset Boulevard and Vine Street near the Project Site are part of the High Injury Network.

(b) Bicycle Facilities

Within the vicinity of the Project Site, Wilcox Avenue, Selma Avenue, Argyle Avenue, and Fountain Avenue are designated as roadways intended to share the road with bicyclists and provide shared lane markings. These roads are also known as bicycle routes.

The Mobility Plan identifies corridors proposed to receive improved bicycle, pedestrian and vehicle infrastructure improvements. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those which are more likely to be built by 2035. The Neighborhood Enhanced Network is the network of locally-serving streets planned to contain traffic-calming measures that close the gaps between streets containing bicycle facilities. Near the Project Site, planned Tier 1 facilities include Hollywood Boulevard; planned Tier 2 facilities include Vine Street; and planned Tier 3 facilities in the study area include Cahuenga Boulevard, Sunset Boulevard, and Santa Monica Boulevard.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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.

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018, and were subsequently adopted by the City of Los Angeles (City) on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines 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 Guidelines 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. The analysis in this section and the Transportation Assessment, included as Appendix R of this Draft EIR, uses the latest version of the TAG updated by LADOT in 2020.

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

As described above, the CEQA Guidelines' Transportation 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 applicable 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.

(3) Vehicle Miles Traveled

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining

significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds. As discussed above, the *CEQA Transportation Analysis Update* establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG in July 2019. Threshold T-2.1 (Causing Substantial VMT) of the TAG states that a residential project would result in a significant VMT impact if it would generate household VMT per capita higher than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee higher than 15 percent below the existing average work VMT per employee for the APC area in which it's located.

Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT. The TAG identifies a daily household VMT per capita impact threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6 for the Central APC area, 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.

It is important to note that these thresholds—and the VMT analysis to which the thresholds apply—are based on specific types of one-way trips, including:

- Home-Based Work Production: trips to a workplace destination originating from a residential use at the Project Site
- Home-Based Other Production: trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use at the Project Site
- Home-Based Work Attraction: trips to a workplace destination at the Project Site originating from a residential use

The location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of *Technical Advisory on Evaluating Transportation Impacts in CEQA* (California Governor's Office of Planning and Research, December 2018). Therefore, as detailed in *City of Los Angeles VMT Calculator Documentation* (LADOT and LADCP, February 2019) (VMT Calculator Documentation), the City's household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips and the work VMT per employee threshold applies to Home-Based Work Attraction trips.

Other types of trips generated by the Project, including Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use at the Project Site), Home-Based Other Attraction (trips to a non-workplace destination at the Project Site originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination at the Project Site originating from a non-residential use), are not factored into the VMT per capita and VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment.

(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.

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

1. Suburban (Zone 1): Very low-density primarily centered around single-family homes and minimally connected street network.

2. Suburban Center (Zone 2): Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.

3. Compact Infill (Zone 3): Higher density neighborhoods that include multi-story buildings and well-connected streets.

4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network.

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

As detailed in 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 location's jobs/housing balance, which factors into how many trips are local or internal to a mixed use project

- Land use density where the project is located, which factors into the likelihood of short trips, as well as walking and bicycling

- Transportation network density, which affects the circuity of travel (whether driving, walking, or bicycling) and, therefore, affects both trip length and the likelihood of choosing non-automobile modes of travel

- Proximity to transit, which affects the likelihood that residents or employees will travel via transit rather than automobile

- Proximity to retail and other destinations, affecting the likelihood that residents or employees will take short trips or non-automobile modes for routine commercial activities

- Vehicle ownership rates, with higher levels of vehicle ownership leading to a higher rate of automobile trips

- Household size, which affects both the number of trips made by a given residential unit (increasing or decreasing overall VMT) and also affects the number of people when calculating the daily VMT per capita

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.

The VMT Calculator contains population assumptions based on Census data 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. A summary of population and employment assumptions for various land uses is provided in Table 1 of *City of Los Angeles VMT Calculator Documentation.*

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

1. Parking

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).

(c) Regional Serving Retail VMT

The Residential Option is the only Project Option that includes retail/restaurant uses that exceed the 50,000-square-foot threshold identified in the TAG between local-serving and regional-serving retail. Since the retail and restaurant components of the Residential Option are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model. A regional-serving retail project would result in a significant VMT impact if it would result in a net increase in total daily VMT.

Fehr & Peers ran the City of Los Angeles' citywide travel demand forecasting model in addition to the VMT Calculator because the Residential Option's proposed retail/restaurant uses total more than 50,000 square feet and therefore could be considered regional serving. Since the overall number of trips in the citywide model is based on home-based trips and is balanced to home-trip productions, the total number of trips across the entire network would not be influenced materially by the introduction of the additional retail space but rather the model would redistribute home-shopping trips from other retail destinations to the proposed retail destination. This consisted of the following steps:

- The model traffic analysis zone (TAZ) in which the Project is located was determined.

- The Residential Option land uses were converted into the appropriate socioeconomic categories utilized in the model. The socioeconomic parameters in the TAZ were adjusted appropriately to reflect removal of the existing land uses and addition of the Residential Option land uses.

- The model process was run for the model existing base year for the four time periods in the model (A.M. peak period, midday period, P.M. peak period, nighttime period) for the following scenarios:

  - "Without Project retail" scenario, including all the Project Residential Option's non-retail land uses;

  - "With Project retail" scenario, adding the Residential Option's proposed retail and restaurant uses.

- All VMT on the model network focus area was calculated for each of the four time periods and summed to determine the estimated daily VMT for each scenario. The daily VMT for the "without Project retail" scenario was subtracted from the daily VMT for the "with Project retail" scenario to determine the net change in daily VMT caused by the Project retail uses.

(4) Hazardous Geometric Design Features

The TAG include 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.

(5) Freeway Safety Analysis

Based on the City Freeway Guidance, a transportation assessment for a development project should include analysis of nearby freeway off-ramps serving a project site where a project adds 25 or more morning or afternoon peak-hour trips. A project would result in a significant impact at such a ramp if each of the following three criteria were met:

1. Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes.

2. The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.

3. The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 miles per hour (mph).

If a potential safety issue is identified, then, to offset this potential condition, a project should consider preferred corrective measures, including TDM strategies, to reduce the project's trip generation, investments in active transportation or transit system infrastructure to reduce the project's trip generation, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to demonstrate substantial safety benefits, not be a VMT-inducing improvement, and not result in environmental impacts.

(6) Emergency Access

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

c. Project Design Features

The Project would implement the following project design feature associated with construction activities:

Project Design Feature TR-PDF-1: At the exit of the subterranean parking garage, the Project will implement blind spot mirrors to improve driver visibility and warning sounds/lights to alert pedestrians of approaching vehicles.

Project Design Feature TR-PDF-2: Prior to the start of construction, the Project Applicant will prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- Provide off-site truck staging in a permitted area furnished by the construction truck contractor.
- Truck access to the Project Site will be off Vine Street;
- Establish requirements for loading/unloading and storage of materials on the Project Site where parking spaces would be encumbered;

- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods;
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. This information will clearly state that no construction worker parking is permitted on residential streets
- During construction activities when construction worker parking cannot be accommodated on the Project Site, the plan shall identify alternate parking location(s) for construction workers and the method of transportation to and from the Project Site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction;
- Worksite Traffic Control Plan(s), approved by LADOT, will be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Maintain access for the surrounding uses in proximity to the Project Site during construction and post a hotline in several areas around the Site to enable the public to call and report non-compliance with the Construction Traffic Management Plan ;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences;

Project Design Feature TR-PDF-3: The Applicant will work with the City of Los Angeles, Council District 13, and neighborhood residents living on Afton Place and De Longpre Avenue between Vine Street and El Centro Avenue to fund the development and implementation of a traffic calming plan to minimize cut-through traffic on these streets. Traffic calming measures could involve physical measures such as changes in street alignment, installation of barriers, speed humps, speed tables, raised crosswalks, chicanes, chokers, and street closures and/or operational measures such as turn restrictions, speed limits, and installation of stop signs, as approved by LADOT. The total cost of such measures shall not exceed $100,000. The Applicant shall install such measures, as approved by LADOT Hollywood/Wilshire District Office, within 5 years of final Project approval.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development options—the Residential Option and the Office Option.

The Residential Option would develop a new high-rise building with four levels of subterranean parking consisting of up to 429 new residential units, including 36 units designated for Very Low Income households, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or 12 residential units, in which case the development would still propose a total of 429 residential units.

The Office Option would develop a new high-rise building with eight levels of subterranean parking with approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses in the proposed building, as well as 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or nine residential units.

As shown in Figure II-8, Residential Option Conceptual Ground Floor Plan, in Section II, Project Description of this Draft EIR and in Figure 2A of the Transportation Assessment included as Appendix R of this Draft EIR, access for the proposed uses of the Residential Option would be provided via a right-in/right-out driveway on Vine Street and a two-way all-way access driveway on De Longpre Avenue. Both driveways would provide access to the subterranean parking garage. The commercial and/or residential truck loading docks would be adjacent to the De Longpre Avenue driveway. No vehicular access off of Afton Place is proposed for the Residential Option.

Vehicle access for the proposed uses of the Office Option would be provided via three driveway scenarios: (1) a right-in/right-out driveway on Vine Street and a two-way all-way access driveway on De Longpre Avenue; (2) all-access driveways on Afton Place and De Longpre Avenue; or (3) all-access driveways on Afton Place and De Longpre Avenue with an added cul-de-sac (i.e., street closure to through traffic) directly east of the driveway on Afton Place. Under the Office Option, all driveways would provide access to the subterranean parking garage, and the loading dock would be located adjacent to the De Longpre driveway. Office Option driveway scenarios 1, 2, and 3 are shown on Figures II-10 through II-12 in Section II, Project Description, of this Draft EIR and in Figures 2B through 2D in the Transportation Assessment included as Appendix R of this Draft EIR.

The following analysis accounts for all development options and scenarios and the term “Project” refers to all such options and scenarios unless stated otherwise.

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

Attachment D of the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following have been assessed for the Project: the Mobility Plan; LADOT Manual of Policies and Procedures Section 321; LAMC; Hollywood Community Plan; and the Hollywood Redevelopment Plan. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

(a) Mobility Plan 2035

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 would 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 Mobility Plan identifies Pedestrian Enhanced Districts where initial analysis suggests arterials can be improved and further analysis and prioritization will occur as funding and projects become available. The Project frontage along Vine Street is part of the PED, and the Project would not narrow or remove pedestrian facilities. The Project's Residential Option would provide a north-south pedestrian paseo through the Project Site that would connect De Longpre Avenue and Afton Place, further adding to pedestrian accessibility in the area. 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.

The Neighborhood Enhanced Network is a selection of local streets to provide comfortable and safe routes for localized travel of slower-moving modes, such as walking or biking. The Project Site is not located immediately adjacent to street segments of the Neighborhood Enhanced Network. 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.

This policy identifies specific streets as part of the Transit Enhanced Network to receive improvements that enhance the performance and reliability of existing and future bus service. The Project Site is not immediately adjacent to any Transit Enhanced Streets. Therefore, 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.

This policy establishes a Bicycle Enhanced Network, which is comprised of protected bicycle lanes and bicycle paths, to provide bikeways for a variety of users. The Project frontage along Vine Street is part of the Bicycle Enhanced Network. As previously described, the Project driveway options include a driveway on Vine Street that would be right-in/right-out, which is intended to reduce conflicts between vehicles entering and exiting the driveway and bicyclists traveling northbound on Vine Street. The Project would not preclude bicycle enhancements to the public right-of-way that the City may pursue. 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 policy establishes a Vehicle Enhanced Network to identify corridors that will remain critical to vehicular circulation and to balance regional and local circulation needs. The Project frontages are not along streets that are part of the Vehicle Enhanced Network. 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.

The Project would provide an off-street loading dock adjacent to the proposed De Longpre Avenue driveway. As such, truck loading activities would result in a minimal impact on the surrounding street network and 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 2.17 Street Widenings—Carefully consider the overall implications (cost, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.

Street widenings should be carefully considered as they can impact the cost, character, safety, and environment of a street segment. The Project would dedicate 5 feet of right-of-way along the De Longpre Avenue and Afton Place frontages to conform with the

street classifications in the Mobility Plan but would not widen these streets. Therefore, the Project would not conflict with Mobility Plan Policy 2.17.

Policy 3.2 People with Disabilities—Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

The Project would retain and would not modify the existing sidewalks. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.

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.

Depending on the local context, various multimodal features may be considered to encourage walking and/or assist in making first/last mile connections with transit. The Project would support multi-modal travel with bike parking and by concentrating mixed-use development near public transit. 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 would provide and locate on-site bicycle parking in accordance with LAMC requirements and the City's Bicycle Parking Ordinance. The Residential Option would provide 269 bicycle parking spaces (53 short-term and 216 long-term). The Office Option with bungalows as restaurants would provide the required 160 bicycle parking spaces (57 short-term and 103 long-term), and the Office Option with bungalows as residential units would provide the required 162 bicycle parking spaces (54 short-term and 108 long-term). Therefore, the Project would not conflict with Mobility Plan Policy 3.8.

Policy 3.10 Cul-de-sacs—Discourage the use of cul-de-sacs that do not provide access for active transportation options.

As previously discussed, the Office Option may provide allow vehicle access via all-access driveways on Afton Place and De Longpre Avenue with an added cul-de-sac directly east of the driveway on Afton Place. All driveways would provide access to the subterranean parking garage. The Afton Place cul-de-sac would maintain bicyclist and pedestrian access. Therefore, the Project would not conflict with Mobility Plan Policy 3.10.

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. 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 objective of this policy is to balance parking supply with other transportation and land use objectives. The policy states that an oversupply of parking can undermine broader regional goals of creating vibrant public spaces and a robust multi-modal transportation system, an abundance of free parking incentivizes automobile trips and makes alternative modes of transportation less attractive, and that large parking lots consume land that could be used for other valuable uses and discourage walking by increasing the distance between services and facilities.

Based on LAMC requirements and in accordance with City Ordinance No. 185,480, if developed with restaurants within the bungalows, the Residential Option would be required to provide 689 vehicle parking spaces (568 residential and 121 commercial vehicle parking spaces. If developed with residential units within the bungalows, the Residential Option would be required to provide 673 vehicle parking spaces (568 residential and 105 commercial vehicle parking spaces) within the proposed four subterranean levels. Overall, the Residential Option would comply with the above requirements by providing a total of 764 vehicle parking spaces (598 residential and 166 commercial vehicle parking spaces) within the four subterranean levels.

If developed with restaurants within the bungalows, the Office Option would be required to provide 969 vehicular parking spaces (927 office and 42 restaurant vehicle parking spaces) and would provide 1,693 vehicle parking spaces (1,651 office and 42 restaurant vehicle parking spaces). If developed with residential units, the Office Option would be required to provide 969 vehicular parking spaces (927 office, 24 restaurant, and 18 residential vehicle parking spaces) and would provide 1,699 vehicle parking spaces (1,651 office, 24 restaurant, and 18 residential vehicle parking spaces).

The Project would not conflict with the portion of Policy 4.13 that discourages utilizing land for parking that could have been used for other valuable uses since all parking will be located in a subterranean garage. Moreover, residents, employees, and visitors will have to pay for parking; therefore, the Project does not conflict with the policy regarding the abundance of free parking.

While the Project would include parking in excess of the LAMC minimum requirements, it would include features to encourage walking and bicycling and LAMC-required bicycle parking spaces. Furthermore, as discussed above the Project

would be consistent with the applicable goals and objectives of the SCAG 2016–2040 RTP/SCS and 2020–2045 RTP/SCS to locate jobs and housing in infill locations served by public transportation. Therefore, the Project would not undermine broader regional goals of creating vibrant public spaces and a robust multi-modal transportation system.

Under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Therefore, even though the Project's parking may exceed the LAMC's minimum requirements, the Project is consistent with the overall intent of Policy 4.13 and the Mobility Plan.

Moreover, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and the inconsistency itself would result in a direct physical impact on the environment. The above policy is intended to implement broader regional goals, not to mitigate an environmental effect. Therefore, even if the Project's amount of parking was conservatively considered to be inconsistent with Policy 4.13, such inconsistency would not be considered to be a significant impact under CEQA.

Policy 5.1 Sustainable Transportation—Encourage the development of a sustainable transportation system that promotes environmental and public health.

As discussed with the policies above, the Project would encourage the development of a sustainable transportation system with its provision of bicycle parking, maintenance of existing wide sidewalks, proposed north-south paseo, and proposed mixed-use development near transit. Therefore, the Project would not conflict with Mobility Plan Policy 5.1.

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.

As required by the City of Los Angeles Ordinance 186485 and Ordinance 186488, 30 percent of the Project's parking spaces would be capable of supporting future electric vehicle supply equipment, and 10 percent of spaces would have electric vehicle charging stations. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.

Policy 5.5 Green Streets—Maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way.

The Project would implement a Stormwater Pollution Prevention Plan (SWPPP) during construction as required under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The Project would implement best management practices (BMPs), including erosion control, sediment control, non-stormwater management, and materials management measures, to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would implement Low Impact Development (LID) strategies, including Capture and Reuse cisterns, in accordance with the current City of Los Angeles LID Ordinance requirements. Additionally, the Project would provide street trees to further capture and infiltrate stormwater within the City's public rights-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 5.5.

> *Program ENG.19 First Mile/Last Mile Transit Connectivity Program—Install pedestrian and bicycle connectivity improvements at every major Metro transit station by providing enhanced sidewalk amenities such as landscaping, shading, lighting, directional signage, shelters, curb extensions and midblock crosswalks where feasible, ADA ramps, lead pedestrian interval signal phases, secure bike parking, etc.*

The Project would contribute by providing enhancements such as secure bike parking, landscaping, lighting, and signage. The Project would retain existing sidewalks. In addition, as discussed earlier, the Project driveway options include a driveway on Vine Street that would be right-in/right-out, which is intended to reduce vehicle/pedestrian conflicts on this route to the Metro B Line (Red). Therefore, the Project would not conflict with Mobility Plan Program ENG.19.

> *Parking/Loading Zones Program PK.10 Pedestrian Improvement Incentives—Establish an incentive program to encourage projects to retrofit parking lots, structures and driveways to include pedestrian design features.*

> *Planning & Land Use Program PL.1 Driveway Access—Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.*

Vine Street is classified as Avenue II and is included in the Vision Zero High Injury Network. Mobility Plan programs PL.1 and PK.10 encourage vehicular access from non-arterial streets (or alleys) and incentivizes redesigning access points to be more pedestrian friendly. The Project would accommodate the Mobility Plan policies by limiting the Vine Street driveway to a right-in/right-out only driveway to reduce conflicts. Specific Vision Zero projects are not planned for Vine Street, and the Project would not preclude or conflict with future Vision Zero projects. The other proposed driveways are on De Longpre Avenue and Afton Place, which are non-arterial streets. Therefore, the Project would not conflict with these two programs.

(b) LADOT Manual of Policies and Procedures Section 321

LADOT MPP Section 321 states that on a collector or local street, such as De Longpre Avenue or Afton Place, driveways should not be placed within 75 feet of the adjacent street (for a project with frontage greater than 250 feet). Driveways on arterial highways serving lots with frontages greater than 250 feet should not be placed within 150 feet of the adjacent street. LADOT MPP Section 321 also states that driveways should not be permitted along arterial highways, such as Vine Street (Avenue II), where the proposed development is: (1) Residential, and access is possible using an alley or non-arterial street, or (2) Industrial or commercial, at the intersection of an arterial highway and a non-arterial street, and access is possible along the non-arterial frontage.

The Project includes property at the southeast corner of De Longpre Avenue & Vine Street and the northeast corner of Vine Street & Afton Place. The proposed driveway on De Longpre Avenue would be approximately 95 feet from the southeast corner of De Longpre Avenue & Vine Street. The potential driveway on Afton Place would be approximately 95 feet from the northeast corner of Vine Street & Afton Place. The potential driveway on Vine Street would be located approximately 75 feet from the northeast corner of Vine Street & Afton Place. As such, the Vine Street driveway would not conform to LADOT MPP Section 321, Subsection V.A, regarding the distance from the nearest intersection. However, the Project would accommodate Mobility Plan 2035 policies by limiting the Vine Street driveway to a right-in/right-out only driveway to reduce conflicts. As stated in Section 321, the goal of good driveway design is to minimize adverse effects on street traffic. Thus, the Project would not conflict with this overall intent of Section 321.

With respect to driveway widths, LADOT MPP Section 321 also recommends a two-way driveway width of 30 feet for multi-family residential developments with more than 25 parking spaces and commercial developments. All potential driveways on Vine Street, De Longpre Avenue, and Afton Place would have drive aisle widths of 26 feet and total apron widths of 30 feet. The Project's driveway scenarios would conform to this aspect of LADOT MPP Section 321.

With respect to loading areas, LADOT MPP Section 321 also advises that loading docks that back-in or back-out loading facilities should not be permitted along arterial highways or collector streets. The Project's loading would be accessed on De Longpre Avenue, which is a collector street, but the Project would conform with the requirement that back-in loading facilities may be permitted on commercially developed streets if off-street space is insufficient for truck maneuvering and the minimum reservoir area is 45 feet back of the sidewalk. As such, the Project would conform to this aspect of LADOT MPP Section 321.

(c) Los Angeles Municipal Code

(i) LAMC Section 12.21-A,16 (Bicycle Parking)

In accordance with LAMC requirements and the City's Bicycle Parking Ordinance, the Residential Option with bungalows as restaurants would be required to provide 269 bicycle parking spaces (53 short-term and 216 long-term), and the Residential Option with bungalows as residential units would be required to provide 261 bicycle parking spaces (49 short-term and 212 long-term). Overall, the Residential Option with either bungalows or restaurants would provide 269 bicycle parking spaces (53 short-term and 216 long-term).

The Office Option with bungalows as restaurants would be required to provide 160 bicycle parking spaces (57 short-term and 103 long-term), and the Office Option with bungalows as residential units would be required to provide 162 bicycle parking spaces (54 short-term and 108 long-term). Overall, each Office Option development scenario would comply with requirements by providing the required amount of bicycle parking spaces.

Therefore, the Project would provide on-site bicycle parking in accordance with LAMC requirements and the City's Bicycle Parking Ordinance.

(ii) LAMC Section 12.26-J (TDM Ordinance)

As LAMC Section 12.26-J applies to the construction of new non-residential gross floor area, and to developments in excess of 25,000 square feet of commercial area, the Project would comply with the City's TDM Ordinance by implementing the following: commute trip reduction marketing; bicycle parking that is consistent with the City's Bicycle Parking Ordinance; on-site loading areas for residential and commercial uses; and a north-south pedestrian paseo through the Project Site.

(d) Hollywood Community Plan

Per the TAG, a review of the Community Plan was conducted to evaluate whether the Project conflicts with or precludes the implementation of the community plan framework. As discussed below, the Project would not conflict with the objectives and policies that support the goals of the Community Plan related to transportation and circulation.

(i) Objectives

Plan Objective 6—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.

The Project Site is located in a highly urbanized area that is well-served by public transit provided by Metro and LADOT, and the Project would include various streetscape improvements such as additional street trees and landscaping, and a private walkway between the proposed mixed-use building and the relocated bungalows to encourage walkability under the Residential Option. As such, the Project would also support the improvement of the pedestrian circulation system. In addition, Project would site commercial uses on the ground level and utilize window walls along the storefronts to enhance the pedestrian environment and further encourage pedestrian activity along Vine Street, De Longpre Avenue, and Afton Place. Furthermore, as detailed above, the Project would comply with LAMC bicycle parking requirements. Thus, the Project would not conflict with Objective 6 in as much as the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling, that could help to reduce the amount of vehicle traffic in the Project vicinity.

(ii) Policies and Programs

The Community Plan also includes a circulation policy section and a circulation public improvement program. The policy section provides a discussion regarding public provision of an improved public transportation system and/or additional highways and freeways. The Plan commits to following the standards in, and incorporates by reference those standards and other guidelines in, the Mobility Plan 2035 and the transportation program described in Section 518.1 of the Hollywood Redevelopment Plan. The Community Plan identifies transportation-related policies and programs to achieve Objective 6. The following circulation-related policies and programs are relevant to the Project:

Standards and Criteria—Arterials and local streets shall be developed with standards and criteria contained in the Mobility Plan 2035.

Public Improvements (a)—Continued development of the freeway, arterial, and street system in conformance with the existing and future adopted programs. This should include participation of the City in a regional study focusing on Route 2 capacity increases.

The Project would support these policies by dedicating five feet of right-of-way along the De Longpre Avenue and Afton Place frontages as the current widths are narrower than their local street classifications defined in the Mobility Plan. Vine Street is classified as an

Avenue II that includes existing widths that are consistent with the classification defined in the Mobility Plan.

> *Public Improvements (b)—Continued planning of and improvements to the public transportation system of the community, including people-mover systems in high intensity areas as well as the proposed Metro Rail System.*
>
> *Public Improvements (c)—Preparation of a Hollywood Transportation Plan in ordinance form which creates an integrated program of transportation mitigation measures.*
>
> *Public Improvements (d)—Improvement of the Highland/Franklin intersections, including jog elimination either through realignment of Franklin Avenue or through grade separation.*
>
> *Public Improvements (e)—Improvement of Fountain Avenue as an east-west arterial, including jog elimination in the vicinity of Le Conte Junior High School.*
>
> *Public Improvements (f)—Improvement of the Hollywood Boulevard/La Brea intersection, including jog elimination.*
>
> *Public Improvements (g)—Improvement of the Los Feliz Boulevard/Western Avenue intersection, including realignment of the curve.*
>
> *Public Improvements (h)—Improvement of Martel Avenue/Vista Street as a north-south arterial, including jog elimination north of Waring Avenue.*

The Project would not conflict with or prevent the City from pursuing these recommended Public Improvements (b) through (h) listed on page H0-6 of the Community Plan. Therefore, the Project would not conflict with the Community Plan's circulation based guidance.

(f) Hollywood Redevelopment Plan

The Project would not conflict or prevent the City from pursuing the following policies from Section 518 of the Hollywood Redevelopment Plan regarding circulation, parking, and loading facilities:

> *The Redevelopment Agency and the City should prepare an ordinance establishing a transportation program for Hollywood.*
>
> *Improve traffic flow on five circulation corridors including La Brea Avenue/Highland Avenue, Franklin Avenue, Sunset Boulevard/Fountain Avenue/Santa Monica Boulevard, Cahuenga Boulevard/Gower Street, and Western Avenue.*

Traffic-related impacts of new developments expected to have circulation impacts should be analyzed in a traffic study and appropriate requirements imposed as a condition of approval based on the traffic mitigation measures identified in the traffic study.

Encourage creative solutions to parking including the shared use of parking areas, flexible parking programs, and public parking structures and standards.

In addition, the Project's parking garage would be consistent with the Redevelopment Plan's policy that parking spaces, parking facilities, and loading areas shall be designed to promote public safety and to prevent an unsightly or barren appearance.

(g) Vision Zero

As discussed above, the Project Site is adjacent to Vine Street, which is included in the Vision Zero High Injury Network. However, specific Vision Zero projects are not planned for Vine Street, and the Project would not preclude or conflict with future Vision Zero projects.

(h) Citywide Design Guidelines

The Project does not conflict with Citywide Design Guideline 2 to carefully incorporate vehicular access such that it does not degrade pedestrian access as it limits turning movements for the driveway on Vine Street for the Residential Option and Office Option under the Vine and De Longpre Driveways Scenario and places driveways on collector streets for the Office Option under the Afton & De Longpre Driveways Scenario and Afton Cul-de-sac & De Longpre Driveways Scenario.

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

As discussed in detail in Section IV.G, Land Use, and Appendix K, Land Use Tables, of this Draft EIR, the Project would not conflict with Citywide Design Guidelines policies that address the circulation system. As such, the Project would not conflict with these programs, plans, ordinances, and policies.

(j) Conclusion

As summarized above and detailed in Appendix R of this Draft EIR, with the exception of conflict with Mobility Plan Policy 4.13 and nonconformance with LADOT MPP Section 321, Subsection V.A, for the Vine Street driveway proposed along an arterial frontage, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As discussed above, although the Project's parking may exceed the LAMC's minimum requirements, the Project is consistent with the overall intent of Policy 4.13 and

the Mobility Plan. The policy is intended to implement broader regional goals, not to mitigate an environmental effect. Thus, even if the Project's amount of parking was conservatively considered to be inconsistent with Policy 4.13, such inconsistency would not be considered to be a significant impact under CEQA. Furthermore, although the proposed driveway on Vine Street is less than 150 feet from the nearest intersection, the Project would limit turning movements to right-in and right-out to minimize conflicts with vehicles traveling through on Vine Street. Thus, the Project would not conflict with the overall intent of Section 321, which states that the goal of good driveway design is to minimize adverse effects on street traffic.

Therefore, Project impacts related to applicable programs, plans, ordinances, and policies addressing the circulation system would be less than significant.

(2) Mitigation Measures

Project-level impacts related to applicable programs, plans, ordinances, and policies addressing the circulation system were determined to be less than significant, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to applicable programs, plans, ordinances, and policies addressing the circulation system 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)?

(1) Impact Analysis

As discussed above, Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

As discussed above, the Project Site is located in the Central APC area and is subject to the following LADOT thresholds for determining VMT impacts:

- Household VMT per Capita: 6.0

- Work VMT per Employee: 7.6

In addition, a regional-serving retail project would result in a significant VMT impact if it would result in a net increase in total daily VMT.

(a) Residential Option

Based on the VMT Calculator and as shown in Table IV.J-1 on page IV.J-39, the Residential Option with bungalows as either restaurants or residential units would result in a 5.6 household VMT per capita, which is below the 6.0 threshold. Therefore, the Residential Option would not have a significant impact on household VMT per capita.

As discussed above, since the retail/restaurant components of the Residential Option are greater than 50,000 square feet and could be considered regional serving, they were evaluated using the City's travel demand forecasting model. The City's model estimated a total daily VMT of 174,569,000 miles across the model network focus area when run without the retail and restaurant components of the Residential Option. With the Residential Option retail and restaurant uses included, the model estimated a total daily VMT of 174,557,000 miles. This provides a net decrease of 12,000 daily miles from the estimate without the Residential Option retail component added. This decrease in VMT suggests that the addition of the proposed retail uses in the Residential Option would shorten trips; thus, the retail impact on VMT would not be significant.

(b) Office Option

The retail and restaurant uses proposed by the Office Option total less than 50,000 square feet and therefore are considered local-serving uses. As a result, the retail and restaurant uses in the Office Options are not considered to have a significant impact and screened out from further VMT analysis.

Based on the VMT Calculator, the Office Option with bungalows as restaurants would result in a 5.2 work VMT per capita. Based on the VMT Calculator, the Office Option with bungalows as residential units would result in a 3.0 household VMT per capita and a 4.9 work VMT per capita. As these VMT per capita values would be below the respective thresholds, the Office Option with bungalows as either restaurants or residential units with would not have a significant impact on VMT.

Given that the Residential Option and three Office Options are not projected to have a significant impact on VMT, the Project would not propose a TDM plan as a mitigation measure. However, the Project's location and provision of bicycle parking on-site would encourage the use of alternative modes of transportation, and the City may require

Table IV.J-1
Project VMT per Capita and Employee

Project Option	Household			Work		
	Project VMT per Capita	LADOT Threshold	Impact?	Project VMT per Employee[a]	LADOT Threshold	Impact?
Residential Option with Bungalows as Restaurants	5.6	6.0	No	—	7.6	—
Residential Option with Bungalows as Residential Units	5.6	6.0	No	—	7.6	—
Office Option with Bungalows as Restaurants[b]	—	6.0	—	5.2	7.6	No
Office Option with Bungalows as Residential Units[c]	3.0	6.0	No	4.9	7.6	No

[a] *Based on the LADOT TAG and the City of Los Angeles VMT Calculator User Guide, a portion of, or entirety of a project that contains small-scale or local serving retail land uses is assumed to have less-than-significant VMT impacts and can be excluded from the VMT analysis if less than 50,000 square feet. Local serving retail land uses would include restaurants. Retail uses totaling more than 50,000 could be considered regional serving uses and would require evaluation with the City of Los Angeles' citywide travel demand forecasting model in addition to the VMT Calculator.*

[b] *This scenario does not include residential uses.*

[c] *Although this scenario proposes nine duplex units, the VMT calculator input assumed such units were nine single-family houses, which provides a conservative analysis.*

Source: Fehr and Peers, 2021.

implementation of additional TDM measures in accordance with the City's current TDM ordinance.

(2) Mitigation Measures

Project-level impacts with regard to VMT pursuant to CEQA Guidelines Section 15064.3 would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts with regard to VMT pursuant to CEQA Guidelines Section 15064.3 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

The Project Site's topography is generally flat, and there are no slopes, curves, landscaping or other barriers that would impede visibility. The streets adjacent to the Project site (Vine Street, De Longpre Avenue, and Afton Place) are also flat and do not curve. In addition, the Project would not result in incompatible uses as the proposed residential, office, and commercial retail/restaurant uses are consistent with the surrounding development.

Based on the TAG, because the Project would provide new driveways and vehicle access as well as modifications to the public right-of-way, further analysis was required to assess potential impacts (e.g., safety, operational, or capacity) for geometric design hazards.

The Project would reduce the number of on-site driveways from eight driveways (i.e., four on Afton Place and four on De Longpre Avenue) to two driveways. Specifically, as previously described, the Project would provide the following three driveway scenarios: 1) a right-in/right-out driveway on Vine Street and a two-way all-way access driveway on De Longpre Avenue; 2) all-access driveways on Afton Place and De Longpre Avenue; or 3) all-access driveways on Afton Place and De Longpre Avenue with an added cul-de-sac (i.e., street closure to through traffic) directly east of the driveway on Afton Place. All driveways would provide access to the subterranean parking garage, and all three options would locate the loading dock adjacent to the De Longpre Avenue driveway.

Furthermore, the potential driveways on Vine Street, De Longpre Avenue, and Afton Place would have drive aisle widths of 26 feet and total apron widths of 30 feet which would comply with LADOT standards, as discussed under Threshold (a). The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. The Project driveways would be sloped for vehicles to enter and exit the subterranean parking garage. As drivers exiting the subterranean parking garage may have limited visibility of pedestrians crossing the driveway, the Project would implement blind spot mirrors to improve driver visibility and warning sounds/lights to alert pedestrians of approaching vehicles pursuant to Project Design Feature TR-PDF-1. The Project would also locate driveways at right angles to avoid visibility challenges once vehicles have exited the subterranean parking garage. Vine Street adjacent to the Project is part of the designated High Injury Network, but the proposed Vine Street driveway would be limited to right-in/right-out access to reduce conflicts that might otherwise occur between left-turning vehicles and pedestrians, bicyclists, and vehicles traveling on Vine Street and would not preclude the City from implementing changes associated with Vision Zero. The Afton Place and De Longpre Avenue driveways are not along a High Injury Network. The Project

is not located in a Safe Routes to School program area. Thus, the Project would not substantially increase hazards due to the proposed driveways.

In addition, residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. Consistent with City Ordinance No. 185,480 requirements, short-term bike parking spaces would be provided outside the building in close proximity to the building entrances, and the long-term bicycle parking would be provided inside the subterranean parking in secured areas. The Project's access locations would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways would intersect at right angles. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets and parking garage.

Furthermore, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a development project adds 25 or more trips to any freeway off-ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queueing impacts following the identified steps in the guidelines. As identified in the Transportation Assessment, the Residential Option is not projected to add 25 or more trips to any freeway off-ramp in either peak hour. The Office Option is projected to add 25 or more trips to the US-101 Southbound Off-ramp to Vine Street (A.M. peak hour) and the US-101 Northbound Off-ramp to Sunset Boulevard (A.M. peak hour).[8]

Under the Office Option, based on additional analysis of the US-101 Southbound Off-ramp to Vine Street, the queue length on the off-ramp is not projected to exceed ramp capacity in the Future Base or Future plus Project scenarios during the A.M. peak hour. The Office Option is projected to add two cars (assuming an average queue storage length of 25 feet per car) to the queue in the A.M. peak hour, and the addition would not exceed the ramp storage capacity. Therefore, the Office Option is not projected to have a significant safety impact for the US-101 Southbound Off-ramp to Vine Street, and no further analysis would be required for this off-ramp.

Under the Office Option, based on additional analysis of the US-101 Northbound Off-ramp to Sunset Boulevard, the queue length on the off-ramp is projected to exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus

[8] *The Office Option is estimated to generate the same number of inbound trips in the A.M. peak hour whether the bungalows are developed as 8,988 square feet of quality restaurant space or nine residential units.*

Project Scenario. The Office Option is projected to add three cars to the queue in the A.M. peak hour. Since the Office Option is projected to increase the overflow onto the mainline lanes by more than two car lengths, this location required further analysis. The US-101 Northbound off-ramp to Sunset Boulevard was tested for safety issues by assessing the speed differential between the off-ramp queue and the mainline of the freeway during the A.M. peak hour. Per LADOT's interim guidance, Caltrans Performance Measurement System (PeMS) data were used to identify freeway operating speeds during the A.M. peak hour. The PeMS data showed that the average mainline speed on the US-101 northbound near the Sunset Boulevard off-ramp during the A.M. peak hour is approximately 59 mph. Assuming that the traffic queued on the ramp is traveling at zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue at the US-101 Northbound Off-ramp to Sunset Boulevard.

Based on the above, the Office Option would result in a substantial increase in hazards due to a geometric design feature or incompatible use with respect to off-ramp safety at the US-101 Northbound Off-ramp to Sunset Boulevard, and impacts with respect to Threshold (c) would be significant without mitigation. Therefore, per LADOT's interim guidance, operational changes were explored to mitigate the potential safety issue at the US-101 Northbound Off-ramp to Sunset Boulevard.

(2) Mitigation Measures

To mitigate the potential safety issue at the US-101 Northbound Off-ramp to Sunset Boulevard, the Project would implement the following mitigation measure:

Mitigation Measure TR-MM-1: Prior to the operation of the Project, a protected/ permitted left-turn phase with reoptimized signal timing shall be added for westbound Sunset Boulevard at Van Ness Avenue.

This mitigation measure would address the identified safety issue along the US-101 Northbound Off-ramp to Sunset Boulevard, by alleviating congestion on Sunset Boulevard that in turn affects the off-ramp, reducing the off-ramp queue onto the freeway mainline and fully mitigating the Office Option significant and unavoidable impact to a level of less than significant.

(3) Level of Significance After Mitigation

Project-level impacts with regard to hazardous geometric design features or incompatible use were determined to be less than significant with mitigation.

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 LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. In particular, in the vicinity of the Project Site, Hollywood Boulevard, Sunset Boulevard, and Vine Street are designated disaster/emergency routes by the City's Safety Element, and Highland and Santa Monica Boulevard are designated disaster/emergency routes by County of Los Angeles Department of Public Works.[9,10]

As discussed above, construction activities associated with the Project (i.e., movement of construction equipment, hauling of soil and materials, daily construction worker traffic, utility line connections, etc.) would potentially impact the public services provided by the LAFD and the LAPD in the vicinity of the Project Site, as a result of construction impacts to the surrounding roadways. As such, these short-term and temporary construction activities could temporarily increase response times for emergency vehicles along Sunset Boulevard, Vine Street, and other main connectors due to travel time delays caused by congestion during the Project's construction phase. However, with implementation of the Construction Traffic Management Plan in accordance with Project Design Feature TR-PDF-2, emergency access would not be impeded. The Project's Construction Traffic Management Plan would require approval from LADOT prior to the start of construction to ensure that adequate and safe access will remain available within and near the Project Site during construction activities. In addition, the Project would ensure that travel lanes would continue to be maintained in each direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way, as well as on the City-designated disaster routes along Hollywood Boulevard, Sunset Boulevard, and Vine Street. As such, construction-related impacts associated with emergency access would be less than significant. Therefore, impacts to emergency access, including emergency routes, during construction of the Project would be less than significant**.**

With regard to operation, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding

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[9] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit H, adopted November 26, 1996.*

[10] *County of Los Angeles Department of Public Works, Disaster Route Maps, Los Angeles—Central, August 8, 2013.*

site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project would not include the installation of barriers that could impede emergency vehicle access. Additionally, as set forth in Project Design Feature POL-PDF-6 of this Draft EIR, prior to the issuance of a building permit, the Applicant would consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project. Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant would also submit a diagram of the Project Site to the LAPD's Hollywood Division Commanding Officer that includes access routes and any additional information that might facilitate police response, as provided in Project Design Feature POL-PDF-7. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained during operation of the Project.

Based on the above, the Project would not result in inadequate emergency access, and impacts regarding adequate 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

Project-level impacts with regard to emergency access 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 accordance with the TAG, the cumulative analysis of consistency with transportation plans and policies must include consideration of any related projects and

transportation system improvements in the vicinity of the Project Site. These related projects include residential (including live/work) units, commercial/retail/restaurant uses, offices, hotels, and art spaces.

The majority of the programs, plans, policies, and ordinances reviewed above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21-A,16 and the TDM Ordinance from LAMC Section 12.26-J apply to projects individually. Also, in many cases, the Project would specifically support key policies (such as enhancing pedestrian infrastructure) while the nearby related projects would neither support nor interfere with such policies.

In addition, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. The nearest related project to the Project Site is Related Project No. 93, the mixed-use office, residential, and retail project ("On Vine") at 1341 Vine Street across Vine Street to the west. The On Vine project, currently under construction, encompasses the entire block bounded by Vine Street, De Longpre Avenue, Ivar Avenue, and Homewood Avenue will enhance the pedestrian environment by providing publicly-accessible, landscaped outdoor space in street-level courtyards and paseos and landscaped sidewalks along the project frontages, will provide the City-required bicycle parking, and will not conflict with adjacent street designations. The EIR for the On Vine Project determined that the project would not conflict with adopted policies, plans, or programs that support public transit, bicycle, or pedestrian performance or safety.[11] Other related projects located farther from the Project site would not share adjacent street frontages with the Project Site. Accordingly, no significant cumulative impacts are anticipated to which both the Project and other nearby related projects would contribute in regard to City transportation policies or standards adopted to protect the environment and support multimodal transportation options.

Therefore, the Project, together with the related projects in the vicinity of the Project Site, 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 LADOT TAG, a development project would have a cumulative VMT impact if it were deemed inconsistent with the SCAG RTP/SCS, the regional plan to reach state air quality and GHG reduction targets. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described

[11] *Academy Square Project Draft EIR, Case No. ENV-2014-2735-EIR, March 2016.*

above would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. **Therefore, cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

(c) Hazardous Geometric Design Features and Incompatible Uses

As previously discussed, the block containing the Project Site and the overall study area are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. According to the LADOT TAG, a cumulative impact analysis for potential geometric design or land use hazards should consider the effect of access to related projects in the same block as the Project Site. While there are no related projects in the same block as the Project Site, the nearest related project to the Project Site is Related Project No. 93, the On Vine Project located at 1341 Vine Street across Vine Street to the west. As described above, the On Vine project, currently under construction, encompasses the entire block bounded by Vine Street, De Longpre Avenue, Ivar Avenue, and Homewood Avenue and will provide publicly-accessible, landscaped outdoor space in street-level courtyards and paseos and landscaped sidewalks along the project frontages. The On Vine project will have driveways on De Longpre Avenue, Ivar Avenue, and Homewood Avenue. Given that the Project and the On Vine project do not have driveways on the same street on the same block, the On Vine project is not expected to have a cumulative impact. Other related projects located farther from the Project Site would not share adjacent street frontages with the Project Site.

As previously discussed, with respect to freeway off-ramp safety, based on additional analysis of the US-101 Northbound Off-ramp & Sunset Boulevard, the queue length on the off-ramp is projected to exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus Project Scenario for the Office Option. As such, the Office Option would result in a substantial increase in hazards due to a geometric design feature or incompatible use with respect to off-ramp safety at the US-101 Northbound Off-ramp to Sunset Boulevard. **Without mitigation, such Project impacts (under the Office Option) would be cumulatively considerable and cumulative impacts would be significant. Therefore, per LADOT's interim guidance, operational changes were explored and mitigation measure TR-MM-1 would be implemented to mitigate the potential safety issue at the US-101 Northbound Off-ramp to Sunset Boulevard for the Office Option.**

(d) Inadequate 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. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle

access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the study area and would not be concentrated to a specific location. Also, as previously discussed, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, as with the Project, the related projects would not result in inadequate emergency access. **As such, the Project would not cumulatively contribute to impacts related to emergency access and impacts would be less than significant.**

(2) Mitigation Measures

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

As discussed above per Threshold (c) under Subsection 3.d, to mitigate the potential safety issue under the Office Option at the US-101 Northbound Off-ramp to Sunset Boulevard, pursuant to Mitigation Measure TR-MM-1, the Project (under the Office Option) would add a protected/permitted left-turn phase with reoptimized signal timing for westbound Sunset Boulevard at Van Ness Avenue.

(3) Level of Significance After Mitigation

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and policies; VMT/CEQA Guidelines Section 15064.3; and emergency access were determined to be less than significant without mitigation. With respect to freeway off-ramp safety, Mitigation Measure TR-MM-1 would fully mitigate the Office Option's contribution to the identified safety issue by alleviating congestion on Sunset Boulevard that in turn would reduce the off-ramp queue onto the freeway mainline to less than what would occur under the Future without Project conditions. As a result, the Project's contribution would not be cumulatively considerable. However, because of the cumulative growth of background traffic, which consists of ambient growth and trips generated by related projects, the queue would still extend onto the freeway even after the Project impact is mitigated, and cumulative traffic impacts would remain at the US-101 Northbound Off-ramp to Sunset Boulevard.