IV. Environmental Impact Analysis
K. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is primarily based on the Transportation Assessment for the District NoHo Mixed-Use Project dated October 2021 (Transportation Study)[1] prepared for the Project, and included in its entirety in Appendix R.1 of this Draft EIR.

The Transportation Study 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 vehicle miles travelled (VMT) rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Study was approved by LADOT on February 1, 2022. A copy of LADOT's Assessment Letter for the Transportation Study is included as Appendix R.2 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

[1] *Gibson Transportation Consulting, Inc., Transportation Assessment for the District NoHo Mixed-Use Project, October 2021.*

- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035
- North Hollywood–Valley Village Community Plan
- Los Angeles Municipal Code
- Transit-Oriented Communities Guidelines
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- Vision Zero
- Interim Guidance on Freeway Safety
- Citywide Design Guidelines

(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, 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 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 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: CARB'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, Senate Bill (SB) 375 requires that regional housing elements and transportation plans be synchronized on eight-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. Section 21466.5 also includes light emissions thresholds related to driver impairment.

(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 had been released August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, 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 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; adopted 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 CEQA include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop[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

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[2] *"Major transit stop" is defined in PRC Section 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.*

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 Transportation Assessment Guidelines.

(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 Connect SoCal 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 greenhouse gas 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 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, a 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,

[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.*

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:
  - 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; Transit Enhanced Network; Vehicle Enhanced Network; and Neighborhood Enhanced Network. In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts.

(b) North Hollywood–Valley Village 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 Element 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 North Hollywood–Valley Village community plan area. The North Hollywood–Valley Village Community Plan was adopted in 1996 and amended in 2016 as part of the Mobility Plan 2035 Update. While an updated Community Plan is currently under development, the current plan remains in effect. While the Community Plan does not include transportation-related objectives, policies, and programs, it identifies the need to maximize the development opportunities of the rail transit system (i.e., the Metro B (Red) Line), and identifies opportunities for joint development projects and development near the Metro North Hollywood Station.

(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. It should be noted that a draft of the City's updated TDM ordinance was released in June 2021.[5] It requires more comprehensive TDM programs, applies to a broader range of development projects, and incorporates TDM monitoring and reporting requirements. As of March 2022, the updated TDM ordinance has not been adopted.

LAMC Section 14.4.5 A states that no sign or sign support structure shall be erected, constructed, painted or maintained, and no permit shall be issued, if the sign or sign support structure, because of its location, size, nature or type, constitutes a hazard to the safe and efficient operation of vehicles upon a street or a freeway, or which creates a condition that endangers the safety of persons or property.

(d) Transit-Oriented Communities Guidelines

Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22 A.31 was added to create the Transit-Oriented Communities (TOC) Affordable Housing Incentive Program to encourage affordable housing near transit. The TOC Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program. TOC incentive areas are tiered based on a project site's distance from transit and the type of transit. The Project Site is located in a Tier 4 TOC area because of its proximity to the Metro North Hollywood Station.

(e) 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 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

[5] *City of Los Angeles, Transportation Demand Management (TDM) Program Update Draft Ordinance for Public Comment – June 2021, https://planning.lacity.org/odocument/1dc924ce-b94a-403b-afe0-17ba33b3dbe1/Draft_TDM_Ordinance.pdf, accessed December 6, 2021.*

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.[6]

(f) 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.

(g) Interim Guidance on 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 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.

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

- Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes based on the 95th percentile queue length using Synchro or a comparable Highway Capacity Manual analysis methodology.
- The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
- 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).

[6] *LADOT, Transportation Assessment Guidelines, July 2020.*

Should a significant impact be identified, mitigation measures to be considered include TDM measures 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/phasing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to improve safety, not induce greater VMT, and not result in secondary environmental impacts.

(h) 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 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.

(i) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan 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 Elementand Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design which serves to reduce VMT.

b. Existing Street Systems

The existing street system in the study area consists of freeways, arterials, collector, and local streets, which provide regional, sub-regional, and local access and circulation within the study area. The existing street system and transit network is shown in Figure IV.K-1 on page IV.K-13.

(1) Freeways

Regional access to the Project Site is provided by State Route (SR) 170 located approximately 0.3 mile west of the Project Site; US-101 located approximately 0.9 mile southwest of the Project Site; and SR-134 located approximately 0.9 mile south of the Project Site. Each of these freeways are described below:

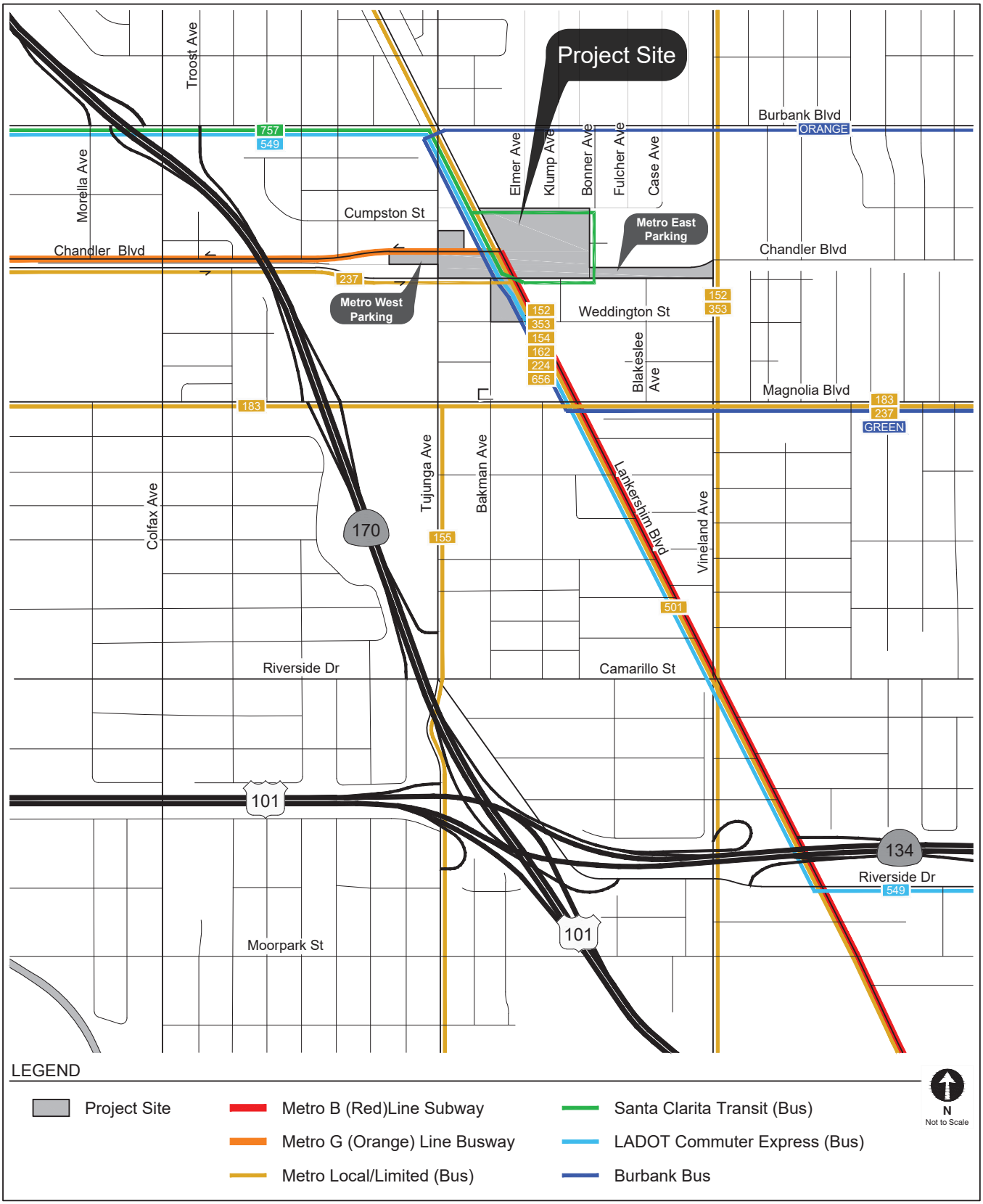

Figure IV.K-1
Existing Street System and Transit Network

Source: Gibson Transportation Consulting, Inc., 2020.

- SR-170 runs in the northwest-southeast direction and is located 0.3 mile west of the Project Site. SR-170 provides four travel lanes in each direction along with various auxiliary lanes. Access to and from SR-170 is available via interchanges at Burbank Boulevard, Magnolia Boulevard, and Riverside Drive/Tujunga Boulevard.

- US-101 generally runs in the east-west direction west of SR-170 and in the northwest-southeast direction south of SR-170 and SR-134. It is located 0.9 mile southwest of the Project Site. US-101 provides five travel lanes in each direction along with various auxiliary lanes. Access to and from US-101 is available via interchanges at Tujunga Avenue, Riverside Drive, Vineland Avenue, and Lankershim Boulevard.

- SR-134 runs in the east-west direction and is located approximately 0.9 mile south of the Project Site. SR-134 provides four travel lanes in each direction along with various auxiliary lanes. Access to and from SR-134 is available via interchanges at Vineland Avenue, Lankershim Boulevard, and Cahuenga Boulevard.

(2) Streets

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

- Burbank Boulevard is a designated Boulevard II located 0.25 mile north of Chandler Boulevard (approximately 800 feet north of the northern edge of the East Site) and travels in the east-west direction. It provides two travel lanes east of Lankershim Boulevard and four travel lanes west of Lankershim Boulevard with a center left-turn lane throughout. Unmetered parking is generally available on both sides of the street near the Project Site. Inside lanes are generally 10 feet wide and the total paved width varies from 54 to 80 feet. There are bicycle lanes in each direction west of Elmer Avenue. Burbank Boulevard is part of the Bicycle Enhanced Network, Neighborhood Enhanced Network, and the Pedestrian Enhanced District. Additionally, it is designated as part of the High Injury Network near the Project Site.

- Cumpston Street is a local street west of Tujunga Avenue and a collector street east of Tujunga Avenue. The street travels in the east-west direction and is located along the north side of the East Site. It provides two travel lanes and, east of Lankershim Boulevard, a center left-turn lane. Unmetered parking is generally available on both sides of the street west of Lankershim Boulevard and east of Fair Avenue. Additional unmetered parking is available on the north side of the street between Klump Avenue and Fair Avenue. Metered parking is generally available on both sides of the street between Lankershim Avenue and

Klump Avenue. Additional metered on-street parking is provided on the south side of the street between Klump Avenue and Fair Avenue. The total paved width is 54 feet adjacent to the Project Site. Cumpston Street is part of the Neighborhood Enhanced Network.

- Chandler Boulevard is a designated Boulevard II and travels in the east-west direction. West of Lankershim Boulevard, Chandler Boulevard is divided into north and south sections separated by the Metro G (Orange) Line busway and Block 0 West of the Project Site. The north section provides two westbound travel lanes and the south section provides two eastbound travel lanes (and one westbound travel lane adjacent to Block 0). East of Lankershim Boulevard, Chandler Boulevard provides four travel lanes and a center left-turn lane along the south side of the East Site. Bicycle lanes are provided in both directions throughout Chandler Boulevard along the Project frontage, including westbound on the north section of Chandler Boulevard and eastbound on the south section of Chandler Boulevard. On-street parking is generally available on both sides of the street near the Project Site, including metered parking east of Tujunga Avenue. Inside lanes are generally 10 feet wide and the total paved width varies from 38 feet west of Tujunga Avenue to 80 feet east of Lankershim Boulevard. Chandler Boulevard is part of the Bicycle Path Network, Bicycle Network, and the Pedestrian Enhanced District.

- Weddington Street is a local street and travels in the east-west direction. It is located adjacent to the southern border of Block 8 and provides one lane in each direction with no striping. Metered parking is available on both sides of the street near the Project Site. The total paved width of the street is generally 35 feet.

- Magnolia Boulevard is a designated Avenue II and travels in the east-west direction. It is located 0.25 mile south of Chandler Boulevard (approximately 750 feet south of the southern edge of Block 8). It provides three to four travel lanes (west of Lankershim Boulevard it only provides one eastbound lane) and a center left-turn lane. Parking is generally available on both sides of the street near the Project Site, including metered parking between Lankershim Boulevard and Vineland Avenue. Inside lanes are typically 10 feet wide and the total paved width is generally 68 feet. Magnolia Boulevard is part of the Pedestrian Enhanced District. Additionally, it is designated as part of the High Injury Network near the Project Site.

- Camarillo Street is a designated Avenue II and travels in the east-west direction. It is located approximately 0.6 mile south of the Project Site and provides two to travel lanes with a center left-turn lane. Unmetered parking is generally available on both sides of the street near the Project Site. Inside lanes are generally 10 feet wide and the total paved width is generally 56 feet. Camarillo Street is part of the Bicycle Network.

- Riverside Drive is a designated Avenue I and travels in the east-west direction. It is located approximately 1.1 miles south of the Project Site and provides four travel

lanes with a center left-turn lane. Unmetered parking is generally available on both sides of the street near the Project Site. Inside lanes are generally 10 feet wide and the total paved width is 78 feet. Bicycle lanes are provided in both directions west of SR-170. Riverside Drive is part of the Bicycle Network and the Pedestrian Enhanced District.

- Moorpark Street is a designated Avenue II and travels in the east-west direction. It is located approximately 1.3 miles south of the Project Site and provides two travel lanes with a center left-turn lane. Unmetered parking is generally available on both sides of the street near the Project Site. The total paved width is generally 56 feet.

- Colfax Avenue is a designated Avenue II and travels in the north-south direction. It is located approximately 0.6 mile west of the Project Site and provides two travel lanes with a center left-turn lane. Unmetered parking is generally available on both sides of the street near the Project Site. The total paved width is generally 62 feet. Bicycle lanes are provided in both directions. Colfax Avenue is part of the Bicycle Network and Pedestrian Enhanced District. It is identified as part of the High Injury Network between Burbank Boulevard and Chandler Boulevard.

- Tujunga Avenue is a designated Avenue II and travels in the north-south direction. It is located adjacent to the western border of Block 0. North of Magnolia Boulevard, it provides two northbound travel lanes, one southbound travel lane, and a center left-turn lane. South of Magnolia Boulevard, it provides two travel lanes with a center left-turn lane. South of Riverside Drive / Camarillo Street, it provides one northbound travel lane, two southbound travel lanes, and a center left-turn lane. Unmetered parking is generally available on both sides of the street north of Chandler and metered parking is generally available on both sides of the street south of Chandler. The total paved with is generally 56 feet. Tujunga Avenue is part of the Neighborhood Enhanced Network and Pedestrian Enhanced District.

- Bakman Avenue is a local street and travels in the north-south direction. It is located adjacent to the western border of Block 8 and provides one lane in each direction with a dashed yellow centerline. Metered parking is generally available on both sides of the street between Chandler Boulevard and Weddington Street and unmetered parking is available on both sides of the street south of Weddington Street. The total paved width is generally 50 feet. Bakman Avenue is part of the Neighborhood Enhanced Network.

- Lankershim Boulevard is a designated Boulevard II and travels in the north-south direction. It passes through the middle of the Project Site and provides four lanes with a center left-turn lane. Metered parking is generally available on both sides of the street near the Project Site. Inside lanes are generally 10 feet wide and the total paved width is generally 72 feet. Lankershim Boulevard is part of the Transit Enhanced Network, Bicycle Network, and Pedestrian Enhanced District.

Additionally, it is designated as part of the High Injury Network north of Camarillo Street.

- Elmer Avenue is a local street and travels in the north-south direction. It is located adjacent to the Project Site and provides one lane in each direction with no striping. Unmetered parking is generally available on the west side of the street near the Project Site. The total paved width is generally 30 feet.

- Klump Avenue is a collector street and travels in the north-south direction. It begins immediately north of Cumpston Street adjacent to the East Site and provides one lane in each direction with no striping. Unmetered parking is available on both sides of the street near the Project Site. The total paved width is generally 30 feet.

- Fair Avenue is a local street and travels in the north-south direction. It is located along the eastern border of the East Site and provides two lanes with a center left-turn lane. Unmetered parking is generally available on the east side of the street. The total paved width is 44 feet. Fair Avenue is part of the Neighborhood Enhanced Network.

- Vineland Avenue is a designated Boulevard II and travels in the north-south direction. It is located along the eastern border of the East Lot. North of Chandler Boulevard, it provides four lanes with a center left-turn median. South of Chandler Boulevard, it provides four lanes with a planted median. Unmetered parking is generally available on both sides of the street near the Project Site. Inside lanes are generally 10 feet wide and the total paved width is generally 80 feet. Vineland Avenue is part of the Bicycle Network, Neighborhood Enhanced Network, and Pedestrian Enhanced District. Additionally, it is identified as part of the High Injury Network north of Camarillo Street.

(3) Regional Transportation System

(a) Freeways

As discussed above, primary regional access to the Project area is provided by SR-170, US-101, and SR-134, which are accessible within 1 mile of the Project Site.

(b) Transit System

The Project Site is served by Metro bus lines 152/353, 154, 155, 162, 183, 224, 237/656, 501, and G (Orange); LADOT Commuter Express Line 549; Burbank Bus Green and Orange Lines; and Santa Clarita Transit Line 757. In addition to the bus lines that provide service within the Project vicinity, Metro operates the Metro B (Red) Line subway in the Study Area. The Metro B (Red) Line runs between North Hollywood and downtown Los Angeles where it connects with the Metro A (Blue) Line, Metro D (Purple) Line, Metro E (Expo) Line, and Metro L (Gold) Line. Table 7 of the Transportation Study lists hours of

operation and average headways for the transit lines serving the Project Site and existing transit services near the Project Site are shown in Figure IV.K-1 on page IV.K-13.

c. Existing Project Site Conditions

The Project Site and Off-Site Metro Parking Areas are currently developed with industrial/warehouse uses, surface parking, and the Metro North Hollywood Station and G (Orange) Line terminus. Vehicular access at the Project Site is currently provided at various driveways on adjacent streets.

d. Existing Pedestrian and Bicycle Facilities

(1) Pedestrian Facilities

Table 5 in the Transportation Study summarizes the width, amenities, and condition of all sidewalks within 0.25 mile of the Project Site. As shown therein, most of the sidewalks in the vicinity of the Project Site do not currently meet Mobility Plan standard widths. There are also many locations where sidewalks are missing or uneven, especially on local residential streets.

(2) Bicycle Facilities

There are existing bicycle lanes on Burbank Boulevard, Vineland Avenue, and Chandler Boulevard, including Chandler Boulevard (North), Chandler Boulevard (South), and Chandler Boulevard east of Lankershim Boulevard. East of Fair Avenue, there is a Class IV bicycle path passing through the southern edge of the East Lot and continuing east past Vineland Avenue as the Chandler Bikeway to Burbank.

e. Future Transportation Context

(1) Related Projects

The Transportation Study also considers the effects of other development proposals (related projects) either proposed, approved, or under construction near the Project Site. The list of related projects was compiled based on information obtained from the Department of City Planning (DCP) and LADOT, as well as recent studies of projects in the area. A total of 34 related development projects were identified in the vicinity of the Project Site, as shown in Figure III-1 and listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. Although the buildout years of many of these related projects are uncertain, and notwithstanding that some may not be approved or developed, all related projects were considered.

(2) Future Infrastructure Improvements

(a) North Hollywood Station Transit Neighborhood Plan

The North Hollywood Station Transit Neighborhood Plan (TNP) is one of five transit neighborhood plans in preparation by DCP along the Metro G (Orange) Line busway. The plan aims to "encourage transit ridership, promote job creation, preserve or enhance current industrial uses, improve the urban built environment, and focus new growth and housing in proximity to transit and along key corridors." The Orange Line TNP would achieve this focus by encouraging further development of homes, offices, and retail around the Metro North Hollywood Station. As of March 2022, the draft TNP has not yet been released for public review. However, the TNP is not expected to propose any modifications to the existing street network and therefore was not accounted for in this analysis.

(b) Metro G (Orange) Line Improvements Project

The Metro G (Orange) Line Improvements Project would upgrade the existing Metro G (Orange) Line to provide faster travel speeds and improved reliability through grade separated crossings and gates at grade-level crossings. Near the Project Site, this project would install gates and concrete median islands across Tujunga Avenue where the busway crosses. The gates could allow buses to receive signal preemption and would improve safety for all road users. With the gates and median islands in place, in consideration of the limited distance on Tujunga Avenue between Chandler Boulevard (North) and Chandler Boulevard (South), left turns would be eliminated from Tujunga Avenue to Chandler Boulevard (North). The Metro G (Orange) Line Improvements Project is anticipated to be complete and in operation by year 2025. The elimination of left turns was accounted for in this analysis.

(c) Metro North Hollywood to Pasadena BRT

The Metro North Hollywood to Pasadena BRT project is a transit corridor development project which would connect North Hollywood, Burbank, Glendale, Eagle Rock, and Pasadena via dedicated bus rapid transit lanes. This transit improvement would improve access to both local and regional destinations by providing connections to major job centers and connections to the Metro B (Red) Line, Metro G (Orange) Line, and Metro L (Gold) Line light rail. The Project's Consolidated Transit Center would be the western terminus of the Metro North Hollywood to Pasadena BRT. While the route and alignment of the BRT project have not been finalized, it may travel on dedicated bus lanes on Chandler Boulevard adjacent to the East Site. The Metro North Hollywood to Pasadena BRT project is anticipated to be complete and in operation by year 2024. Because the route and alignment of the BRT project have not been finalized, it is not accounted for in this analysis.

(d) Metro North San Fernando Valley BRT

The Metro North San Fernando Valley BRT project is a transit corridor development which would connect North Hollywood, Sun Valley, Panorama City, Northridge, and Chatsworth via dedicated bus rapid transit lanes. This transit improvement would improve access to both local and regional destinations by providing connections to major job centers and connections to the Metro B (Red) Line, Metro G (Orange) Line, and a potential future light rail project on Van Nuys Boulevard. The buses would stop at the Project's Consolidated Transit Center. While the route and alignment of the Metro North San Fernando BRT have not yet been finalized, it may travel in a dedicated busway on Lankershim Boulevard north of Chandler Boulevard. The Metro North San Fernando Valley BRT project is anticipated to be complete and in operation by year 2025. Because the route and alignment of the BRT project have not been finalized, it is not accounted for in this analysis.

(e) Metro NextGen Bus Plan

The Metro NextGen Bus Plan seeks to reimagine the Metro bus system to better meet the needs of current and future riders. It proposes a new bus network that is more convenient and thus more attractive to riders. In addition to reconsidering routes and frequency, it identifies smart street improvements such as signal synchronization, transit priority, stop realignments, and dedicated bus lanes. Based on the plan approved by Metro in October 2020, the Metro bus lines near the Project Site would be improved with simpler routes and higher frequency.

(f) City Bicycle Plan

The 2010 Bicycle Plan identifies the City's vision for a more integrated bicycle network throughout the City, including North Hollywood. It proposes bicycle lanes on Lankershim Boulevard, Chandler Boulevard, Camarillo Street, Riverside Drive, Vineland Avenue, and Colfax Avenue; bicycle routes on Tujunga Avenue, Burbank Boulevard, and Camarillo Street; and "bicycle friendly streets" (which would include traffic calming enhancements and other bicycle-friendly features) on various neighborhood streets near the Project Site, including Fair Avenue, Tujunga Avenue, Colfax Avenue, Cumpston Street, Otsego Street, and Bakman Avenue.

Prior to the 2010 Bicycle Plan approval, bicycle lanes had already been constructed on Chandler Boulevard, Colfax Avenue, and a portion of Vineland Avenue. These have not changed since implementation of the 2010 Bicycle Plan. Since the 2010 Bicycle Plan was approved, bicycle lanes have been installed on Riverside Drive and Vineland Avenue, bicycle routes have been installed on Burbank Boulevard, and continental crosswalks have been installed on Bakman Avenue at Weddington Street and McCormick Street. No further improvements have been made since implementation of the Plan. Lankershim Boulevard,

Camarillo Street, Riverside Drive, Tujunga Avenue, Fair Avenue, Cumpston Street, and Otsego Street have not been upgraded to include the improvements identified in the 2010 Bicycle Plan.

(g) Chandler Bikeway Project

The Chandler Bikeway Project is a City project to complete the off-street Chandler Bikeway that extends from Burbank to Chatsworth. The Chandler Bikeway Project would close a gap between Vineland Avenue and Leghorn Avenue (approximately 2.6 miles in length), identified as including the Metro North Hollywood station frontage. The Project's proposed bicycle infrastructure, was designed in coordination with LADOT and Metro to accommodate the needs of a portion of the Chandler Bikeway Project by minimizing the required routing of the westbound bike facility away from the conflicts presented by Metro's Consolidated Transit Center. The estimated year of completion is 2023.

(h) Vision Zero/Vision Zero Corridor Plans

The primary goal of Vision Zero is to eliminate traffic deaths in the City by 2025. Near the Project Site, the City has listed Lankershim Boulevard as a priority corridor on a list of active Vision Zero projects. The City has already implemented many continental crosswalks between Chandler Boulevard and Victory Boulevard as part of this program. The remaining features to be installed include signal upgrades at the intersection of Lankershim Boulevard and Burbank Boulevard and the installation of a protected left-turn signal on the northbound left-turn movement at Lankershim Boulevard and Chandler Boulevard (North). These signal improvements were incorporated into this analysis. No other Vision Zero improvements are currently proposed near the Project Site, other than Project features that would improve pedestrian and bicycle safety, such as the proposed crosswalk and bicycle crossing of Lankershim Boulevard at Chandler Boulevard (North).

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access

As previously discussed, SB 743 (PRC Section 21099(b)(1)) directed OPR to prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within TPAs. The revised guidelines are required to prohibit the consideration of automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, new CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact." As noted above, on July 30, 2019, the City adopted VMT as a criterion in determining transportation impacts under CEQA and LADOT issued guidance on August 9, 2019. The analysis in this section and the Transportation Assessment, included as Appendix R.1 of this Draft EIR, uses the latest version of the TAG updated by LADOT in July 2020.

For this analysis the Appendix G Thresholds provided above are relied upon. The methodology and base assumptions used in this analysis were established by LADOT.

b. Methodology

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

As discussed above, with implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As described above, CEQA Guidelines Threshold (a) has been updated to require an analysis of the proposed Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle and pedestrian facilities. Pursuant to guidance issued by LADOT in the TAG, plans policies, and ordinances are to be analyzed based on the screening criteria provided in the TAG. Therefore, the impact analysis below evaluates the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework discussion of this section and as identified in the TAG. In accordance with the TAG, a project that generally conforms with, and does not obstruct, the City's development policies and standards will generally be considered to be consistent.

(2) Vehicle Miles Traveled

(a) VMT Impact Thresholds

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds.[7] The TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the state's goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted the TAG in July 2019 and adopted an update in July 2020.

The TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts. Consistent with State CEQA guidance, TAG Threshold T-2.1 states that a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15 below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15 percent below the existing average work VMT per employee for the APC area in which it is located.

A regional-serving retail project, which the Project is not, would result in a significant VMT impact if it would result in a net increase in total daily VMT. The Project includes approximately 105,125 square feet of retail and restaurant, which exceeds the 50,000-square-foot threshold identified in the TAG between local-serving and regional-serving retail. Nevertheless, as discussed in detail in Chapter 5 of the Transportation Study, the

[7] *OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.*

Project does not fit the TAG's definition of a regional-serving retail project[8] and, therefore, need not conduct additional VMT analysis of retail and restaurant uses beyond employee VMT calculated by the VMT Calculator[9].

Residents contribute to household VMT while employees (including office, retail, and restaurant employees) contribute to work VMT. The TAG identifies a daily household VMT per capita impact criteria of 9.4 and a daily work VMT per employee impact criteria of 11.6 for the South Valley APC, in which the Project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 9.4, the Project's VMT impact would be less than significant for household VMT. Additionally, should the Project's average work VMT per employee be equal to or lower than 11.6, the Project's VMT impact would be less than significant for work VMT.

At the request of LADOT, Project VMT was analyzed for both an interim year known as Phase 1 and full buildout of the Project. For purposes of the VMT analysis, Phase 1 includes the construction of Block 0 (Consolidated Transit Center), Block 5/6, Block 7, Block 8, and both the East and West Off-Site Metro Parking Areas. In addition to VMT analysis of the Project as a whole, the TAG requires that the various Project land uses individually be assessed for potential VMT impacts, while still accounting for reduction in trip-making inherent to a mixed-use project. This analysis is also provided below.

Additionally, as required by the TAG for mixed-use developments, analysis was conducted of the Project's residential and office land uses individually using the VMT Calculator. In order to assess the VMT per capita associated with individual land uses while still accounting for the reduction in trips associated with interactions between the Project's mix of land uses, the VMT Calculator was run with the full mix of Project land uses, without and with each individual land use in succession. In this manner, the specific

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[8] *While the Project includes more than 50,000 square feet of retail uses, this space is split over seven blocks, with each block holding far less than 50,000 square feet of retail uses. The retail uses together comprise approximately 4.8% of the total Project floor area and are ancillary to the primary Project uses. The retail uses would be most commonly frequented by people already at the Project Site (i.e., residents, office employees, and transit riders) and the surrounding local community, and would not draw substantial numbers of customers from beyond the Study Area. Refer to Chapter 5 of the Transportation Study for additional details.*

[9] *The VMT Calculator accounts for retail and restaurant space in two ways. First, it accounts for retail/restaurant employees and employee VMT. Second, it accounts for internal trips between land uses, such as office employees patronizing an on-site restaurant for lunch rather than driving to a more distant location. In this way, the presence of the retail/restaurant space affects the VMT generated by complementary land uses. The VMT Calculator does not calculate retail/restaurant customer VMT. New local-serving retail/restaurant development like that at the Project Site tends to attract local customers away from existing, more distant retail/restaurant locations, and therefore is assumed to result in a net reduction in VMT. By excluding any VMT reduction resulting from local-serving retail/restaurant, the VMT Calculator maintains a conservative analysis of overall Project VMT.*

VMT and population effects of each individual land use could be measured within the context of a mixed-use project. Separately, because the VMT Calculator is not designed to analyze net change in VMT resulting from retail and restaurant uses, the retail and restaurant land uses were reviewed qualitatively for potential VMT impacts according to the criterion for a regional-serving retail project.[10]

A development project would have a cumulative VMT impact if it were deemed inconsistent with SCAG's RTP/SCS, the regional plan to reach State air quality and greenhouse gas reduction targets. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact.

(b) VMT Analysis Methodology

LADOT prepared a tool (VMT Calculator) designed to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The VMT Calculator (Version 1.3, released July 2020) accounts for a variety of sociodemographic, land use, and built environment factors estimated for each census tract within the City, as well as the interaction of land uses within a mixed-use development. Some of the key factors built into the VMT Calculator include travel behavior zones, mixed-use development methodology, population and employment assumptions, and transportation demand management (TDM) measures.

(i) Travel Behavior Zone

The City has developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, TBZs were designated in each Census tract throughout the City considering population density, land use density, intersection density, and proximity to transit. They 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.

[10] *As previously discussed, the Project is not a regional-serving retail project; however, the significance criterion for a regional-serving retail project (i.e., a significant impact would occur if the retail and restaurant space would result in a net increase in total daily VMT) is the most closely applicable criterion for individually assessing potential VMT impacts of the retail and restaurant land uses alone.*

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 a project address. The Project is located in a Compact Infill TBZ.

(ii) Mixed-Use Development Methodology

As detailed in the VMT Calculator Documentation, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following sociodemographic, land use, and built environment factors for a 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; and
- Household size, which affects both the number of trips made by a given residential unit (increasing or decreasing overall VMT) but also affects the number of people when calculating the daily VMT per capita.

(iii) Trip Lengths

The VMT Calculator estimates trip lengths to and from a project site based on information from the City's Travel Demand Forecasting Model (City Model). The City Model divides the City into traffic analysis zones (TAZs) to which specific land use and trip-making characteristics can be assigned. The model considers the TAZ where a project

is located to determine the trip length and trip type, both of which factor into the calculation of a project's VMT.

(iv) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the United States Department of Energy, and other modeling resources.[11] A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.

(v) Transportation Demand Management Measures

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

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

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in Quantifying Greenhouse Gas Mitigation Measures.[12]

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

[12] *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010.*

(3) Hazardous Design Features

TAG Threshold T-3 requires that the determination of significance should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design) while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions like curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program. Significance may be determined qualitatively or quantitatively as best suits the circumstances of the project.

If a significant impact is identified, mitigation measures may include installation of new traffic control devices, redesign or relocation of access points, turn restrictions, pavement markings, or vehicular demand management.

(4) 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 issues.

(5) 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. A determination was made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would implement the following Project design feature, which is relevant to the assessment of construction traffic impacts and impacts related to bicycle, pedestrian, and vehicular safety:

TR-PDF-1: Prior to the start of demolition, a Construction Traffic Management Plan shall be prepared and submitted 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:

- As parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking will be prohibited on streets in the vicinity of the Project Site;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences; and
- Ensure all soil loads are properly covered and secured.

TR-PDF-2: The Project will prepare and implement a Transportation Demand Management (TDM) Program consistent with City policies on sustainability and smart growth and with LADOT's trip reduction and multi-modal transportation program. The TDM Program shall include the following measures:

- Reduced Parking Supply—The Project would provide up to 3,313 parking spaces for Project uses along with up to 1,189 parking spaces for Metro users at full buildout. The basic parking requirements set forth by the LAMC would require a total of 4,291 parking spaces at full buildout (not including spaces for Metro users). A reduced parking supply makes parking less available and

more expensive and, therefore, encourages the use of non-automobile modes to and from the Project Site and reduces VMT.

- Promotions and Marketing—A transportation management coordinator (TMC) would be designated to reach out to Project residents and companies leasing Project office space to promote the benefits of TDM. The TMC will provide information on public transit and any available incentives, the benefits of flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided at the Project Site, and parking incentives.
- Pedestrian Network Improvements—The Project would prioritize the pedestrian experience. The Project would create a network of sidewalks with a minimum width of 12 feet around the various Blocks along with creating various publicly accessible open spaces throughout the Project Site. It also provides activated ground-floor street frontages, street trees, pedestrian-scaled streetlights, and understory plantings to create a consistent, high-quality pedestrian experience. The enhanced pedestrian connectivity would encourage pedestrian trips to and from the Project Site as well as improving accessibility to the transit options at the Project Site and, therefore, reduces automobile trips and reduces VMT. The Project also proposes upgrades to crosswalks as discussed below under Traffic Calming Improvements.
- Traffic Calming Improvements—The Project would enhance crossings of Lankershim Boulevard with refreshed and/or new continental crosswalks at both intersections with Chandler Boulevard (North and South) and would install a new continental crosswalk across Tujunga Avenue at Chandler Boulevard (North) and across District Way at Fair Avenue. These improvements would help to slow vehicular traffic and improve safety and connectivity for pedestrians.
- On-Street Bicycle Facilities—The Project is designed to accommodate the Chandler Bikeway Project through the East Site. Specifically, the Project will implement the shared street where all travel modes (i.e., pedestrians, bicycles, and vehicle) share the same roadway on District Way, the connection through the East Site to Lankershim Boulevard, the bicycle crossing signal across Lankershim Boulevard at Chandler Boulevard (North), and the Class IV bicycle lanes separated from vehicular traffic by bollards on Fair Avenue between District Way and Chandler Boulevard and on Chandler Boulevard (North) between Lankershim Boulevard and Tujunga Avenue.

The following TDM element that reduces VMT is also provided as part of the Project as regulatory compliance:

- Bicycle Parking per LAMC—The Project would provide up to 1,158 bicycle parking spaces for Project uses in compliance with the requirements of the LAMC. Additionally, beyond the LAMC requirements, the Project would provide up to 166 secure bicycle parking spaces for transit riders at one or more Metro Bike Hubs and short-term bicycle rentals through Metro's Bikeshare program or similar first mile/last mile transportation alternatives. The Project-serving bicycle facilities give residents and employees the option to use bicycles as part of their mode choice and, therefore, encourages the use of non-automobile modes to and from the Project Site and reduces VMT. The Metro Bike Hub spaces and Metro Bikeshare program or similar first mile/last mile transportation alternatives provide additional transportation options for nearby residents and employees traveling to and from the Consolidated Transit Center.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Table 2.1-2 in the TAG identifies a series of City adopted programs, plans, ordinances, and policies that establish the transportation planning regulatory framework for development in the City. Attachment D to the TAG also provides a series of questions to help guide the review of the documents in Table 2.1-1. Those questions and their responses are provided in Appendix B of the Transportation Study included as Appendix R.1 of this Draft EIR.

Each of the documents listed in TAG Table 2.1-1 was reviewed for applicability to the Project, and the relevant transportation-related policies are described below, along with the Project's conformance. In addition to the documents listed in the TAG, the Project's consistency with LAMC Section 12.21 A.4 (off-street parking requirements) was also reviewed at the request of LADOT. Although not listed in TAG Table 2.1-1, this discussion also includes a freeway safety analysis based on the City Freeway Guidance issued by LADOT in May 2020 and a discussion of applicable regulations related to illuminated signs because the Project includes digital signage that would be visible from adjacent streets.

(a) Mobility Plan 2035

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

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

It further enumerates a variety of policies and programs in support of those goals. The policies and programs that are applicable to the Project are provided in the Transportation Study included as Appendix R.1 of this Draft EIR, along with a detailed discussion of the Project's consistency with each. In summary, the Project is conceived as a pedestrian- and transit-oriented development that emphasizes accessibility by all travel modes. It is organized around a network of small blocks connecting publicly accessible open spaces with activated ground-floor street frontages to create a high-quality pedestrian experience. It would provide new or maintained (i.e., restriped) pedestrian crosswalks at a variety of locations, and all sidewalks would meet or exceed Mobility Plan standard widths.

In addition to constructing the Consolidated Transit Center, the Project would support multi-modal transportation options through the provision of secure parking for up to 166 bicycles at one or more Metro Bike Hubs, as well as designated locations for Metro's Bikeshare short-term rental program or similar first mile/last mile transportation alternatives. It would also provide convenient and secure long-term and short-term parking for bicycles at each Block. It would modify westbound bicycle infrastructure on Chandler Boulevard, including the development of a new two-way bicycle route through the Project Site. The Project would provide dedicated curb-side passenger loading areas on District Way, Chandler Boulevard, and Lankershim Boulevard. These features support the Mobility Plan networks on streets adjacent to the Project Site, including the TEN, Bicycle Network, and Pedestrian Enhanced District on Lankershim Boulevard, the Bicycle Network and Pedestrian Enhanced District on Chandler Boulevard, and the Neighborhood Enhanced Network and Pedestrian Enhanced District on Tujunga Avenue.

The Project's mix of high-density residential uses, office space, and commercial uses located adjacent to one of the largest public transit hubs in the San Fernando Valley would encourage ridesharing and the use of alternative mobility modes. Additionally, the Project's TDM elements outlined above will further reduce trips and VMT. The Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as discussed further below. The Project has a direct connection to Union Station, the largest transit hub in Southern California, via the Metro B (Red) Line. The Project would provide sufficient off-street parking to accommodate the Project's parking demand, as well as providing additional parking for Metro users.

Additionally, LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right-of-way (ROW) standards consistent with street designations identified in the Mobility Plan or request a waiver of dedication. The Project would dedicate and improve various streets and sidewalks, request to vacate ROW in some instances where the existing ROW exceeds standards, and request waivers of dedication for certain frontages, which would be accomplished through the District NoHo Specific Plan and the Project's Vesting Tentative Tract Map. The Project proposes to dedicate and improve the following streets to meet their standard ROW or sidewalk width:

- 10 feet on the north side of Chandler Boulevard adjacent to the East Site for a loading area;
- 10 feet on the south side of Chandler Boulevard (South) adjacent to Block 8;
- 8 feet on the east side of Tujunga Avenue adjacent to Block 7 to provide a 15-foot sidewalk; and
- 5 feet on the north side of Weddington Avenue adjacent to the easterly portion of Block 8.

The Project requests a vacation of the following ROW to reduce streets to their standard ROW:

- 10 feet on the south side of Cumpston Avenue adjacent to the East Site;
- 5 feet on the north side of Weddington Avenue adjacent to the westerly portion of Block 8; and
- 10 feet on the east side of Bakman Avenue adjacent to Block 8.

Finally, the Project requests a waiver of dedication requirements on the following streets:

- Chandler Boulevard (North)—Chandler Boulevard (North) is a designated Boulevard II but, with the Project, would have a modified use with a set of sawtooth bus parking spaces on the south curb, an eastbound bus-only lane, a single mixed-flow westbound travel lane, a westbound bicycle lane. The Project proposes that the existing 80-foot total ROW be maintained (compared with the Boulevard II standard of 110 feet), which would include minimum 15-foot wide sidewalks on both sides of the street (consistent with Boulevard II standards) and approximately 50 feet for the aforementioned uses of the roadway (30 feet less than Boulevard II standards). Thus, a waiver is requested for both the south side of the street adjacent to Block 0 West and the north side of the street adjacent to Block 7.

- Chandler Boulevard (South)—Chandler Boulevard (South) is a designated Boulevard II, but with the Project the north curb would provide a set of sawtooth bus parking spaces on Block 0. The Project proposes that the existing 45-foot half-ROW be maintained on the north side of the street (compared with the Boulevard II standard of 55 feet). There would be a sidewalk on Metro property exceeding the 15 feet required for Boulevard II standards.

- Lankershim Boulevard— Boulevard II standards require a sidewalk width of 15 feet, where the existing public ROW on Lankershim Boulevard adjacent to the Project Site (including Block 0 West and Block 8 on the west side of Lankershim Boulevard and all of the East Site) only provides 10 feet for sidewalks. The property along Project frontage contains existing Metro equipment in the ground and therefore cannot be dedicated to the City. However, the Project Site would provide additional sidewalk width on Project property, which would at all locations meet or exceed 15 feet in total width, therefore, meeting or exceeding Boulevard II standards.

- Tujunga Avenue—The east half of Tujunga Avenue adjacent to Block 0 requires a half-roadway width of 28 feet and a sidewalk width of 15 feet (43 feet total half-ROW). The current half-ROW is 47 feet, including a 40-foot roadway and seven-foot sidewalk; it therefore exceeds the total half-ROW requirement but does not provide a 15-foot sidewalk. However, the Consolidated Transit Center would provide additional sidewalk width on Metro property, in total meeting or exceeding the 15 feet required for Arterial II standards.

Each of the locations where waivers of dedications are requested remains consistent with the intent of the Mobility Plan street designations, and in all cases the Project would maintain publicly accessible sidewalks that meet or exceed the street designation standard.[13] Chandler Boulevard (North) and (South) are considered a single Boulevard II in the Mobility Plan, requiring 110 feet of right-of-way combined. With the Project, the two sections together would provide far more than 110 feet of right-of-way required for the Boulevard II standard and the sidewalk width standards would be met via the use of Project property as necessary. On Lankershim Boulevard, the 80-foot roadway width meets Mobility Plan standards for a Boulevard II, and the sidewalk width standards would be met via the use of Project property as necessary. On Tujunga Avenue, the half-roadway and half-right-of-way both exceed Mobility Plan standards, and the sidewalk width standard would be met via the use of Project property as necessary. Therefore, the

[13] *In connection with Metro's self-permitting authority under Government Code Section 53090 et. seq., the East Lot, West Lot, Block 0 West, and Block 0 East would not be subject to street dedication and improvement requirements. However, because Block 0 West and Block 0 East would be within the Project's Specific Plan, which would identify resulting adjacent right of way widths, analysis regarding why dedications or improvements are not being provided along these Metro blocks is provided here.*

waivers would not negatively affect the City's ability to meet its long-term mobility needs as defined in the Mobility Plan.

Additionally, pursuant to Project Design Feature TR-PDF-1, the Project would prepare a construction traffic management plan, which would include detour routes as necessary during construction.

As detailed in Table B-1 of the Transportation Study and summarized above, the Project is consistent with all applicable policies of the Mobility Plan and the Project does not interfere with other policies identified in the Mobility Plan. Therefore, the Project is consistent with the Mobility Plan.

(b) 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) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table B-2 in the Transportation Study included as Appendix R.1 of this Draft EIR. In summary, the Project would promote healthy living as a pedestrian- and transit-oriented mixed-use development where active travel modes are encouraged, including the provision of new transit and bike facilities, and community amenities, such as publicly accessible Promenade, Transit Square, and NoHo Square. It is organized around a network of small blocks connecting publicly accessible open spaces with activated ground-floor street frontages to create a high-quality pedestrian experience. It would provide dedicated curb-side passenger loading areas within and adjacent to the Project Site. The Project would support multi-mobility options through the provision of secure parking for up to 166 bicycles at one or more Metro Bike Hubs as well as designated locations for Metro's Bikeshare short-term rental program or similar first mile/last mile transit options. The Project would also provide new or maintained (i.e., restriped) pedestrian crosswalks at a variety of locations and modify westbound bicycle infrastructure on Chandler Boulevard, including the development of a new two-way bicycle route through the Project Site.

The Project would also provide 311 affordable housing units and would provide employment and entrepreneurial opportunities through the office, retail, and restaurant space at the Project Site. The commercial uses would serve Project residents and employees, transit riders, and the surrounding community, and would be easily accessed by pedestrians and bicyclists. Finally, the Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as discussed further

below. Furthermore, it would implement TDM elements described above to further reduce VMT per capita. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.

The above discussion highlights characteristics that specifically support policies in the Plan for a Healthy Los Angeles, as detailed in Table B-2 in Appendix R.1. The Project prioritizes safety and access for all individuals utilizing the Project Site and does not hinder other goals and policies identified in the Plan for a Healthy Los Angeles. Therefore, the Project is consistent with and would not obstruct the implementation of the policies recommended by the Plan for a Healthy Los Angeles.

(c) Specific Plans

The Project is not located within an area currently governed by a Specific Plan. However, the Applicant seeks the establishment of the District NoHo Specific Plan through the Project entitlement process.

(d) LAMC Section 12.21 A.16 (Bicycle Parking)

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. The Project's bicycle parking requirement is 1,116 spaces. The Project would provide up to 1,158 bicycle parking spaces for residential, retail, and office users (including 970 long-term and 188 short-term spaces). Although the Project would be located within the District NoHo Specific Plan area, it would meet the LAMC requirements for on-site bicycle parking supply, subject to any permissible reductions available under the LAMC or alternative compliance, such as bike share programs, authorized under the Specific Plan. Additionally, beyond the LAMC requirements, the Project would also provide up to 166 secure bicycle parking spaces for transit riders at one or more Metro Bike Hubs**.**

(e) LAMC Section 12.26 J (TDM Ordinance)

LAMC Section 12.26 J, the TDM Ordinance[14] establishes TDM requirements for non-residential projects. Key requirements of the TDM Ordinance include providing carpool / vanpool loading areas, walkways between buildings and public sidewalks, and improving adjacent bus stops to the satisfaction of local transit agencies. The Project proposes to implement a comprehensive TDM program consistent with the purpose and intent of the TDM Ordinance and consisting of the following basic elements:

- Reduced parking supply

[14] *Ordinance No. 168,700, effective March 31, 1993.*

- TDM promotions and marketing
- Pedestrian network improvements
- Implement on-street bicycle facilities
- Bicycle parking per LAMC

The Project also includes extensive pedestrian connectivity and support for public transit through the development of the Consolidated Transit Center. The East Site provides several on-street loading areas, and Block 8 (which is an office building) would provide space for carpool and vanpool parking and loading within the parking structure under the office. The Project would, thus, not conflict with the current TDM ordinance.

It should be noted that while not yet adopted, a draft of the City's updated TDM ordinance was released in June 2021. It requires more comprehensive TDM programs and applies to a broader range of development projects. The TDM measures to be incorporated into the Project's TDM program meet the requirements of the draft updated TDM ordinance, as currently drafted. Additionally, the Project would incorporate TDM monitoring and reporting in compliance with the updated TDM Ordinance.

(f) Digital Signage (LAMC Section 14.4.5 A and CVC Section 21466.5)

LAMC Section 14.4.5 A states that no sign or sign support structure shall be erected, constructed, painted or maintained, and no permit shall be issued, if the sign or sign support structure, because of its location, size, nature or type, constitutes a hazard to the safe and efficient operation of vehicles upon a street or a freeway, or which creates a condition that endangers the safety of persons or property. All digital signage visible from surrounding roadways would comply with this requirement and the Project would not conflict with LAMC Section 14.4.5 A.

CVC Section 21466.5 provides lighting thresholds to ensure lighting does not impair the vision of drivers upon the highway. Specifically, the maximum measured brightness of a light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the maximum measured brightness in the driver's field of view, with certain exceptions. All digital signage visible from surrounding roadways would comply with this requirement and the Project would not conflict with CVC Section 21466.5.

(g) Vision Zero Action Plan/Vision Zero Corridor Plans

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025. Vision Zero identified Lankershim Boulevard as part of its High Injury Network, a network of streets where strategic investments will have the biggest impact in

reducing death and severe injury. Annually developed Action Plans emphasize creating safe streets for all users, developing a culture of safety, adopting policy measures to promote safety, and use data to inform the most effective solutions.[15]

Based on the 2018 Action Plan, Lankershim Boulevard between Chandler Boulevard and Victory Boulevard (approximately 1.4 miles to the north) is designated as one of 40 Priority Corridors for Vision Zero improvements. As part of the Phase 1 improvements for that corridor, LADOT already installed 16 continental crosswalks, which are a type of high visibility crosswalk characterized by a "ladder" striping plan. Phase 2 will include signal upgrades at the intersection of Lankershim Boulevard & Burbank Boulevard and the installation of a protected left-turn signal on the northbound left-turn movement at Lankershim Boulevard & Chandler Boulevard (North). The latter intersection would be further modified by the Project with the installation of the Consolidated Transit Center; however, the Project would not interfere with the implementation of this or any other improvements in the future. Rather, the Project would support such improvements through crosswalk improvements and new lighting.

(h) Streetscape Plans

There are no existing streetscape plans near the Project Site, and, therefore, streetscape plans do not apply to the Project. The Project proposes a uniform streetscape for the public rights of way fronting the Project Site, which is intended to promote a balanced approach to all modes of transportation and provide safe and adequate space for sidewalks, bicycle paths, transit, parking, vehicular traffic, street trees, landscaping, lighting, and street furnishings.

(i) Citywide Design Guidelines

The Citywide Design Guidelines identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The Design Guidelines are organized around three design approaches: pedestrian-first design, 360-degree design, and climate-adapted design.

The policies that are applicable to this analysis are those under pedestrian-first design, and the Project's consistency with those policies are discussed in detail in Table B-3 in Appendix R.1. In summary, the Project specifically prioritizes and enhances the pedestrian experience through its design. It would provide a network of sidewalks with a

[15] *The information from this review comes from Vision Zero Los Angeles: 2018 Action Plan + Progress Report and LADOT's list of active Vision Zero projects maintained at www.ladotlivablestreets.org.*

minimum width of 12 feet, organized around a system of small blocks connecting publicly accessible open space. The sidewalks would be lined with trees and pedestrian lighting. Lankershim Boulevard and District Way would be entirely free from parking garage and service access, allowing uninterrupted pedestrian and bicycle circulation, and the only access point on Chandler Boulevard would be to the East Lot[16]. The Project is consistent with all applicable policies of the Design Guidelines.

(j) Conclusion

As summarized above and detailed in Appendix R.1 of this Draft EIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

(2) Mitigation Measures

Impacts with respect to conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts with respect to conflicts with plans 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

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's proposed land uses and their respective sizes as the primary input. As noted above, both Phase 1 and Full Buildout of the Project were analyzed, as well as individual land uses. Results are shown in Table IV.K-1 on page IV.K-40 and discussed in detail below.

[16] *The existing access to the East Lot is also located on Chandler Boulevard.*

Table IV.K-1
VMT Analysis

Analysis Scenario	Residential VMT per Capita	Residential VMT Threshold	Impact (Y/N)	Work VMT per Employee	Work VMT Threshold	Impact (Y/N)
Phase 1 without TDM Measures	4.8	9.4	**No**	10.4	11.6	**No**
Phase 1 with TDM Measures	4.1	9.4	**No**	8.9	11.6	**No**
Full Buildout without TDM Measures	5.3	9.4	**No**	10.4	11.6	**No**
Full Buildout with TDM Measures	4.5	9.4	**No**	8.7	11.6	**No**
Phase 1 Residential and Office Uses	4.1 (affordable housing)/ 6.1 (market rate housing)	9.4	**No**	10.2	11.6	**No**
Full Buildout Residential and Office Uses	4.0 (affordable housing)/ 6.1 (market rate housing)	9.4	**No**	10.2	11.6	**No**

Source: Gibson Transportation Consultants, 2021.

(a) Phase 1

(i) Phase 1 without TDM Measures

Phase 1 is estimated to generate 79,534 total daily VMT without incorporation of TDM measures. It would produce 6,669 home-based production VMT (used to calculate household VMT per capita) and 26,498 home-based work attraction VMT (used to calculate work VMT per employee). Based on the estimate of 1,375 residents, Phase 1 would generate average household VMT per capita of 4.8, which is less than the South Valley APC impact threshold of 9.4 and, therefore, would not result in a significant VMT impact. Based on the estimate of 2,545 employees, Phase 1 would generate average work VMT per employee of 10.4, which is less than the South Valley APC impact threshold of 11.6 and, therefore, would also not result in a significant VMT impact.

(ii) Phase 1 with TDM Measures

When accounting for the Project's TDM measures included in Project Design Feature TR-PDF-2, as well as bicycle parking per code which is an available reduction in the VMT Calculator, Phase 1 is estimated to generate 67,913 total daily VMT (a reduction of 11,621 daily VMT compared to Phase 1 without TDM Measures). It would produce

5,695 home-based production VMT and 22,626 home-based work attraction VMT. Based on the estimate of 1,375 residents and 2,545 employees, Phase 1 would generate average household VMT per capita of 4.1 and average work VMT per employee of 8.9. Therefore, with the TDM measures, the VMT impact of Phase 1 would be reduced lower than the less-than-significant levels prior to incorporation of TDM.

(b) Full Buildout

(i) Full Buildout without TDM Measures

Full Buildout of the Project is estimated to generate 123,802 total daily VMT without incorporation of TDM measures.[17] It would produce 19,785 home-based production VMT and 27,938 home-based work attraction VMT. Based on the estimate of 3,717 residents, Full Buildout would generate average household VMT per capita of 5.3, which is less than the South Valley APC impact threshold of 9.4 and, therefore, would not result in a significant VMT impact. Based on the estimate of 2,682 employees, Full Buildout would generate average work VMT per employee of 10.4, which is less than the South Valley APC impact threshold of 11.6 and, therefore, would also not result in a significant VMT impact.

(ii) Full Buildout with TDM Measures

When accounting for the Project's TDM measures included in Project Design Feature TR-PDF-2, as well as bicycle parking per code which is an available reduction in the VMT Calculator, Full Buildout of the Project is estimated to generate 103,775 total daily VMT (a reduction of 20,027 daily VMT compared to Full Buildout without TDM Measures).[18] It would produce 16,584 home-based production VMT and 23,419 home-based work attraction VMT. Based on the estimate of 3,717 residents and 2,682 employees, Full Buildout would generate average household VMT per capita of 4.5 and average work VMT per employee of 8.7. Therefore, with the TDM measures, the VMT impact of the Project at Full Buildout would be reduced even lower than the less-than-significant levels prior to incorporation of TDM.

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[17] *As discussed in Section II, Project Description, of this Draft EIR, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant. Under this scenario, without TDM measures, the Project would result in 98,100 total daily VMT, which would be 5.3 household VMT per capita and 9.9 work VMT per employee.*

[18] *As discussed in Section II, Project Description, of this Draft EIR, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant. Under this scenario, with TDM measures, the Project would result in 82,232 total daily VMT, which would be 4.5 household VMT per capita and 8.3 work VMT per employee.*

(c) Individual Land Use VMT

As noted above, the Project's land uses were also analyzed to determine if they could, individually (though accounting for internal trips within the Project's mix of land uses), result in a significant VMT impact. The residential uses (including, separately, affordable housing units and market-rate housing units) and office uses were analyzed quantitatively using the VMT Calculator for Phase 1 and Full Buildout of the Project. The retail and restaurant uses together were analyzed qualitatively because the VMT Calculator is not designed to analyze net change in VMT resulting from retail and restaurant uses.

To assess the VMT per capita associated specifically with, for example, the affordable housing units in the context of the larger mixed-use Project (i.e., accounting for trip reductions between uses within the Project Site), the VMT Calculator was run with and without the affordable housing while keeping the other land uses the same. In this manner, the two components of the VMT per capita calculation could be identified as the difference between the VMT Calculator output with and without the affordable housing. No TDM measures are included in this analysis.

(i) Phase 1, Residential and Office Uses

Affordable housing, market-rate housing, and office uses under Phase 1 were analyzed in the manner described above without accounting for any TDM measures. to show that, even without the VMT-reducing effects of the Project's TDM measures, none of the uses would result in significant VMT impacts. Each of the Phase 1 land uses would generate lower VMT per resident or VMT per employee than the South Valley APC impact thresholds of 9.4 and 11.6, respectively. Specifically, the affordable housing component would generate 4.1 VMT per resident, the market-rate housing component would generate 6.1 VMT per resident, and the office uses would generate 10.2 VMT per employee. Therefore, like Phase 1 with all land uses, the residential and office uses would not result in a significant VMT impact.

(ii) Full Buildout, Residential and Office Uses

Affordable housing, market-rate housing, and office uses upon Full Buildout of the Project were analyzed in the manner described above without accounting for any TDM measures that, even without the VMT-reducing effects of the Project's TDM measures, none of the uses would result in significant VMT impacts. Each of the Project land uses would generate lower VMT per resident or VMT per employee than the South Valley APC impact thresholds of 9.4 and 11.6, respectively. Specifically, the affordable housing component would generate 4.0 VMT per resident, the market-rate housing component would generate 6.1 VMT per resident, and the office uses would generate 10.2 VMT per employee. Therefore, like Full Buildout with all land uses, the residential and office uses would not result in a significant VMT impact.

(iii) Retail and Restaurant Uses

Notwithstanding that the Project does not fit the TAG's definition of a regional-serving retail project (i.e., each individual establishment is less than 50,000 square feet and is therefore considered local serving), a qualitative analysis was conducted to demonstrate that the Project's retail and restaurant uses would result in a net reduction in total VMT, consistent with the regional-serving retail project significance criteria in the TAG.

There are no regional-serving retail centers near the Project Site. Rather, there are linear commercial corridors, including Lankershim Boulevard and portions of Magnolia Boulevard and Burbank Boulevard, which provide un-concentrated[19] commercial uses similar to those proposed by the Project. Importantly, while the area near the Project Site has experienced a substantial increase in the number of residential units over the past decade, there has not been a corresponding increase in the amount of retail and restaurant development to support the increase in residential uses in the area. Furthermore, the related projects include development of over 2,152 additional residential units near the Project Site, also without a commensurate increase in commercial space. The Project would provide a substantial increase in the amount and variety of available goods, services, and dining options and, as a result, would help to keep resident trips local, thus reducing VMT. Additional patronage by Project residents, employees, and transit riders at the Project Site would not generate any VMT, and the Project's inclusion of retail and restaurant space would specifically reduce VMT associated with the Project's office and residential uses.

(2) Mitigation Measures

Impacts with respect to VMT under all analyzed scenarios would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts with respect to VMT under all analyzed scenarios 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)?

[19] *Un-concentrated commercial uses include linear, low-density retail along a street rather than a shopping mall with hundreds of thousands of square feet of retail are concentrated together.*

(1) Impact Analysis

As discussed above, the TAG requires that the determination of significance should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design) while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions, such as curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program.

(a) Consistency with Driveway Design Guidelines

(i) Driveway Placement

Project access is concentrated on non-arterial streets, consistent with the MPP, and all commercial loading driveways are located on local or private drives (Refer to Figure 4 of the Transportation Study). All vehicular access to the East Site is provided on Cumpston Street (a collector), Fair Avenue (a local street), or Elmer Avenue and Klump Avenue (publicly accessible private drives constructed by the Project). Additionally, access to Klump Avenue is provided from Chandler Boulevard (a Boulevard II), though this access point would be designed as a standard intersection rather than a driveway. Vehicular access to Block 7 would be via the alley on the north side of the building. Vehicular access to Block 8 would be via Weddington Avenue (inbound) and Bakman Avenue (outbound).

Vehicular access points were only located on arterial streets when there was no feasible alternative. Block 0, the Consolidated Transit Center, is surrounded by arterial streets on all sides. It would continue to provide access for the Metro G (Orange) Line busway from Tujunga Avenue. The West Lot also only has frontage on arterial streets and would provide two access points on Chandler Boulevard (North). The East Lot's only non-arterial frontage is a short stretch on Fair Avenue. It would provide a full-access driveway on Chandler Boulevard and an exit-only driveway to Fair Avenue, a local street.

(ii) Driveway Spacing

Under LADOT MPP Section 321, driveways should be spaced at least 50 feet apart when feasible. The Project's driveways generally are spaced at least 50 feet apart from one another, except for in certain cases where this is infeasible. Blocks 3 and 4 each provide two driveways on Klump Avenue that are separated by approximately 40 feet. The northern driveway of each Block leads directly to a ramp to subterranean parking for residents and the southern driveway leads to a limited number of at-grade parking spaces. On Block 3, the southern driveway serves 40 spaces for Metro riders. On Block 4, the southern driveway serves 16 spaces for retail customers, along with providing a secondary access to a ramp to above-grade residential parking. The City's driveway spacing guidelines are intended to reduce potential safety issues resulting from simultaneous

access to and from nearby driveways. The two instances of 40-foot driveway spacing on Blocks 3 and 4 would not result in these types of hazards for two reasons. First, in each case, one of the driveways serves a small number of parking spaces, minimizing the frequency with which vehicles would be exiting both driveways at the same time. Second, traffic speeds and volumes on Klump Avenue would be low for several reasons: it would be a neighborhood street with a posted speed limit of 25 mph and no utility as a bypass route, it would be less than 30 feet wide (compared to a public local street with a standard width of 36 feet) and, therefore, drivers may drive even more slowly out of caution, and the blocks are too short (between 240 feet and 320 feet between stop signs) to allow higher speeds. Combined with the fact that the 40-foot spacing is only a minor deviation from the recommended 50-foot spacing, these driveways would not result in safety hazards.

Under LADOT MPP Section 321, residential driveways serving more than 25 parking spaces and all commercial driveways should be 28 feet wide for two-way traffic and 16 feet wide for one-way traffic. Driveways to accommodate commercial vehicles or multiple lanes may be wider as determined by LADOT, based on a turning radius analysis or operational analysis, and driveways may be narrower if site conditions require it. Blocks 1, 5/6, and 8 each have commercial loading access located immediately adjacent to a general vehicular driveway. This results in approximately 60-foot curb cuts, where the curb is graded down to the adjacent street, on Elmer Avenue (to Block 1), Klump Avenue (to Block 5/6), and Weddington Street (to Block 8). The locations of these commercial loading access points were identified as the only feasible way to meet the design goals of the Project, including the minimization of vehicular access points that would otherwise interfere with ground-floor parking, divide ground-floor commercial frontage into multiple smaller blocks, or otherwise conflict with sound pedestrian-first design. Each pair of driveways would have a physical barrier (in the form of concrete column supports between two and five feet wide) between them. Though these curb cuts are wider than the standards in the MPP, the commercial loading driveways would be used only infrequently, generally outside of peak hours, and generally by large vehicles (i.e., highly visible and audible) with professional drivers, and LADOT has approved the Transportation Analysis concluding this does not constitute a hazardous geometric design feature. Therefore, the loading access sides of these curb cuts would function similarly to standard sidewalk and the Project would be ADA compliant. Therefore, the wide curb cuts would not result in a hazard.

(iii) Driveway Design

Generally, the driveways would be at or below the maximum width designated in the MPP. The following driveways would include minor exceptions, which would not result in unusual safety hazards:

- Certain locations noted above (at Blocks 1, 5/6, and 8) would have commercial loading driveways adjacent to general vehicular driveways and, thus, have wider

curb cuts (over 50 feet total each) divided in the middle by physical barriers. The commercial loading driveways would be infrequently used by professional drivers trained to use extreme caution when entering and exiting loading areas (using vehicles equipped with back-up alerts).

- On Cumpston Street, the one-way entry and exit driveways to the passenger loading and parking area for Block 1 residents would be 16 feet and 20 feet wide, respectively, compared with a 16-foot standard in the MPP. The wider exit driveway would be to ensure that any vehicle that enters the passenger loading and parking area can safely maneuver back to Cumpston Street.

- The one-way entry and exit driveways to Block 8 on Weddington Street and Bakman Avenue, respectively, would be 24 feet wide as each would provide two lanes (the exit driveway would provide one lane for left-turns and one lane for right-turns). Because these one-way driveways would not serve opposing traffic, in which the turning radius of an inbound vehicle may conflict with a vehicle waiting to depart, the typical width of 28 feet is unnecessary for safe access.

- The driveway to Block 0 West on Tujunga Avenue, which is for Metro use only, would be 50 feet wide to accommodate the wide turning radii of transit buses. Metro bus drivers are subject to rigorous safety training, and their contracts include strict zero tolerance for even minor accidents. Additionally, the driveway on Tujunga Avenue would be controlled when a bus passes through by gate arms installed during Project construction as part of the Metro G (Orange) Line Improvements Project. Therefore, this driveway width would not be hazardous for pedestrians.

Additionally, some of the driveways may be narrower than the MPP recommends for two-way traffic, though the precise widths of the curb cuts have not yet been determined. In general, narrowed driveways provide greater comfort for pedestrians and bicyclists on the sidewalk, and, therefore, these conditions would also not result in an unusual safety hazard.

(iv) Driveway Obstacles

No unusual obstacles are presented in the design of the driveways that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians. All roads are straight and flat, and driveways meet the roadways at right angles. In some cases, the driveways are lined with solid walls stretching to the sidewalk, impeding direct visibility to the sidewalk. However, at these locations, passive safety systems, such as convex mirrors, would be installed to improve visibility for both drivers and pedestrians.

The driveways are, and, upon further refinement of plans during the building permit application process, would be designed according to building code and other LADOT standards. They would be reviewed by the City of Los Angeles Department of Building and

Safety, Bureau of Engineering, and, where appropriate, LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design.

(b) Internal Circulation

The Project includes construction of three internal private drives, including the shared street District Way and extensions of Elmer Avenue and Klump Avenue. These streets would be designed to incorporate all applicable safety standards and features. They would incorporate visual cues to reinforce the feel of a low-speed, multi-modal neighborhood. All intersections would meet at right angles, providing sufficient sight distance for vehicles, and there would be 12-foot sidewalks and short crossing distances for pedestrians, minimizing potential hazards.

(c) Pedestrian Access and Facilities

The Project's design minimizes potential hazards to pedestrians by concentrating access for those users away from the vehicular access points, including pedestrian and bicyclists, as discussed further below.

(i) Pedestrian Access and Traffic

The Project would provide dedicated pedestrian access separate from vehicular access points at all Blocks. While vehicular access for the East Site is concentrated on Klump Avenue (along with limited access on Cumpston Street, Elmer Avenue, and Fair Avenue), pedestrian access is concentrated on District Way, a shared street through the Project Site. Pedestrian trip generation estimates are provided in Figure 12 of the Transportation Study.

(ii) Pedestrian Paths of Travel

Pedestrian paths of travel would be routed away from vehicle traffic to the extent possible. Figure 12 of the Transportation Study also shows the anticipated pedestrian travel routes for Project traffic within and in the immediate vicinity of the Project Site. Most pedestrian trips would either be internal trips within the Project Site or trips between Project uses and the Consolidated Transit Center. As shown in Figure 12, the vast majority of pedestrians traveling to, from, or within the Project Site are not expected to walk across Project vehicular access points. Instead, pedestrian trips are concentrated on District Way, Chandler Boulevard (especially between the East Lot and West Lot, the Consolidated Transit Center, and the Metro B (Red) Line subway portals), and on Lankershim Boulevard. Many pedestrians would cross Lankershim Boulevard, though pedestrians would have the option to cross under Lankershim Boulevard due to the reconfiguration of the Metro B (Red) Line fare gates to allow free undercrossing between Block 0 West (the Consolidated Transit Center) and Block 0 East (within the East Site).

As Figure 12 shows, the only access point with substantial levels of pedestrian cross traffic would be the Metro G (Orange) Line busway entry/exit on Tujunga Avenue. However, this driveway is signalized, and pedestrians would only cross on a walk signal as at a standard intersection crosswalk. Furthermore, bus traffic would be controlled as there is no private passenger vehicle traffic in an exclusive busway. Therefore, this would not result in a hazardous conflict.

(iii) Pedestrian Amenities

In addition to reconfiguring the Metro B (Red) Line fare gates, pursuant to Project Design Feature TR-PDF-2, the Project also proposes to install new continental crosswalks across Lankershim Boulevard at the south side of Chandler Boulevard (North), across Tujunga Avenue at the south side of Chandler Boulevard (North) and the north side of Chandler Boulevard (South), and across District Way at the west side of Fair Avenue. The Project would also repaint one or more existing crosswalks that could be affected by Project construction at each of the following locations:

- Tujunga Avenue & Chandler Boulevard (North)
- Tujunga Avenue & Chandler Boulevard (South)
- Lankershim Boulevard & Chandler Boulevard (North)
- Lankershim Boulevard & Chandler Boulevard (South)
- Across the Block 0 West access points on Chandler Boulevard (South) and Tujunga Avenue

These amenities would also serve to reduce hazardous conflicts between vehicles and pedestrians.

(d) Bicycle Access

The Project's design also minimizes potential hazards to bicyclists by concentrating bicycle circulation and parking access away from the vehicular access points. The Project would provide facilities for bicyclists that avoid arterial streets (i.e., District Way through the Project Site), install Class IV bicycle lanes on Fair Avenue (between District Way and Chandler Boulevard) and Chandler Boulevard (North) and a bicycle crossing signal on Lankershim Boulevard at Chandler Boulevard (North), and allow for installation of protected bicycle lanes westbound on Chandler Boulevard and northbound on Lankershim Boulevard to Chandler Boulevard (North). The existing eastbound bicycle facility on Chandler Boulevard (South) between Tujunga Avenue and Vineland Avenue would not be affected

by the Project. The Project's proposed bicycle facilities are shown in Figure 6 of the Transportation Study.

Additionally, at nearly every Block, the Project would provide long-term and short-term bicycle parking directly accessible to the sidewalk rather than through the vehicular parking lots or structures. The only exceptions are Block 4, where a portion of the bicycle parking would be provided within the at-grade parking level accessed through one of the vehicular driveways, and Block 8, where the bicycle parking room would be accessible both through the building lobby and through the vehicular driveways.

(e) Vision Zero

Lankershim Boulevard and Vineland Avenue, both of which run adjacent to portions of the Project Site, are part of the Vision Zero High Injury Network, where injuries resulting from collisions between vehicles and pedestrians, bicyclists, or other vehicles are most common. As discussed above, Lankershim Boulevard is also designated as a Priority Corridor for Vision Zero improvements. Phase 1 of the Lankershim Boulevard Priority Corridor project was previously completed. Under Phase 2 of that project, the City will install a protected left-turn signal on the northbound left-turn movement at Lankershim Boulevard and Chandler Boulevard (North). The Project would not interfere with implementation of this signal improvement. Furthermore, the Project would provide minimum 15 feet sidewalks on each side of Lankershim Boulevard adjacent to Project Site frontage, consistent with Mobility Plan standards, helping to improve safety for the most vulnerable roadway users.

(f) Safe Routes to School

Lankershim Elementary School is located on Bakman Avenue south of Weddington Street (south of Block 8). Its Safe Routes to School map is included as Figure 13 of the Transportation Study and includes all crosswalks near the Project Site, as well as crossing guards during school start and end times at the Project-adjacent intersections of Lankershim Boulevard and Chandler Boulevard (North) and Bakman Avenue and Weddington Street. The Project would not directly affect access to Lankershim Elementary School but would add vehicular traffic to the area and to specific Project access points, some of which are along routes students may take to walk to and from the school. It is important to note that at Block 8, nearest to Lankershim Elementary School, there are currently two driveways on Bakman Avenue and one on Weddington Street. With the Project, there would be one outbound-only driveway on Bakman Avenue and one curb-cut serving commercial loading purposes alongside inbound-only traffic to the parking structure on Weddington Street. The driveways would be designed in accordance with the MPP and the sidewalks adjacent to Project Site frontage would meet or exceed Mobility Plan

standard widths. Therefore, the Project would not result in a significant safety hazard to students.

(g) Freeway Safety Analysis

As previously discussed, LADOT issued Interim Guidance for Freeway Safety Analysis in May 2020 (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 identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. Based on the Project's trip generation estimates and traffic distribution pattern detailed in Chapter 9 of the Transportation Study, which was reviewed and approved by LADOT as part of the Project's MOU, the Project under Full Buildout would add 25 or more peak hour trips to five off-ramps:

- SR-170 Southbound Off-ramp to Burbank Boulevard (Intersection #1)
- SR-170 Southbound Off-ramp to Magnolia Boulevard (Intersection #27)
- SR-170 Northbound Off-ramp to Magnolia Boulevard (Intersection #28)
- US-101 Eastbound Off-ramp to Tujunga Avenue (Intersection #35)
- SR-134 Westbound Off-ramp to Lankershim Boulevard (Intersection #37)

The 95th percentile ramp queue was calculated using the Highway Capacity Manual, 6th Edition methodology used. It incorporated signal timing data provided by the City for each of the signalized off-ramp intersections. Conditions were analyzed with and without Project Phase 1 traffic in year 2025 and with and without Full Buildout of the Project in year 2037 based on the traffic volumes developed in the Transportation Study. The queue lengths and off-ramp storage length are shown in Transportation Study Tables 15 and 16 for year 2025 and 2037, respectively. Highway Capacity Manual worksheets are provided in Appendix E of the Transportation Study.

Under Future with Phase 1 Conditions (year 2025) and Future with Buildout Conditions (year 2037), none of the queues would exceed the ramp storage length during either peak hour. Therefore, further evaluation of the significance criteria is not necessary at any location. The Project would not result in a significant impact, and no mitigation measures are required based on Phase 1 or Full Buildout Project traffic.

(h) Conclusion

Based on the above, the Project does not present any hazardous geometric design features related to traffic movement, mobility, or pedestrian accessibility. Impacts would be less than significant.

(2) Mitigation Measures

Impacts with respect to hazardous geometric design features would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts with respect to hazardous geometric design features were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the Los Angeles Police Department (LAPD) in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. The nearest disaster route to the Project Site is Lankershim Boulevard, which bisects the Project Site.[20]

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 Lankershim Boulevard and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, with implementation of the Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-1, emergency access would not be impeded. The Project's Construction Traffic Management Plan would

[20] *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

require review and 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 route along Lankershim Boulevard. Therefore, impacts to emergency access, including emergency routes, during construction of the Project would be less than significant.

(b) Operation

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 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 LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. 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 North 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-3. Furthermore, pursuant to CVC 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 and the Project would not result in inadequate emergency access during operation of the Project.

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

(2) Mitigation Measures

Impacts with respect to emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts with respect 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 within 0.25 mile of the Project Site and any transportation system improvements in the vicinity. As indicated in Table III-1 in Section III, Environmental Setting, of this Draft EIR, 22 of the 34 related projects (i.e., Related Projects Nos. 1 through 22) are located within a 0.25-mile radius of the Project Site.

The majority of the programs, plans, policies, and ordinances reviewed under Threshold (a) 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. Individual projects would also be required to resolve any conflicts with the pedestrian enhanced network and bicycle enhanced network. Also, in many cases, the Project would specifically support key policies, such as enhancing pedestrian infrastructure, while the nearby related projects would not be expected to 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. Collectively, the Project and the related projects would represent infill development and would add high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity, which would satisfy many of the applicable transportation plans and policies. Lastly, as indicated in the analysis under Threshold (a) above, the Project would be consistent with the applicable transportation plans and policies. **As such, the Project's transportation plan consistency impacts would not be cumulatively considerable, and, thus, cumulative transportation plan consistency impacts would be less than significant.**

(b) Vehicle Miles Traveled

Per the TAG, if a project had a project-level VMT impact, then a consistency analysis of the RTP/SCS would determine whether a significant cumulative impact exists.

Consequently, a development project would have a cumulative VMT impact if it were deemed inconsistent with SCAG's RTP/SCS, the regional plan to reach state air quality and greenhouse gas reduction targets. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the RTP/SCS, and therefore would also have no cumulative VMT impact. As previously discussed, the Project would not have a project-level impact on VMT and therefore does not have a cumulative VMT impact.

Additionally, as described in detail above, the Project's retail and restaurant are local-serving, and would not result in a net increase in VMT. The Project's retail and restaurant space are spread over seven blocks with individual parking areas, separated by streets. It does not concentrate retail and restaurant uses into a contiguous center and lacks both the concentration of uses and amount of leasable space to draw significant numbers of patrons from beyond a local area. When considered with the related projects, most of which propose additional residential development near to the Project Site, the Project would help to provide local retail and dining options to the many new residents (and office employees, primarily from the Project itself) in the area.

Therefore, Project impacts with respect to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.

(c) Hazardous Geometric Design Features

According to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts. However, there are no related projects within the same blocks as the Project. Furthermore, as discussed above, the Project would not result in a significant impact associated with hazardous geometric design features. In addition, per LADOT's Interim Guidance for Freeway Safety Analysis, a project would not have the potential to result in significant freeway safety unless it adds 25 or more trips to any off ramp in either the morning or afternoon peak hour. Although the Project would exceed this screening threshold at five off-ramps, as discussed above, under both Future with Phase 1 Conditions (year 2025) and Future with Buildout Conditions (year 2037), none of the queues would exceed the ramp storage length during either peak hour. Project-level impacts to freeway safety would be less than significant, and therefore, the Project would not make a considerable contribution to cumulative freeway safety impacts. **Therefore, Project impacts with respect to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(d) Emergency Access

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. 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 LAMC Section 57.118, 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 CVC 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. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. **Therefore, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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