

IV. Environmental Impact Analysis

I. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is primarily based on the *Transportation Assessment for the Artisan Hollywood Project* (Transportation Assessment)¹ prepared for the Project, and included in its entirety in Appendix I of this Draft EIR.

The analysis of Vehicle Miles Traveled (VMT) is based on the VMT Analysis Worksheets included as an Addendum² to the Transportation Assessment. The Transportation Assessment and Transportation Addendum were prepared pursuant to LADOT's *Transportation Assessment Guidelines* (July 2020) which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment and the Addendum (herein referred to collectively as the Transportation Assessment), was approved by LADOT on March 9, 2021. A copy of LADOT's Assessment Letter for the Transportation Assessment is included in Appendix I of this Draft EIR.

¹ Gibson Transportation Consulting, Inc, *Transportation Assessment for the Artisan Hollywood Project*, December 2020.

² The Transportation Addendum includes a revised Appendix D of the Transportation Assessment, with updated VMT Analysis Worksheets. The worksheet inputs were amended to more accurately account for current conditions with regard to existing floor area that has been vacant for several years. The revised worksheets were reviewed by LADOT and are included as part of LADOT's Assessment Letter dated March 9, 2021. The Transportation Assessment and the Addendum are included in Appendix I of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Americans with Disabilities Act of 1990
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- 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
- Hollywood Community Plan
- Hollywood Redevelopment Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- LADOT Interim Guidance on Freeway Safety
- Citywide Design Guidelines
- Plan for a Healthy Los Angeles

(1) Federal

(a) Americans with Disabilities Act (ADA) of 1990

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

(2) State

(a) Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

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

(b) Assembly Bill 32 (AB 32) and Senate Bill 375 (SB 375).

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

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

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

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

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

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

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

(c) California Vehicle Code (CVC)

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

(d) Senate Bill (SB) 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new

criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.”

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which was released on August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

Based on these changes, on July 30, 2019, the City of Los Angeles City Council adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City’s formal method of evaluating a project’s transportation impacts. In conjunction with this update, LADOT adopted its *Transportation Assessment Guidelines* (TAG) in July 2019 and updated in July 2020, which defines the methodology for analyzing a project’s transportation impacts in accordance with SB 743.

(e) *CEQA Guidelines Section 15064.3*

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing

major transit stop³ or a stop along an existing high-quality transit corridor⁴ should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

(3) Regional

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

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

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG’s prior 2016–2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable

³ “Major transit stop” is defined in Public Resources Code Section (PRC) 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

⁴ “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.

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, 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, 2016.⁵ 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;

⁵ *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.*

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

Each of the goals contains objectives and policies to support the achievement of those goals.

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

- Arterial Streets: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
 - Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
 - Avenues pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- Collector Streets: Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.
- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
 - Continuous local streets that connect to other streets at both ends, and/or
 - Non-Continuous local streets that lead to a dead-end.

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the Bicycle Enhanced Network (BEN), Transit Enhanced Network (TEN), Vehicle Enhanced Network (VEN), and Neighborhood Enhanced Network (NEN). In addition to these

networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts (PED). These networks and PED are defined as follows:

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.
- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.
- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

(b) Hollywood Community Plan

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

The Project Site is located within the Hollywood Community Plan Area. The Community Plan includes the following transportation and circulation objective that is applicable to the Project:

Objective 6: To make provision for a circulation system coordinated with land use and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation services.

In addition, the Community Plan recognizes that the area contains major transportation corridors that serve other parts of the metropolitan area, and thus, must accommodate the transportation needs, including through a greatly improved public transportation system. The Community Plan also includes a program that aims to facilitate local traffic circulation, relieve congestion, and provide mobility for all citizens.

(c) Hollywood Redevelopment Plan

The Hollywood Redevelopment Plan sets forth the re-planning, redesign, and rehabilitation and/or development of areas in Hollywood that are stagnant or improperly utilized and could not be accomplished by private enterprise acting alone, without public participation and assistance. The Redevelopment Plan includes a goal (Goal 12) to support and encourage a circulation system that will improve the quality of life in Hollywood. In addition, transportation-related guidelines for the City, including circulation, parking, and loading facilities, are described in Section 518 of the Hollywood Redevelopment Plan. The Project is not located along a corridor that has been identified as a circulation corridor in the Hollywood Redevelopment Plan.

(d) 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. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

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.

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

⁶ Los Angeles Department of Transportation (LADOT), *Transportation Assessment Guidelines*.

the parking facility and users of the abutting street system, including the safety of pedestrians.

(g) Vision Zero

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

(h) Interim Guidance for Freeway Safety

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

(i) Citywide Design Guidelines

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

(j) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and

increase awareness of equity and environmental issues.⁷ The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b. Existing Conditions

(1) Project Site and Study Area

The Project Site is located at 1520–1542 North Cahuenga Boulevard, 1523–1549 North Ivar Avenue, and 6350 West Selma Avenue in the Hollywood community of Los Angeles. The Project Site is currently occupied by a surface parking area located in the northeast portion of the Project Site (Development Area) and six one- and two-story commercial structures located in the southern and western portions of the Project Site. The existing surface parking area includes approximately 84 parking spaces with vehicular access provided via a two-way driveway on Selma Avenue. The existing commercial structures contain approximately 33,828 square feet of floor area (approximately 29,828 square feet of which are presently occupied with tenants and approximately 4,000 square feet of which have been vacant since prior to 2018), providing a variety of retail, restaurant, and service uses, with pedestrian access to the various uses provided along Ivar Avenue, Cahuenga Boulevard, and Selma Avenue.

The study area includes key intersections along Ivar Avenue, as well as the transportation infrastructure described below. This study area was established in consultation with LADOT based on the following factors identified in the TAG:

- Primary driveway(s);
- Intersection at either end of the block on which the Project is located or up to 600 feet from the primary Project driveway;
- Unsignalized intersections adjacent to the Project Site that are integral to the Project Site access and circulation plan; and
- Signalized intersection in proximity to the Project Site where 100 or more Project trips would be added;

In addition, two signalized intersections, adjacent to and nearby the Project Site, were identified during the MOU process for detailed analysis of the above conditions. These intersections are:

⁷ *City of Los Angeles Department of City Planning, Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, 2015.*

- Intersection 1: Ivar Avenue and Selma Avenue; and
- Intersection 2: Ivar Avenue and Sunset Boulevard

(2) Street System

As shown in Figure IV.I-1 on page IV.I-15, 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.

(a) Freeways

As previously noted, primary regional access to the Project Site is provided by the Hollywood Freeway (US-101) which is accessible within 0.7 mile east and 0.5 mile north of the Project Site. US-101 runs in the southeast/northwest direction, extending from the East Los Angeles Interchange through Hollywood, the San Fernando Valley and beyond. In the vicinity of the study area, the Hollywood freeway provides four lanes in each direction. Access is provided via interchanges at Franklin Avenue and Argyle Avenue.

(b) 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, and illustrated in Figure IV.I-1, are the primary streets that provide local access to the Project Site.

- Ivar Avenue—Ivar Avenue is designated as a Local Street that runs in the north-south direction. It is located east of the Project Site and provides two travel lanes, one lane in each direction. Two-hour metered parking is available on both sides of the street.
- Cahuenga Boulevard—Cahuenga Boulevard is designated as a Modified Avenue II, located to the west of the Project Site, and runs in the north-south direction. Cahuenga Boulevard provides two lanes in each direction and left-turn lanes at most intersections. Two-hour metered parking is available on both sides of the street. Cahuenga Boulevard is part of the Neighborhood Enhanced Network and Pedestrian Enhanced District.
- Selma Avenue—Selma Avenue is designated as a Local Street that runs in the east-west direction. It is located north of the Project Site and provides two lanes, one lane in each direction. Bicycle routes are also provided along both sides of the street. Two-hour metered parking is generally available on both sides of the street. Selma Avenue is part of the Neighborhood Enhanced Network.



LEGEND

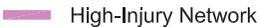
-  Project Site
-  High-Injury Network
-  Metro Rail Station
-  Mid-Block Crossing
-  Bicycle Route (Sharrow)
-  Bus Stop



Figure IV.I-1
Existing Street System in the Project Vicinity

Source: Gibson Transportation Consulting, Inc., 2021.

- Sunset Boulevard—Sunset Boulevard is designated as an Avenue I that runs in the east-west direction. It is located south of the Project Site with three lanes in each direction. Left-turn lanes are available at most intersections. Two-hour metered parking with peak hour restrictions is generally available on both sides of the street. Sunset Boulevard is part of the Pedestrian and Bicycle Lane Networks.

(3) Transit System

As previously discussed, the Project Site is located within a TPA, and within a Tier 3 TOC area. As shown in Figure IV.I-2 on page IV.I-17, the Project Site and greater study area are well served by public transit, including both bus and rail service. Metro operates the B Line subway which runs between North Hollywood and Downtown Los Angeles. The closest Metro B Line station to the Project Site is located at Hollywood Boulevard and Vine Street, located within 1,000 feet from the Project Site. Metro also provides several bus lines in the form of rapid and local bus service as well as shuttle service in the vicinity of the Project Site. LADOT Downtown Area Shuttle (DASH) also provides bus transit service in the area. The following provides a brief description of the transit lines providing service in the Project vicinity. For additional information on the transit lines operating in the vicinity of the Project Site, refer to Table 1 of the Transportation Assessment (Appendix I of this Draft EIR).

- Metro B Line—The B Line is a subway that provides service between North Hollywood and Downtown Los Angeles. This line runs north of the Project Site along Hollywood Boulevard. The B Line has average headways of 10 minutes during the weekday A.M. and P.M. peak periods. The B Line Hollywood/Vine station is less than 0.5 mile from the Project Site.
- Metro Line 2—Line 2 provides local service between downtown Los Angeles and the Westwood neighborhood in Los Angeles along Santa Monica Boulevard and Sunset Boulevard, north of the Project Site. Line 2 has average headways of 12 to 15 minutes during the weekday A.M. and P.M. peak periods.
- Metro Line 302—Line 302 follows the same route as Line 2 along Santa Monica Boulevard and Sunset Boulevard between downtown Los Angeles and Westwood but with limited hours. Line 302 has average headways of 11 to 14 minutes during the weekday A.M. and P.M. peak periods
- Metro Line 210—Line 210 provides local service between the Hollywood neighborhood in Los Angeles and Redondo Beach. This line runs east of the Project Site along Vine Street. Line 210 has average headways of 16 to 20 minutes during the weekday A.M. and P.M. peak periods.



LEGEND

-  Project Site
-  Metro Subway Station
-  Metro Local / Limited
-  Bus Stop
-  Metro B (Red) Line Subway
-  LADOT DASH



Figure IV.I-2
Existing Transit Service in the Project Vicinity

- LADOT DASH Hollywood/Wilshire—The Hollywood/Wilshire DASH provides circulator service in the Hollywood neighborhood in Los Angeles. There are several stops near the Project Site on Sunset Boulevard. The Hollywood/Wilshire DASH has average headways of 23 to 26 minutes during the weekday A.M. and P.M. peak periods.
- LADOT DASH Hollywood—The Hollywood DASH provides circulator service in the Hollywood neighborhood in Los Angeles. There are several stops near the Project Site on Hollywood Boulevard, Argyle Avenue (north of Hollywood Boulevard), Gower Street (south of Sunset Boulevard), and Fountain Avenue. The Hollywood DASH has average headways of 30 minutes during the weekday A.M. and P.M. peak periods.

(a) Ridership Capacity

Tables 2A and 2B in the Transportation Assessment, included in Appendix I of this Draft EIR, summarize the total capacity of the Metro transit system and LADOT lines during the morning and afternoon peak hours based on the frequency of service of each line and the maximum capacity of each bus or train. As indicated therein, the public transit system in the study area, including Metro rail service, Metro bus service, and the LADOT bus lines, currently provide a total additional capacity for 6,245 transit riders during the morning peak hour and 5,998 transit riders during the afternoon peak hour. For conservative purposes, bus lines with stop locations located more than a walking distance of 0.25 mile from the Project Site were not included.

(4) Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

The walkability of existing facilities is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile. These attributes are quantified and assigned a score out of 100 points. With the multitude of commercial businesses, employment, and cultural centers adjacent to residential neighborhoods, the walkability score given to the Project Site is 98 points.⁸ Also, as outlined in the Transportation Assessment, the sidewalks serving as routes to the Project Site provide proper connectivity and sufficient widths with tactile warning strips for ADA accessibility for a safe pedestrian environment. Adjacent to the Project Site, 10-foot-wide sidewalks are provided along Selma Avenue, and 12-foot-wide sidewalks are provided along Ivar Avenue.

⁸ *WalkScore.com rates the Project Site with a score of 98 of 100 possible points (scores accessed on May 20, 2020, for 1520 Cahuenga Boulevard). Walk Score calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel.*

(b) Bicycle Facilities

As shown in Figure IV.I-1 on page IV.I-15, within the immediate vicinity of the Project Site, bicycle routes with shared lane marking (referred to as “sharrows”) are provided along Selma Avenue. Additional bicycle lanes within 0.25 mile of the Project Site are provided along Wilcox Avenue, Vine Street, and Argyle Avenue, north of Selma Avenue.

(5) High Injury Network

As previously discussed, Vision Zero is a traffic safety policy that promotes strategies to eliminate transportation-related collisions that result in severe injury or death. Vision Zero has identified a HIN, a network of streets included based on collision data from the last five years, where strategic investments would have the biggest impact in reducing death and severe injury. As indicated in Figure IV.I-1, within the immediate vicinity of the Project Site, Selma Avenue, Sunset Boulevard, and Ivar Avenue south of Sunset Boulevard are identified in the HIN. In addition, as part of the Vision Zero Safety Improvements projects, LADOT has identified basic safety improvements (e.g., crosswalk upgrades, traffic signals, etc.) for implementation along certain corridors, including along Hollywood Boulevard and Sunset Boulevard in the vicinity of the Project Site.

c. Future Transportation Context

(1) Related Projects

The Transportation Assessment also considers the effects of other development proposals (related projects) that are 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 46 related projects were identified in the vicinity of the Project Site (i.e., within 0.5 mile), 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 may well be beyond the Project’s buildout year, and notwithstanding that some may not be approved or developed, all related projects were considered to contribute to cumulative future traffic in 2025, which is the Project’s buildout year.

(2) Future Base Transportation System Improvements

(a) Future Roadway Improvements

Any roadway improvement that would result in changes to the physical configuration at the study intersections would be incorporated into the analysis. However, these improvements depend on the construction of the development projects, which are not

guaranteed to be built or may not be completed by Project buildout. Therefore, this analysis conservatively concluded that these improvements would not be implemented by the year 2025. Other proposed traffic/trip reduction strategies were also not applied to the analysis.

(b) Mobility Plan 2035

As previously discussed, the Mobility Plan identifies key corridors of mobility-enhanced networks. Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. Specific improvements in such networks have not yet been identified, and no schedule for implementation has been made available. As such, there have been no changes to vehicular lane configurations as a result of the Mobility Plan. However, the following mobility-enhanced networks included corridors within the immediate vicinity of the Project Site:

- **Transit-Enhanced Network (TEN):** The TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. No streets within the Study Area are designated as part of the network.
- **Neighborhood Enhanced Network (NEN):** The NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. The NEN has designated Selma Avenue as part of the network.
- **Bicycle Enhanced Network/Bicycle Lane Network (BEN/BLN):** The BLN has designated Sunset Boulevard as part of the network.
- **Pedestrian Enhanced District (PED):** The Mobility Plan aims to promote walking to reduce the reliance on automobile travel by providing more attractive and pedestrian-friendly sidewalks, as well as adding pedestrian signalizations, street trees, and pedestrian-oriented-design features. The PED has designated Sunset Boulevard as part of the Pedestrian Segments, where pedestrian improvements could be prioritized to provide better connectivity to and from major destinations within communities.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadways, 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

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

As discussed above, with implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As such, this analysis will not go into detail on the anticipated effect of the Project with respect to LOS. Instead, the focus of the analysis of transportation impacts is on VMT in order to reduce GHG, create multimodal networks, and promote mixed-use developments. The LADOT 2020 TAG defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. Per the TAG, the CEQA transportation analysis identifies significant impacts by analyzing whether the Project would: be consistent with plans, programs, ordinances, and policies; cause substantial VMT; or substantially increase hazards. Each of these thresholds are described below.

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

As described above, Appendix G Transportation Threshold (a) has been updated to require an analysis of the proposed Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. In accordance with the LADOT 2020 TAG, a project that generally conforms with, and does not obstruct, the implementation of the policies and standards, or preclude future improvements, 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.⁹ 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.

As stated above, consistent with State CEQA guidance, the TAG identifies significance thresholds when evaluating potential VMT impacts. 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 exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. Similarly, an office or retail project would result in a significant VMT impact if it would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC area in which it is located. The Project does not fit the TAG's definition of a regional-serving retail project, and therefore need not conduct additional VMT analysis of retail uses beyond what is provided by the VMT Calculator, which is discussed below.

Residents contribute to household VMT while employees (including hotel, office, retail, and restaurant employees) contribute to work VMT. The TAG identifies a daily

⁹ OPR, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

household VMT per capita impact criteria of 6.0 and a daily work VMT per employee impact criteria of 7.6 for the Central APC, in which the Project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 6.0 and the Project's average work VMT per employee be equal to or lower than 7.6, the Project's overall VMT impact would be less than significant.

These thresholds, and the VMT analysis to which they apply, are based on specific types of one-way trips, including Home-Based Work Production (trips to a workplace destination originating from a residential use at the Project Site); Home-Based Other Production (trips to a non-workplace destination originating from a residential use at the Project Site); and Home-Based Work Attraction (trips to a workplace destination originating from a residential use). The location and characteristics of residences and workplaces are often the main drivers of VMT. As outlined in the Transportation Assessment included in Appendix I of this Draft EIR, the City's household VMT per capita threshold applies to Home-Based Work Production trips and Home-Based Other Production trips, and the work VMT per employee threshold applies to Home-Based Work Attraction trips. Other types of trip generation by the Project are not factored into the VMT per capita and VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, those trips are factored into the calculation of total Project trip generation and VMT for LADOT screening purposes.

As discussed further in the analysis of cumulative impacts below, 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

As discussed above, 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) 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, travel demand forecasting, population and employment assumptions, and TDM measures.

(i) Travel Behavior Zone

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through 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.
3. Compact Infill (Zone 3): Higher-density neighborhoods that include multi-story buildings and well-connected streets.
4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network.

The VMT Calculator determines a project's TBZ based on the latitude and longitude of the project address. The Project is located in an Urban (Zone 4) TBZ.

(ii) Mixed-Use Development Methodology

As detailed in the City of Los Angeles VMT Calculator Documentation, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following sociodemographic, land use, and built environment factors for 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 circuitry 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) and also affects the number of people when calculating the daily VMT per capita.

(iii) Travel Demand Forecasting

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 within 0.125 mile of a project to determine the trip length and trip type, both of which factor into the calculation of a project's VMT.¹⁰

(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 Manual, 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

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 VMT Calculator includes seven categories of TDM strategies, including: (1) Parking;

¹⁰ Los Angeles Department of Transportation and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*.

¹¹ *The 2018 LAUSD Developer Fee Justification Study and the ITE Trip Generation Manual, 10th Edition are now available, but City's VMT Calculator utilized the editions indicated herein.*

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

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

(3) Hazardous 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.

In addition, pursuant to LADOT's City Freeway Guidance, issued in May 2020, a freeway safety analysis is required for land use proposals that are required to prepare a Transportation Assessment. As outlined in the Transportation Assessment, the City Freeway Guidance provides a methodology for assessing whether additional vehicle queuing at off-ramps could result in safety impacts due to speed differentials between mainline freeway lanes and the queued vehicles at the off-ramp.

(4) 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 features:

TR-PDF-1: Pursuant to City of Los Angeles requirements, the Project shall incorporate the following TDM strategies:

- **Bicycle Parking:** In accordance with LAMC requirements, the Project will provide on-site long-term and short-term bicycle parking

facilities to encourage the use of bicycling as an alternative to driving.

- **Reduced Parking Supply:** The Project Site shall apply parking reduction rates from standard LAMC requirements pursuant to the TOC Guidelines.

TR-PDF-2: Prior to the start of construction, 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 LADOT, should 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;
- Temporary traffic controls during construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons);
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall 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;
- Coordinate with LADOT Parking Meter Division to address loss of metered parking spaces;
- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, as appropriate, including along all identified Los Angeles Unified School District (LAUSD) pedestrian routes to nearby schools;
- Schedule construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours, to the extent feasible, so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools;
- Notify the LAUSD Transportation Branch and the site administrators of nearby LAUSD schools of the expected start and ending dates of construction. In addition, the contractor or their

designee shall coordinate with LAUSD site administrators and/or designated representatives to ensure that effective measures are employed to reduce construction-related effects related to existing pedestrian and school bus routes, and school drop off/pick up areas on proximate LAUSD facilities; and

- Identification of a construction manager and provision of a telephone number posted at the site during site preparation, grading, and construction readily visible to any interested party for any inquiries or complaints regarding construction activities.

d. Analysis of Project Impacts

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

(1) Impact Analysis

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 summarized below, along with the Project's conformance. In addition to the documents listed in the TAG, the Project's consistency with the relevant plans and policies outlined above in the Section 2.a, Regulatory Framework, was also reviewed.¹²

(a) Americans with Disabilities Act

Overall, the Project design would comply with all ADA requirements, including the Standards for Accessible Design included in Appendix A through Part 36 of the ADA. As outlined in the Transportation Assessment included in Appendix I of this Draft EIR, adjacent to the Project Site, 10-foot-wide sidewalks are provided along Selma Avenue, and 12-foot-wide sidewalks are provided along Ivar Avenue. Additionally, there are tactile warning strips for ADA accessibility, pedestrian push buttons, and standard crosswalks at the intersection of Ivar Avenue and Selma Avenue. All sidewalks and curb ramps along the Project frontage would be designed in compliance with ADA standards to achieve accessibility for all patrons of the Project. In addition, the Project would provide direct connections to pedestrian amenities at adjacent intersections.

¹² *The Project's consistency with AB 32 and SB 375 is analyzed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.*

(b) Complete Streets Act

The Complete Streets Act requires local jurisdictions to consider the needs of all roadway users during general plan updates and to adequately accommodate the needs of bicyclist, pedestrians, and transit riders, in addition to motorists. While this legislation relates to city and county actions, the Project would support the Complete Streets Act by locating residential and commercial uses in a highly urbanized area that is within an HQTAs and a TPA that is well-served by public transit, thereby addressing the needs of transit riders. In addition, the Project would enhance the pedestrian experience through the inclusion of pedestrian amenities, accessible sidewalks, and well-designed vehicular access driveways. The Project would include various streetscape improvements as well as ground floor commercial uses and a residential lobby area that would activate the streetscape and accommodate and encourage pedestrian activity. The Project would also include approximately 166 bicycle parking spaces, which would address the needs of bicyclists. Furthermore, the Project would remove the Selma Avenue driveway, which is a designated bicycle route, and would provide new driveways on Ivar Avenue, which would not cross any existing bicycle facilities. In addition, the Project would not include any new or unusual obstacles that would be considered hazardous to pedestrians or bicyclists. Thus, the Project would support the Complete Streets Act.

(c) 2020–2045 RTP/SCS

Objective 6 of the 2020–2045 RTP/SCS calls for a circulation system that is coordinated with land uses and densities and adequate to accommodate traffic, and for the expansion and improvement of public transportation service. The Project Site is located in a highly urbanized area and designated HQTAs and TPAs that is well-served by public transit provided by Metro and LADOT. The Project would include various streetscape improvements and street-level commercial uses that would activate the surrounding pedestrian environment and enhance walkability. Furthermore, the Project would provide approximately 166 short- and long-term bicycle parking spaces, per LAMC requirements. Thus, the Project would coordinate land use and circulation by promoting opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.

(d) 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:** Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.

2. **World Class Infrastructure;** A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. **Access for All Angelenos:** A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
4. **Collaboration, Communication, and Informed Choices:** The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. **Clean Environments and Healthy Communities:** Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Mobility Plan 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 Assessment included in Appendix I of this Draft EIR, along with a detailed discussion of the Project's consistency with each. A summary of the analysis from the Transportation Assessment is provided below.

The Mobility Plan designates streets and sidewalk width standards based on a street's functional classification. In accordance with these standards and LAMC Section 12.37, the Project would provide a 2-foot dedication along Cahuenga Boulevard (along the entire western boundary of the Project Site), and a 10-foot by 10-foot corner cut dedication at Ivar Avenue and Selma Avenue to meet City standards. The Project would maintain the designated driveway and roadway width requirements to meet the goals and serve the long-term needs of the Mobility Plan. Consistent with the driveway location guidelines, vehicular access to the Project's two above-grade and four subterranean parking levels would be provided via two proposed driveways along Ivar Avenue, which is a non-arterial street. These driveways would be designed in accordance with the standards set forth in LADOT's Manual of Policies and Procedures (2008) to provide sufficient internal queuing space and to ensure safety for pedestrians. While Selma Avenue is part of the Neighborhood Enhanced Network, the Project would not be in conflict with or preclude implementation of any neighborhood improvements that may be identified for the street. Rather, the Project would remove vehicle access from Selma Avenue, which has been designated in both the HIN and NEN and relocate it to Ivar Avenue, which does not have those network classifications.

The Project would support non-motorized transportation options through the provision of secure and convenient parking for at least 166 bicycles (19 short-term and

147 long-term bicycle parking spaces) and by developing a mixed-use project located within a 0.25-mile walking distance of the Metro B Line Hollywood/Vine Station and nearby local bus stops. Close proximity to fixed-rail and other transit services supports “first-mile/last-mile” solutions. In addition, separate pedestrian access to the Project Site would be provided via residential lobby and commercial entrances along Ivar Avenue and Selma Avenue with activate ground-floor street frontages to create a high-quality pedestrian experience. All sidewalks and curb ramps along the Project frontage would be designed in compliance with ADA standards. In addition, the Project includes a mix of land uses that would encourage interaction between components within a walkable environment in close proximity to jobs, destinations, and neighborhood services that are available in the immediate area, thereby reducing the number of trips made by vehicles and reducing overall VMT.

The Project’s TDM elements outlined in Project Design Feature TR-PDF-1 would further reduce the Project’s dependency on single-occupancy vehicles by applying allowable parking reduction rates from standard LAMC requirements pursuant to the TOC Guidelines and providing convenient bicycle parking in conformance with LAMC requirements. TDM measures help reduce vehicle trips and VMT from the Project Site consistent with City and State transportation and GHG policies and objectives. The Project would also provide sufficient off-street parking to accommodate Project parking demand.

As detailed in Table C-1 of the Transportation Assessment 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 Mobility Plan.

(e) 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 C-2 in the Transportation Assessment included in Appendix I 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. The Project prioritizes safety and access for all individuals utilizing the site by complying with ADA requirements and providing direct connections to pedestrian amenities at the adjacent and nearby signalized intersections along Ivar Avenue at Selma Avenue and Sunset Boulevard. Further, the Project would support healthy lifestyles by locating housing near transit, providing bicycle amenities, and enhancing the pedestrian

environment. In addition, the inclusion of affordable housing units would provide attainable opportunities for social mobility and would not displace existing housing. The Project would also incorporate TDM measures, as outlined in Project Design Feature TR-PDF-1 that would reduce the number of single-occupancy vehicle trips to the Project Site, thereby lowering VMT and reducing GHG. Thus, based on the above and as detailed in Table C-2 in Appendix C of the Transportation Assessment included in Appendix I of this Draft EIR, the Project is consistent with the policies included in the Plan for a Healthy Los Angeles.

(f) Hollywood Community Plan

The Hollywood Community Plan identifies one transportation-related objective (Objective 6), which calls for the provision of a circulation system coordinated with land uses and densities and adequate to accommodate traffic and to encourage the expansion and improvement of public transportation service. The Community Plan also includes a circulation policy section and a circulation public improvement program. The policy section provides a discussion regarding public provision of an improved public transportation system and/or additional highways and freeways. The Hollywood Community Plan also identifies transportation-related policies and programs to achieve Objective 6. As detailed in the Transportation Assessment, the Project would not conflict with applicable policies or programs of the Hollywood Community Plan. The Project would provide both market-rate and affordable residential units to further the development of Hollywood as a major center of population and satisfy the varying needs and desires of all economic segments of the community, maximizing the opportunity for individual choice. Furthermore, the Project Site is located in a highly urbanized area and designated HQTAs and TPAs that is well-served by public transit provided by Metro and LADOT. The Project would include various streetscape improvements as well as ground floor commercial uses and a residential lobby area that would activate the streetscape and encourage pedestrian activity. Furthermore, the Project would implement TDM strategies, as outlined in Project Design Feature TR-PDF-1, including the provision of bicycle amenities to encourage the use of bicycling as an alternative to driving and the application of parking reduction rates per TOC Guidelines, that would further reduce the number of single-occupancy vehicle trips generated by the Project. Thus, the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling for residents, employees, and visitors of the Project. Thus, based on the above and as outlined in Table C-5 in Appendix C of the Transportation Assessment included in Appendix I of this Draft EIR, the Project would not conflict with applicable policies of the Hollywood Community Plan addressing the circulation system.

(g) Hollywood Redevelopment Plan

The Hollywood Redevelopment Plan was intended to direct the City on matters pertaining to the redevelopment, rehabilitation, and revitalization of the Hollywood Redevelopment Plan area. The Hollywood Redevelopment Plan includes a transportation-

related goal (Goal 12) to: support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking, and mass transit systems with an emphasis on serving existing facilities and meeting future needs. As previously described, the Project would support the use of public transportation and a reduction in vehicle miles traveled by concentrating new development in a designated HQTAs and TPAs. Specifically, Metro and LADOT would provide a variety of transit options to Project residents, employees, and visitors, including bus lines and the Metro B Line Hollywood/Vine Station located approximately 1,000 feet from the Project Site. The Project would also provide a total of 166 bicycle parking spaces, including 147 long-term spaces and 19 short-term spaces that would promote the use of alternative transportation. In addition, as the Project is not located along a corridor that has been identified as a circulation corridor in the Redevelopment Plan, the Project would not preclude City improvements to circulation and traffic flow. Thus, based on the analysis above and as outlined in Table C-5 in Appendix C of the Transportation Assessment included in Appendix I of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the Hollywood Redevelopment Plan.

(h) LAMC

LAMC Section 12.21 A.4 details the City's off-street automobile parking requirements for new developments. As noted in the Transportation Assessment, when the LAMC standard parking rates are applied to the Project, a total of 629 parking spaces would be required before accounting for applicable reductions. Per LAMC Section 12.22 A.31 and the TOC Guidelines, the Project qualifies as a TOC Tier 3 Housing Development and thus, may reduce both its residential and non-residential parking space requirements from these LAMC standards. Thus, after applying the maximum permitted reductions, a total of 193 vehicle parking spaces could be required. The Project would provide up to 320 vehicle parking spaces within three subterranean and two above-grade levels and would, thus, meet the LAMC and TOC Guidelines requirements. Furthermore, pursuant to SB 743 and City of Los Angeles ZI File No. 2452, the Project's parking impacts, if any, are not considered significant impacts under CEQA. Notwithstanding, the Project's proposed parking supply would meet applicable LAMC requirements and would not result in a significant parking impact in any case.

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. The Project's bicycle parking requirement is 164 spaces (146 long-term and 18 short-term). The Project would provide 166 bicycle parking spaces for residential and commercial users (including 147 long-term and 19 short-term spaces) to satisfy the LAMC requirements for on-site bicycle parking supply.

LAMC Section 12.26 J, the TDM Ordinance (Ordinance No. 168,700, effective March 31, 1993) establishes TDM requirements for non-residential projects, in addition to

non-residential components of mixed-use projects in excess of 25,000 square feet. The Project proposes up to 6,790 square feet of new commercial uses and would not exceed 25,000 square feet.¹³ Therefore, LAMC Section 12.26 J would not apply to the Project and the Project would not conflict with the requirements of LAMC Section 12.26 J. Nonetheless, as outlined above, pursuant to Project Design Feature TR-PDF-1, the Project proposes to implement TDM measures, including the provision of bicycle parking per LAMC requirements and the application of allowable parking reduction rates from standard LAMC requirements pursuant to the TOC Guidelines.

(i) Vision Zero

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025. Vision Zero identified Selma Avenue and Sunset 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.

As part of Vision Zero's Sunset Boulevard Safety Improvements, LADOT installed basic safety improvements, including continental crosswalks, along Sunset Boulevard between L. Ron Hubbard Way and Selma Avenue as of June 2019. No further improvements are planned near the Project Site. Nonetheless, the Project improvements to the pedestrian environment would not preclude future Vision Zero Safety Improvements by the City and it would remove one vehicular driveway along Selma Avenue, thereby reducing potential conflicts with pedestrians on an HIN corridor. Thus, the Project does not conflict with Vision Zero.

(j) Interim Guidance for Freeway Safety

Based on the Project's trip generation estimates and trip assignments, which are detailed in Chapter 4 of the Transportation Assessment, the Project would not add 25 or more peak hour trips to any freeway off-ramp. Therefore, no further freeway off-ramp queuing analysis is required. Furthermore, the Project would not result in a significant safety impact, and no corrective measures at any freeway off-ramps would be required.

¹³ Note that the Transportation Assessment assessed a slightly larger commercial tenant space of 6,805 square feet for the Project, resulting in a more conservative calculation of the Project trips and VMT associated with this space.

(k) 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. As previously discussed, the Design Guidelines are organized around three design approaches: Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Per the TAG, the Pedestrian-First Design policies are applicable to this analysis. In summary, the Project prioritizes and enhances the pedestrian experience through its design via the inclusion of pedestrian amenities, accessible sidewalks, and well-designed vehicular access driveways. Specifically, the Project would activate the ground floor along the primary street frontage by introducing new commercial and residential lobby uses that would be designed to be highly visually permeable with a coherent, uniform architectural design. In addition, the corner of the building at Selma and Ivar Avenue would be set back to provide increased visibility as well as a street-level gathering area. Both the commercial entry and residential main lobby entry would include landscaped areas to enhance and distinguish these entries. The Project would also include pedestrian-scale lighting and visibility at the ground floor which would improve the livability of the neighborhood. The Project would incorporate new landscaping along the Project Site perimeter and would include street trees for shade, which would further activate the streetscape and improve the pedestrian environment. In addition, the proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Thus, based on the above and as outlined in Table C-5 in Appendix C of the Transportation Assessment included in Appendix I of this Draft EIR, the Project is consistent with all applicable policies of the Design Guidelines.

(l) Conclusion

As summarized above and detailed in Appendix C of the Transportation Assessment included in Appendix I 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, and impacts would be less than significant.

(2) Mitigation Measures

Project-level impacts with respect to conflicts with programs, plans, ordinances, or policies addressing the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts with respect to conflicts with programs, plans, ordinances, or policies addressing the circulation system were determined to be less than significant without mitigation. No mitigation measures were required or included, and the impact level would remain 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. To provide a comprehensive analysis, the VMT Calculator utilized the entire Property Site's existing and proposed land uses and their respective sizes in consideration of both existing VMT generated by the occupied commercial uses (minus 4,000 square feet within the existing commercial space that has been vacant since prior to 2018) and new VMT generated by the Project and the anticipated occupancy of the approximately 4,000 square feet of currently vacant commercial uses. The land use inputs included 243 multi-family housing units, 27 affordable housing units, 29,828 square feet of retail uses, and 10,805 square feet of high-turnover restaurant uses. Based on the Project's land uses and location, assumptions were identified in the VMT Calculator, which are outlined in Table 4 of Transportation Assessment. Per the *VMT Calculator User Guide* (May 2020), work VMT per employee is not reported for projects with local-serving commercial uses (i.e., commercial uses less than 50,000 square feet), and is thus, considered to be less than significant. As such, the Project's proposed new commercial space of up to 6,805 square feet, conservatively combined with the 33,828 square feet of existing and vacant commercial space, would not result in a significant work VMT impact. Additionally, pursuant to Project Design Feature TR-PDF-1, the Project would incorporate TDM strategies to reduce the number of single-occupancy vehicle trips to the Project Site, including the application of parking reduction rates and standard LAMC requirements pursuant to the TOC Guidelines and the provision of bicycle parking on-site per LAMC requirements. However, for purpose of providing a conservative analysis, these Project Design Features were not taken into consideration in the VMT analysis.

Using these assumptions, the Project is estimated to result in 2,479 daily vehicle trips and a total daily VMT of 15,916, resulting in a daily household VMT per capita of 3.9, which is below the Central APC impact threshold of 6.0. Therefore, the Project would not result in a significant VMT impact and no mitigation measures would be required. Since the ground floor commercial space component of the Project is less than 50,000 square feet, it is considered to be a small-scale and local-serving retail use under the TAG screening criteria. The commercial space is intended to serve primarily Project residents

and visitors. Accordingly, per the TAG, VMT impacts from this portion of the Project would be less than significant.¹⁴ **Thus, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) and impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to conflict with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to conflict with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant without mitigation. No mitigation measures were required or included, and the impact level would remain less than significant.

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

(1) Impact Analysis

As discussed above, the 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.

(a) Access Overview

Vehicular access to the Project Site is currently provided via a two-way driveway on Selma Avenue. The Project would remove vehicle access from Selma Avenue, which has been designated in both the HIN and NEN, and replace it on Ivar Avenue, which does not have those network classifications, consistent with the MPP. Vehicular access to the Project Site would be provided via the following two driveways along Ivar Avenue:

¹⁴ LADOT, *Transportation Assessment Guidelines*, July 2020, p. 19.

- Primary driveway: Located on Ivar Avenue approximately 175 feet south of Selma Avenue. This driveway would accommodate left-turn and right-turn ingress and egress movements and provide access to the loading dock, ground-level parking, and four levels of subterranean parking.
- Secondary driveway: Located on Ivar Avenue approximately 35 feet south of the primary driveway. This driveway would be limited to right-turn ingress and egress movements only and provide access to one level of above-grade parking.

(b) Potential Geometric Design Hazards

The Project Site vicinity consists of generally level topography and improved streets. There are no existing curves or grades on Ivar Avenue or Selma Avenue adjacent to the Project Site that would result in sight distance obstacles causing vehicle, bicycle, or pedestrian conflicts. In addition, no transit facilities are located adjacent to the Project Site. The Project's proposed driveways would be designed and placed to provide adequate sight distance and no new or unusual obstacles are presented in the design that would reduce sight distance or be considered hazardous to vehicles, bicycles, or pedestrians. The design and location of the driveways are not anticipated to result in vehicular-bicycle conflicts, as Ivar Avenue is not part of a bicycle network. Furthermore, the intersections located at either end of the block from the proposed Project driveways (i.e., Ivar Avenue/Selma Avenue and Ivar Avenue/Sunset Boulevard) are controlled with traffic signals that facilitate traffic flow to and from Ivar Avenue and reduce conflicts and confusion between vehicular traffic and pedestrians with marked crosswalks, walk signal indicators, and countdown timers.

In addition, as outlined in the Transportation Assessment, the proposed driveways would have the capacity to accommodate all trips generated by the Project and trips associated with the existing commercial uses would utilize the proposed driveways. As such, vehicles entering and exiting the driveways would not substantially affect operating conditions along Ivar Avenue and no hazards are expected to occur related to operation of the driveways.

Project driveways would be designed to comply with LADOT standards and would be subject to review by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable safety requirements are met. In addition, the proposed uses would be consistent with the surrounding uses (i.e., residential and commercial) and would not introduce hazards due to incompatible uses. Thus, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses.

(c) Consistency with Modal Priority Networks

Ivar Avenue is a designated Local Street with existing half-width right-of-way (ROW) width of 34 feet, which meets the City's minimum standard of 30 feet. Selma Avenue, which is also a designated Local Street and is part of the Mobility Plan's NEN and Vision Zero's HIN, has an existing half-width ROW width of 30 feet, which also meets the City's minimum standards. As such, the Project is not required to provide additional dedication or widening along Ivar Avenue or Selma Avenue. The Project would also provide a 2-foot dedication along Cahuenga Boulevard, along the western boundary of the Project, to meet City standards of 40 feet. Additionally, the Project would include a 10-foot by 10-foot corner cut dedication at Ivar Avenue and Selma Avenue, consistent with City standards.

(d) Pedestrian and Bicycle Activity

The Project would result in an increase in both pedestrian and bicycle activity on Ivar Avenue and Selma Avenue, though not in sufficient quantities to result in a significant conflict with vehicles using the driveways. Furthermore, the Project would provide separate, dedicated pedestrian access points via the residential lobby and commercial entrances along Ivar Avenue and Selma Avenue (as well as the existing commercial entrances along Cahuenga Boulevard), which would further reduce conflicts with vehicles.

Currently, bicycle routes are provided along Selma Avenue adjacent to the Project Site. No transit facility is located adjacent to the Project Site and no streets adjacent to the Project Site have been identified as part of the Mobility Plans BEN, BLN, or TEN. The Project would remove the Selma Avenue driveway, and the proposed driveways on Ivar Avenue would not cross any existing bicycle facilities. The Project would not preclude or interfere with the implementation of any other future roadway improvements benefitting transit, pedestrians, or bicycles. In addition, the Project would not include any new or unusual obstacles that would be considered hazardous to pedestrians or bicyclists. While construction activities would be primarily contained within the Project Site boundary, construction fences may encroach into the public right-of-way adjacent to the Project Site. Similarly, while vehicular travel lanes would be maintained in both directions along the surrounding streets during Project construction, bicycle traffic along the bicycle route on Selma Avenue may be temporarily modified. The Construction Traffic Management Plan included as Project Design Feature TR-PDF-2 would include measures to ensure pedestrian and bicycle safety along the affected sidewalks and bicycle facilities through the use of measures such as alternative routing, protection barriers, and directional signage.¹⁵

¹⁵ *In addition to the Construction Traffic Management Plan, the Local Stormwater Pollution Prevention Plan (SWPPP) that will be prepared for the Project will include Best Management Practices (BMPs), including the designation of on-site staging areas for construction materials and equipment.*

(e) Safe Routes to School

The Project is not located within 0.25 mile of a school. However, Selma Avenue Elementary School is located approximately 0.3 mile west of the Project Site. As part of the Selma Avenue Elementary Safe Route to School Plan, curb extensions were installed along portions of Selma Avenue. The Project would not directly affect access to Selma Avenue Elementary School but would add vehicular traffic to the area. However, the Project would also remove vehicle access to the Project Site from Selma Avenue, and replace it on Ivar Avenue. The driveway would be designed in accordance with the MPP and the sidewalks adjacent to the Project Site frontage would meet or exceed Mobility Plan standard widths. Therefore, the Project would not result in a significant safety hazard to students. Furthermore, as part of the Project's Construction Traffic Management Plan to be implemented as TR-PDF-2, the applicant would consult with LAUSD site administrators regarding Project construction coordination and preservation of Safe Routes to School during construction activities.

(f) Freeway Safety

As discussed above in Regulatory Framework, in May 2020, LADOT issued the City Freeway Guidance for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.

The City Freeway Guidance requires analysis of freeway off-ramps where a proposed development project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queueing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As identified in the Transportation Assessment, based on the Project's trip generation estimates and trip assignments, the Project would not add 25 or more peak hour trips to any freeway off-ramp. Therefore, no further freeway queuing analysis is required, and the Project would not result in a significant freeway safety impact.

(g) Conclusion

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-related impacts related to hazardous geometric design features would be less than significant without mitigation. No mitigation measures were required or included, and the impact level would remain less than significant.

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

(1) Impact Analysis

(a) Construction

As evaluated in the Initial Study for the Project, included in Appendix A of this Draft EIR, while it is expected that the majority of construction activities for the Project would primarily be confined to the Project Site, limited off-site construction activities, such as traffic control and flagging or construction fencing, may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, travel lanes would be maintained in both directions along the adjacent streets. Pursuant to Project Design Feature TR-PDF-2, as part of the requirements of the Construction Traffic Management Plan, flag persons would be present to maintain two-way traffic operations along Ivar Avenue should any travel lane be closed during this period. Additional temporary traffic controls would be provided to direct traffic around any closures and to maintain emergency access as required by the Construction Traffic Management Plan. Any anticipated lane closure would be coordinated with LADOT.

In addition, 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; however, with implementation of the Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-2, emergency access would not be impeded. The Project's Construction Traffic Management Plan would 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 comply with LAFD access requirements and applicable LAFD regulations regarding safety. As such, construction-related impacts associated with emergency access would be less than significant.

(b) Operation

With regard to Project operation, the Project does not propose the permanent closure of any local public streets and would not impede emergency vehicle access to the Project Site or the surrounding area. In addition, the Project would comply with 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 Hollywood Area Commanding Officer that includes access routes and any additional information that might facilitate police response, as provided in Project Design Feature POL-PDF-6. Furthermore, pursuant to California Vehicle Code (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 related to adequate emergency access during construction and operation of the Project would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with respect to emergency access were determined to be less than significant without mitigation. No mitigation measures were required or included, and the impact level would remain less than significant.

e. Cumulative Impacts

(1) Impact Analysis

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

As discussed in Section III, Environmental Setting, of this Draft EIR, a total of 46 related development projects have been identified in the vicinity of the Project Site for inclusion in the cumulative impact analysis. The related projects comprise a variety of uses, including apartments, condominiums, restaurants, hotels, office, and retail uses, as well as mixed-use development that incorporate some or all of these elements.

Similar to the Project, the related project would be individually responsible for complying with relevant plan, programs, ordinances, and policies addressing the circulation system. Thus, overall, implementation of the Project, together with the related projects, would not create inconsistencies with the Mobility Plan, Hollywood Community Plan, Hollywood Redevelopment Plan, and the Plan for a Healthy Los Angeles. The related projects primarily propose high-density residential uses in an area with good transit connectivity, reducing dependence on automobiles and encouraging more active travel modes. In addition, similar to the Project, it is anticipated that none of the related projects would preclude future Vision Zero Safety Improvements by the City. As with the Project, each of the related projects would be individually responsible for providing on-site parking based on LAMC requirements or any applicable specific plan and for providing on-site bicycle parking based on LAMC requirements, and for implementing any required measures under the TDM Ordinance. Similar to the Project, the related projects would also be expected to comply with the Citywide Design Guidelines by providing street-level amenities in support of an active, walkable neighborhood environment.

Based on the above, Project impacts with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) Vehicle Miles Traveled

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 evaluated above, the Project would result in a less than significant VMT impact.

Additionally, the Project consists of a mix of uses in an infill location with convenient access to public transit and opportunities for walking and biking, which would result in a reduction of vehicle trips, VMT, and GHG emissions. The Project has been designed to further reduce single-occupancy trips to the Project Site through TDM measures, as outlined in Project Design Feature TR-PDF-1. In addition, consistent with RTP/SCS goals, the Project supports the focus of growth near destination and mobility options by developing housing near local and regional transit (e.g., the Metro B Line Hollywood/Vine Station), promoting diverse housing choices by providing affordable housing units, and encouraging active transportation through the provision of new bicycle parking and active street frontages. The Project encourages a variety of transportation options and is consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region and, therefore, would not result in a cumulatively significant VMT impact.

Moreover, as detailed in the TAG, projects that do not demonstrate an impact by applying an efficiency-based impact threshold (i.e., household VMT per capita, work VMT per employee) would not result in a cumulatively significant VMT impact. A less than significant impact conclusion using the City's criteria is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG reduction goals of the RTP/SCS. Therefore, as the Project would not result in a significant household VMT impact, it also would not result in a cumulatively significant VMT impact. Furthermore, as described above, the Project's commercial floor area is less than 50,000 square feet and therefore considered to be a small-scale and local-serving commercial use under the TAG screening criteria, and per the TAG, VMT impacts from this portion of the Project would therefore be less than significant. **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. Related Project No. 2 (Ivar Garden Hotel) is proposed to be located south of the Project Site. Although the final design of Related Project No. 2 is unknown, the primary access for the related project is proposed to be located along Cahuenga Boulevard, with secondary access along Ivar Avenue. The approximate distance between the Project Site and Related Project No. 2 and the proposed driveway locations, as well as the existing geometry of Ivar Avenue, would provide adequate spacing to avoid vehicle turn conflicts and would not impose additional safety issues.

Similar to the Project, all of the related projects, including Related Project No. 2, would be individually responsible for complying with the City's design standards and the

guidelines outlined in Threshold T-3 of the TAG to address potential safety conflicts. Therefore, the Project, together with the related projects, would not result in a significant cumulative impact associated with hazardous geometric design features. **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 related to transportation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

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