IV. Environmental Impact Analysis
H. Transportation

1. Introduction

This section analyzes the Project's potential impacts on transportation. The analysis is primarily based on the *Sunset + Wilcox Project Transportation Assessment* (Transportation Assessment) prepared for the Project by Fehr and Peers, dated March 2021 and included in Appendix J of this Draft EIR.

The Transportation Assessment was prepared pursuant to the Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines (TAG)* dated 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. The updated CEQA Guidelines require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment was approved by LADOT on December 6, 2021. A copy of LADOT's Assessment Letter for the Transportation Assessment is included as Appendix J.1 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
- Congestion Management Program
- Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035
- Hollywood Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles

(1) Federal

(a) Americans with Disabilities Act (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 and Senate Bill 375

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

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

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

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

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

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS.

Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential; (2) meet density requirements; and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

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

(c) California Vehicle Code

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

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which was released on August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the

most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

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

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop[1] or a stop along an existing high-quality transit corridor[2] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

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[1] *"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.*

[2] *"High-quality transit corridors" are defined in PRC Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.*

(3) Regional

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

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

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

limited to, a 5-percent reduction in VMT per capita, a 9-percent reduction in vehicle hours traveled, and a 2-percent increase in work-related transit trips.

(4) Local

(a) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendment to the Mobility Plan since its initial adoption, including the latest amendment on September 7, 2016.[3] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

(1) Safety First;

(2) World Class Infrastructure;

(3) Access for All Angelenos;

(4) Collaboration, Communication, and Informed Choices; and

(5) Clean Environments and Healthy Communities.

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

Street classifications are designated in the Mobility Plan, and may be amended by a Community Plan. The street classifications contained in the Mobility Plan are intended to create a better 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:

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

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

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

- Collector Streets—Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.

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

  - Continuous local streets that connect to other streets at both ends, and/or

  - Non-Continuous local streets that lead to a dead-end.

The Mobility Plan 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 PED 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 Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses, as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Hollywood Community Plan area.[4] While the current Hollywood Community Plan does not include transportation-related objectives, policies, and programs, it identifies the need to maximize the development opportunities of the rail transit system (i.e., Metro B (Red) Line).

(c) Hollywood Redevelopment Plan

The Project Site is located within the Hollywood Redevelopment Plan area. The Hollywood Redevelopment Plan sets forth the re-planning, redesign and rehabilitation and/or development of areas within the Hollywood Redevelopment Plan area that are stagnant or improperly utilized and could not be accomplished by private enterprise acting alone, without public participation and assistance. Transportation-related guidelines, including circulation, parking, and loading facilities, are described in Section 518 of 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

[4] *The Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update (https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update).*

permit shall be issued therefore, on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

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

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

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

improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[5]

(f) LADOT Manual of Policies and Procedures Section 321

LADOT Manual of Policies and Procedures (MPP) Section 321 provides the basic criteria for review of driveway designs. As discussed in MPP Section 321, the basic principle of driveway location planning is to minimize potential conflicts between users of 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 (HIN), which has a higher incidence of severe and fatal collisions. The HIN, 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 the City's 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

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

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.[6] The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b. Existing Street Systems

The existing street system in the transportation analysis study area[7] consists of freeways, arterials, collector, and local streets, which provide regional, sub-regional, and local access and circulation in the vicinity of the Project Site. The existing street system and transit network is shown in Figure IV.H-1 on page IV.H-13.

(1) Freeways

Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101), which is located less than one mile from 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 transportation analysis study area, the Hollywood Freeway provides four lanes in each direction. Access is provided via interchanges at Highland Avenue, Cahuenga Boulevard, Vine Street, Gower Street, Hollywood Boulevard, and Sunset Boulevard.

(2) Streets

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

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

[7] *The study area selected for analysis extends to Gower Street to the east, Franklin Avenue to the north, Highland Avenue to the west, and Santa Monica Boulevard to the south and encompasses a 0.5-mile radius from the Project Site.*

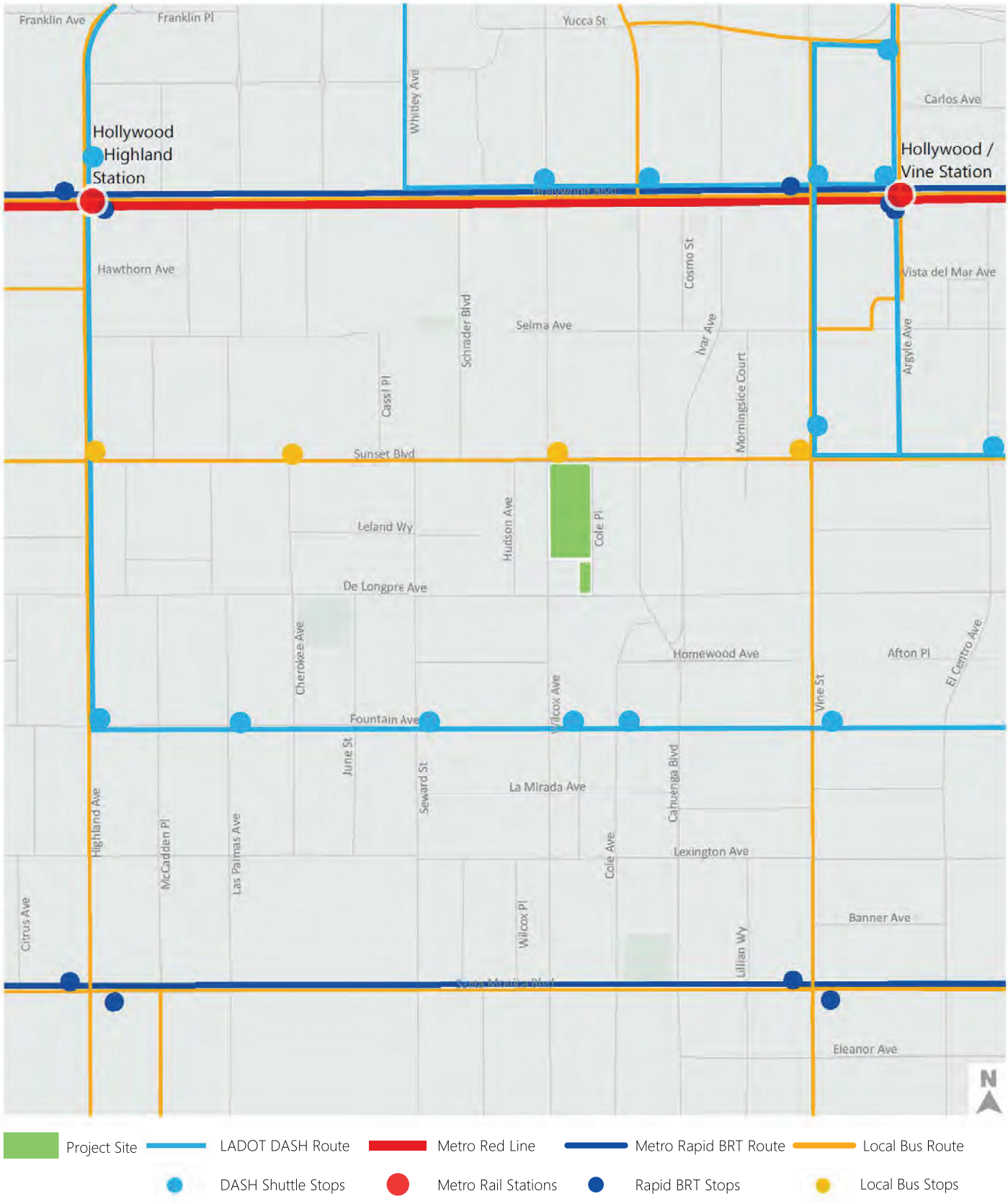

Figure IV.H-1
Existing Street System and Transit Network

Source: Fehr & Peers, 2021.

- Fountain Avenue—Fountain Avenue is designated as a Collector Street that travels in the east-west direction and is located south of the Project Site. It provides one lane in each direction with parking, except during street cleaning periods.

- Sunset Boulevard—Sunset Boulevard is designated as an Avenue I and runs directly north of the Project Site in an east-west direction. It generally provides two through lanes in each direction. Parking is permitted during off-peak periods, however, parking on Sunset Boulevard is restricted during peak periods so that additional lanes may be provided, changing the number of lanes from two to three. Left-turn channelization is provided at most intersections. Sunset Boulevard is included in the PED, the HIN, the Bicycle Lane Network (proposed Tier 3 Bicycle Lane), and the Vehicle Enhanced Network (VEN) in the Mobility Plan 2035.

- De Longpre Avenue—De Longpre Avenue is a local street that runs directly south of the Project Site in the east-west direction. De Longpre Avenue provides one lane in each direction, and parking is permitted on the north side of the street.

- Wilcox Avenue—Wilcox Avenue is designated as a Modified Avenue III and runs directly west of the Project Site in a north-south direction. Wilcox Avenue provides one lane in each direction with parking permitted on both sides of the street. Two-way left-turn lanes are provided along portions of Wilcox Avenue, and left-turn channelization is provided at most intersections. Wilcox Avenue is part of the PED in the Mobility Plan 2035.

- Cole Place—Cole Place is a local street (standard) that runs in the north-south direction directly east of the Project Site. Cole Place provides one lane in each direction with parking permitted on both sides of the street.

- Cahuenga Boulevard—Cahuenga Boulevard is designated as a Modified Avenue II and runs east of the Project Site in the north-south direction. Cahuenga Boulevard provides two lanes in each direction with parking permitted on both sides of the street. The portion of Cahuenga Boulevard north of Hollywood Boulevard is included in the BEN in the Mobility Plan 2035.

- Vine Street—Vine Street is designated as an Avenue II and runs east of the Project Site in the north-south direction. Vine Street provides two lanes in each direction with parking permitted on both sides of the street. Left-turn channelization is provided at most intersections. Vine Street is included in the BEN and PED in the Mobility Plan 2035.

- Gower Street—Gower Street is designated as a Modified Avenue III and runs in the north-south direction. Gower street provides between one and two lanes in the northbound direction and one lane of travel in the southbound direction. Parking is permitted on both sides of the street. Left-turn channelization is

provided at most intersections. Gower Street is included in the NEN in the Mobility Plan 2035.

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

Two streets adjacent to and in the vicinity of the Project Site—Sunset Boulevard and Vine Street—have been identified by the City as a HIN.

(3) Transit System[8]

The Project Site is located within a TPA, and within a Tier 3 Transit Oriented Communities (TOC) Incentive area. As shown in Figure IV.H-1 on page IV.H-13, the Project Site and vicinity are well served by a variety of public transit options, including local and regional bus lines and heavy rail subway service. In particular, the Project Site is located immediately adjacent to the Metro Line 2/302 on Sunset Boulevard and 0.4 mile from the Metro B (Red) Line Hollywood/Vine Station. The Metro 2 Local Line bus route on Sunset Boulevard contains one stop directly across the street from the Project Site (westbound direction) and includes two bus benches and two trash bins. The eastbound direction local bus route includes an existing bus stop along Sunset Boulevard directly west of the Project Site, across Wilcox Avenue, and includes one bus bench and one additional bus shelter. 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 Site vicinity. For additional information on the transit lines operating in the vicinity of the Project Site, refer to the Transportation Assessment included in Appendix J of this Draft EIR.

- Metro B (Red) Line—The Metro 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 Metro B Line has an average headway of 10 minutes during the weekday A.M. and P.M. peak periods. The Metro B Line Hollywood/Vine station is 0.4 mile from the Project Site.

- Metro Line 2/302—Metro Line 2 provides local service between downtown Los Angeles and the Pacific Palisades neighborhood in Los Angeles. These lines run north of the Project Site along Hollywood Boulevard and Sunset Boulevard. Metro Line 302 follows the same route along Sunset Boulevard as Metro Line 2

[8] *This section describes transit services based on pre-COVID-19 conditions. Metro and LADOT have been making service changes as part of their ongoing and evolving response to COVID-19.*

but with limited stops. Each line has average headways of 10 to 15 minutes during the weekday A.M. and P.M. peak periods.

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

- Metro Line 210—Metro Line 210 provides local service between Hollywood and Redondo Beach. This line runs east of the Project Site along Vine Street. Line 210 has an average headway of 15 minutes during the weekday A.M. and P.M. peak periods.

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

- Metro Line 180/181—Metro Lines 180/181 provides local service between Altadena and Hollywood. This line runs north of the Project Site along Hollywood Boulevard. Headways average 15 minutes during peak periods. Metro Line 180 goes to Altadena, and Metro Line 181 goes to the Sierra Madre Station.

- Metro Line 212/312—Metro Lines 212/312 run from Hawthorne to Hollywood. These lines travel on La Brea Avenue, west of the Project Site and along Hollywood Boulevard, north of the Project Site. Metro Lines 212/312 have a headway of approximately 10 minutes during peak periods. Metro Line 312 is the express line.

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

- Metro Line 237—Metro Line 237 provides local service between Santa Monica Boulevard and Ventura Boulevard. The line runs west of the Project Site along Highland Avenue. Headways average 45 to 70 minutes during peak periods.

- Metro Rapid Line 780—Metro Rapid Line 780 provides express service between Pasadena and the Mid-City neighborhood in Los Angeles. This line runs north of the Project Site along Hollywood Boulevard. Line 780 has average headways of 10 to 15 minutes during the weekday A.M. and P.M. peak periods.

- Metro Rapid 704—Metro Rapid 704 provides express service through Santa Monica and Downtown Los Angeles. The line runs south of the Project Site along Santa Monica Boulevard. Metro Line 704 has a headway of 15 minutes during weekday A.M. and P.M. peak periods.

- Metro Circulator 656—Metro Circulator 656 provides weekday/weekend late night service between Hollywood and Panorama City. The line runs west of the Project Site along Highland Avenue. Metro Circulator 656 has a headway of 60 minutes during evening periods.

- 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 25 to 30 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 an average headway of 30 minutes during the weekday A.M. and P.M. peak periods.

- LADOT DASH Beachwood Canyon—The DASH Beachwood Canyon shuttle provides service from Hollywood to Beachwood Canyon via Vine Street. There is a stop near the Project Site at Sunset Boulevard & Vine Street. The DASH Beachwood Canyon shuttle has an average headway of 25 minutes during the weekday A.M. and P.M. peak periods.

c. Existing Project Site Conditions

The Project Site is currently developed with three buildings and surface parking. The existing buildings on the Project Site comprise approximately 26,261 square feet of floor area consisting of a one-story, 16,932-square-foot commercial building along Sunset Boulevard and Wilcox Street/Cole Place, a one-story, 4,446-square-foot commercial office building along Wilcox Street, and a two-story, 4,883-square-foot commercial office building along Cole Place and De Longpre Avenue. Vehicular access to the parking areas of the Project Site is provided via curb cuts and driveways located on Wilcox Avenue and Cole Place. Pedestrian access to the Project Site is provided via sidewalks located along the perimeter of the Project Site.

d. Existing Pedestrian and Bicycle Facilities

(1) Pedestrian Facilities

Based on the Mobility Plan, Sunset Boulevard and Wilcox Avenue are part of the PED.[9] As discussed in the Transportation Assessment, the study area generally has a mature network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features. Approximately 8- to 18-foot sidewalks are provided throughout the study area.

(2) Bicycle Facilities

Per the Mobility Plan, Sunset Boulevard is a part of the BEN. In the vicinity of the Project Site, Wilcox Avenue, Selma Avenue, Argyle Avenue, and Fountain Avenue are designated as roadways intended to share the road with bicyclists and provide shared lane markings, these roads are also known as bicycle routes. Tier 3 bicycle lanes along Sunset Boulevard north of the Project Site and along Santa Monica Boulevard south of the Project Site are identified in the Mobility Plan. There is also an existing sharrow[10] bicycle routes route (Tier 1) along Wilcox Avenue, adjacent to the Project Site. Other nearby sharrow bicycle routes exist along Selma Avenue to north of the Project Site and along Fountain Avenue to the south of the Project Site.

e. Future Transportation Context

The Mobility Plan identifies the following corridors proposed to receive improved bicycle, pedestrian and vehicle infrastructure improvements in the study area:

- Planned Tier 1 facilities in the study area include Hollywood Boulevard
- Planned Tier 2 facilities in the study area include Vine Street
- Planned Tier 3 facilities in the study area include Cahuenga Boulevard, Sunset Boulevard, and Santa Monica Boulevard

Figure 4 of the Transportation Assessment illustrates the planned bicycle improvements (along with existing bike facilities) in the study area per the Mobility Plan.

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[9] *Pedestrian Enhanced Districts establish areas where improvements for pedestrians are prioritized relative to other roadway users. Pedestrian Enhanced Districts may be located near schools, transit stations, areas of high pedestrian activity, areas with high collision frequency, or other placemaking opportunities.*

[10] *A sharrow is a space in a road designated for sharing between bicyclists and vehicles.*

The Transportation Assessment also considers the effects of other development proposals (related projects) either proposed, approved, or under construction near the Project Site. The list of related projects was compiled based on information obtained from the Department of City Planning and LADOT, as well as recent studies of projects in the study area. A total of 55 related development projects were identified in the vicinity of the Project Site, as shown in Figure III-1 and listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. Although the buildout years of many of these related projects are uncertain and may well be beyond the Project's buildout year, and notwithstanding that some may not be approved or developed, all related projects were considered.

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, roadway, bicycle and pedestrian facilities;

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

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

Threshold (d): Result in inadequate emergency access.

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

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018 and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines Update*, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The *CEQA*

Transportation Analysis Guidelines Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG. The analysis in this section and the Transportation Assessment, included as Appendix J of this Draft EIR, uses the latest version of the TAG updated by LADOT in 2020.

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

As described above, the CEQA Guidelines' Transportation Threshold (a) has been updated to require an analysis of the Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the applicable plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. In accordance with the LADOT TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent.

As discussed in the Transportation Assessment, a project would not be shown to result in an impact merely based on whether a project would not implement an adopted plan, program, ordinance or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies.[11] Furthermore, under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

(3) 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.[12] The TAG identifies significance thresholds to

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[11] *City of Los Angeles Department of Transportation, Transportation Assessment Guidelines, page 2-2 (July 2020).*

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

apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

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

The City's VMT impact criteria for development projects is specified in Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG. Per the criteria, a development project would have a potential significant impact if the project meets one or more of the following:

- For residential projects, a development project may have a potential significant impact if it generates 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. The Project does not have a residential component.

- For office projects, a development project may have a potential significant impact if it generates work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located. The Project is located in the Central APC and the corresponding threshold is 7.6 daily VMT per employee. This criterion was used for the office component of the Project.

Local-serving retail development tends to shorten trips and reduce VMT whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT. Local-serving is defined as retail uses (including restaurants) that are less than 50,000 square feet. The restaurant component of the Project totals 14,186 square feet and is considered to be local serving. Therefore, this portion of the Project is considered to not have a significant VMT impact.

Per the TAG, a project could have a significant cumulative impact on VMT if the project has both a significant project-level impact as determined above and is not consistent with the RTP/SCS in terms of development location, density, and intensity.

(b) VMT Analysis Methodology

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

(i) Travel Behavior Zone

The City 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's VMT Calculator Documentation, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as follows:

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

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

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

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

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

(ii) Mixed-Use Development Methodology

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

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

(iii) Travel Demand Forecasting

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

(iv) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including *2012 Developer Fee Justification Study* (Los Angeles Unified School District, 2012); the San Diego Association of Governments Activity Based Model; *Trip Generation, 9th Edition* (Institute of Transportation Engineers, 2012); the United States Department of Energy; and other modeling resources.[13] A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.

(v) Transportation Demand Management Measures

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

1. Parking

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

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

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

(4) 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 a project's proximity to streets identified in the HIN or the Safe Routes to School program. Significance may be determined qualitatively or quantitatively as best suits the circumstances of each project. If a significant impact is identified, mitigation measures may include installation of new traffic control devices, redesign or relocation of access points, turn restrictions, pavement markings, or vehicular demand management.

As discussed above in Regulatory Framework, in May 2020, LADOT provided interim guidance on freeway safety analysis 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. This analysis is included as part of this threshold.

If a freeway ramp analysis is required, the interim guidance provides the following steps to determine if a project may constitute a potential safety impact under CEQA:

- For the identified freeway off-ramps, prepare a queuing study for the "Future with Project" conditions for the proposed project build-out year. Evaluate the

adequacy of the existing and future storage lengths with the 95th percentile queue and 100 percent of the storage length on each lane of the ramp from the stop line to the gore point. When an auxiliary lane is present, add 50% of the length of the auxiliary lane to the ramp storage area.

- If the proposed project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the proposed project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the addition of traffic generated by the proposed project would increase the overflow onto the mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact

- If a proposed project adds two or more car lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact. If the speed differential is 30 mph or more, then there is a potential safety issue. The Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data including location-based services data from available sources could be used.

- If the speed differential is 30 mph or more, which may result in a potential safety issue, the guidance suggests a proposed project should consider the following preferred corrective measures to offset a potential safety issue:

  – Transportation demand management program(s) to reduce the project's trip generation,

  – Investments to active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's trip generation, and/or

  – Potential operational change(s) to the ramp terminal operations including, but not limited to, lane reassignment, traffic signalization, signal phasing or timing modifications, etc. This option requires coordination with Caltrans and LADOT to assess feasibility and for approval of the proposed measure(s).

A physical change to the ramp itself (addition of auxiliary lane, ramp widening, etc.) may be considered. However, this change would have to demonstrate substantial safety benefits, not be a VMT-inducing improvement, and not result in other environmental issues. If the cost of the physical change to the ramp is substantial, then a fair-share contribution to the improvement may be required if necessary requirements are met, including, but not

limited to, Caltrans defining the improvement cost, and opening a Project File/Project Account to accept a financial contribution for the improvement.

(5) Emergency Access

The analysis of the Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. A determination was made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would implement the following project design feature:

Project Design Feature TR-PDF-1: 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:

- A worksite traffic control plan(s), approved by the City of Los Angeles, will be implemented to route vehicular traffic, transit, bicyclists, and pedestrians around any lane and/or sidewalk closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction, including temporary traffic constraints, temporary loss of access, and temporary loss of bus stops or rerouting of bus lines;
- 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; and
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Attachment D, Plan Consistency Worksheet, of the TAG identifies a series of City adopted programs, plans, ordinances, and policies that establish the transportation planning regulatory framework for development in the City. Attachment D of the TAG also provides a series of questions to help guide the review of the identified documents. Those questions and their responses are provided in Appendix B of the Transportation Assessment, included as Appendix J of this Draft EIR.

Each of the documents listed in Attachment D of the TAG was reviewed for applicability to the Project, and the relevant transportation-related policies are described below, along with the Project's conformance.

Based on the TAG, the following plans, policies, and programs are relevant to analysis under Threshold (a) for the Project: Mobility Plan 2035; Hollywood Community Plan; Hollywood Redevelopment Plan; the LAMC; Vision Zero; the Citywide Design Guidelines; a Plan for a Healthy Los Angeles; and SCAG's RTP/SCS. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below. Also refer to Section IV.E, Land Use and Planning, of this Draft EIR for a discussion of the Project's consistency with the applicable goals and objectives of the Mobility Plan.

(a) Mobility Plan 2035

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

1. Safety First: 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 standards 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.

Mobility Plan 2035 further enumerates a variety of policies and programs in support of those goals. The policies and programs that are applicable to the Project are identified in Appendix C of the Transportation Assessment, included as Appendix J of this Draft EIR. A summary of the analysis from the Transportation Assessment is provided below and in Table IV.H-1 on page IV.H-29.

With regard to Mobility Plan 2035 public right-of-way classification standards for dedications and improvements, Sunset Boulevard north of the Project Site is designated as an Avenue I in the Mobility Plan and is part of the PED, the HIN, the Bicycle Lane Network (proposed Tier 3 Bicycle Lane), and the VEN. Wilcox Avenue along the west boundary of the Project Site is designated as a Modified Avenue III and is part of the PED in the Mobility Plan. De Longpre Avenue, south of the Project Site, and Cole Place, east of the Project Site, are designated as Local Streets (Standard) in the Mobility Plan. As discussed in the Transportation Assessment, the Project would not conflict with or preclude modifications identified for these streets. Specifically, the Project would not narrow or permanently remove pedestrian facilities along any of the surrounding streets nor would the Project conflict with the bike route along Wilcox Avenue or the City's ability to implement bicycle lanes on Sunset Boulevard.

The Transportation Assessment further considers Mobility Plan 2035 public right-of-way policy alignment with Project-initiated changes. As detailed in the Transportation Assessment, the Project would widen the Sunset Boulevard sidewalk between Cole Place and Wilcox Avenue to provide additional space and step back for the restaurant frontage. This would include a limited merger of the public right-of-way of Sunset Boulevard along the north frontage of the Project Site. The Project would maintain Sunset Boulevard's current roadway width of 70 feet, which complies with the Mobility Plan requirements for an Avenue I designation. With regard to Wilcox Avenue, the Project proposes a merger area along the public right-of-way portion of Wilcox Avenue, which is currently covered by landscaping. This merger would maintain the existing portion of the sidewalk that has a width of 10 feet, which is consistent with the Mobility Plan minimum width requirements for a Pedestrian Walkway. An on-street passenger loading zone for rideshare services is proposed along the east curb of Wilcox Avenue adjacent to the Project Site. Wilcox Avenue will maintain its existing roadway width of 40 feet. De Longpre Avenue along the south

Table IV.H-1
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan[a]	Would the Project Conflict?
Chapter 1: Safety First	
Policy 1.1 Roadway User Vulnerability Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.	**No Conflict.** The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed driveways along both Wilcox Avenue and Cole Place would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. The Project would introduce new vehicle access driveways to the Project Site from the public right-of-way, while maintaining the total number of driveways that exist today. Therefore, the Project would not conflict with Mobility Plan Policy 1.1.
Chapter 2: World Class Infrastructure	
Policy 2.1 Adaptive Reuse of Streets Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	**No Conflict.** The Project would include a request for widening of the frontage sidewalk of Sunset Boulevard between Cole Place and Wilcox Avenue along the north frontage of the Project Site to provide additional space and step back for the restaurant frontage.[14] The Project would maintain Sunset Boulevard's current roadway width of 70 feet, which complies with the Mobility Plan requirements for an Avenue I designation. The Project also requests a merger area along the right-of-way portion of Wilcox Avenue, which is currently covered by landscaping. This merger would maintain the existing portion of the sidewalk that has a width of 10 feet, which is consistent with the Mobility Plan minimum width requirements for a Pedestrian Walkway. An on-street passenger loading zone for rideshare services is proposed along the east curb of Wilcox Avenue adjacent to the Project Site. The existing widths along De Longpre Avenue and Cole Place are consistent with the designated dimensions in the Mobility Plan and would be maintained as part of the Project. The Project would not alter adjacent streets or the right-of-way in a manner that would preclude or conflict future changes by the City. The Project would replace 12 existing street trees on the sidewalks along Sunset Boulevard, Wilcox Avenue, and Cole Place with 24 new trees. Therefore, the Project would not conflict with Mobility Plan Policy 2.1.

[14] *The existing roadway width and right-of-way designations will be maintained according to the definitions in the Mobility Plan.*

Table IV.H-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan[a]	Would the Project Conflict?
Policy 2.3 Pedestrian Infrastructure Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** The Project would not narrow or permanently remove pedestrian facilities. Pedestrian access to the Project Site would be provided through pedestrian points of entry along Sunset Boulevard and Wilcox Avenue. Also refer to Policy 2.1, above. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.
Policy 2.4 Neighborhood Enhanced Network Provide a slow speed network of locally serving streets.	**No Conflict.** The NEN is a selection of local streets to provide comfortable and safe routes for localized travel of slower-moving modes, such as walking or biking. None of the Project frontages are along streets that are on the NEN. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.
Policy 2.5 Transit Network Improve the performance and reliability of existing and future bus service.	**No Conflict.** Sunset Boulevard is part of the TEN. The Project would not impact any existing transit stops. In addition, the Project would promote the use of public transit through the location of commercial uses, inclusive of office and restaurant uses, in a transit-rich area. Therefore, the Project would not conflict with Mobility Plan Policy 2.5.
Policy 2.10 Loading Areas Facilitate the provision of adequate on and off- street loading areas.	**No Conflict.** As previously described above, an on-street passenger loading zone for rideshare services is proposed along the east curb of Wilcox Avenue adjacent to the Project Site. The Project also includes a loading zone for loading and trash operations with a tertiary driveway along Cole Place. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.
Chapter 3: Access for All Angelenos	
Policy 3.1 Access for All Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	**No Conflict.** The Project would provide infrastructure (secure bicycle parking, easy bicycle accessibility to the Project Site, pedestrian points of entry along Sunset Boulevard and Wilcox Avenue) to encourage alternative mobility for employees and visitors to the Project Site. The Project would also encourage increased transit usage by locating a new commercial project with convenient access to several public transit options. The Project would introduce new vehicle access driveways to the Project Site from the public right-of-way, while maintaining the total number of driveways that exist today. Also refer to Policy 2.1, above. Therefore, the Project would not conflict with Mobility Plan Policy 3.1.
Policy 3.2 People with Disabilities Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** The Project would be designed consistent with all requirements from the ADA and would, therefore, accommodate the needs of people with disabilities. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.

Table IV.H-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan[a]	Would the Project Conflict?
Policy 3.3 Land Use Access and Mix Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No Conflict.** The Project would support this policy through the development of commercial uses, inclusive of office and restaurant uses, in proximity to employment, destinations, and other neighborhood services in a transit-rich area, and in a designated TPA. Additionally, the Project's TDM program in compliance with City requirements would further reduce vehicle trips. Therefore, the Project would not conflict with Mobility Plan Policy 3.3.
Policy 3.5 Multi-Modal Features Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	**No Conflict.** The Project would support multi-modal travel by maintaining the existing sidewalks, providing onsite bicycle parking, being in close proximity to the Metro Line 2 along Sunset Boulevard, the Metro Rapid Bus routes along Hollywood Boulevard and Santa Monica Boulevard, and located 0.4-mile distance from rail transit (Metro B Line). Therefore, the Project would not conflict with Mobility Plan Policy 3.5.
Policy 3.8 Bicycle Parking Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	**No Conflict.** The Project would provide convenient and secure long-term and short-term parking for bicycles in accordance with LAMC bicycle parking requirements. There would also be a dedicated shower station for bicyclists. Therefore, the Project would not conflict with Mobility Plan Policy 3.8.
Policy 3.9 Increased Network Access Discourage the vacation of public rights-of-way.	**No Conflict.** The Project does not propose to vacate or otherwise restrict public access to a street, alley, or public stairway. The Project would maintain the 10-foot wide alley between Wilcox Avenue and Cole Place in-lieu of the required 20-foot suggested width for alleys by the City's Mobility Plan. The Project would not use this alley for direct Project access, but drive-through access would be maintained. Therefore, the Project would not conflict with Mobility Plan Policy 3.9.
Policy 3.10 Cul-de-sacs Discourage the use of cul-de-sacs that do not provide access for active transportation options.	**No Conflict.** The Project is not located adjacent to an existing cul-de-sac and would not create a cul-de-sac. Therefore, the Project would not conflict with Mobility Plan Policy 3.10.
Chapter 4: Collaboration, Communication, & Informed Choices	
Policy 4.1 New Technologies Support new technology systems and infrastructure to expand access to transportation choices.	**No Conflict.** The Project does not propose elements that would limit or preclude the City's ability to offer or introduce new technology systems or infrastructure. Therefore, the Project would not conflict with Mobility Plan Policy 4.1.
Policy 4.7 Performance Evaluation Evaluate performance of new transportation strategies through the collection and analysis of data.	**No Conflict.** The Project would comply with requests by LADOT to monitor the performance of the Project's TDM program. Therefore, the Project would not conflict with Mobility Plan Policy 4.7.

Table IV.H-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan[a]	Would the Project Conflict?
Policy 4.8 Transportation Demand Management Strategies Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** The Project's TDM program includes the following measures: • Provide designated parking spaces and loading areas for employee carpools and vanpools; and • Provide sustainability features for alternative, low-carbon modes of transportation, such as a protected bicycle storage facility and electric vehicle charging infrastructure. Therefore, the Project would not conflict with Mobility Plan Policy 4.8.
Policy 4.13 Parking and Land Use Management Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** The Project would not conflict with the portion of Mobility Plan Policy 4.13 that discourages utilizing land for parking that could have been used for other valuable uses since all parking would be located in either a subterranean parking garage or a fully-enclosed above-grade garage. Moreover, employees and visitors would have to pay for parking; therefore, the Project does not conflict with the policy regarding the abundance of free parking. The Project would include features to encourage walking and bicycling, would provide the number of bicycle parking spaces required by LAMC, and would implement a TDM program to promote multi-modal transportation. Furthermore, the Project would be consistent with the applicable goals and objectives of SCAG to locate jobs and housing in infill locations served by public transportation and facilitating active transportation. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.1 Sustainable Transportation Encourage the development of a sustainable transportation system that promotes environmental and public health.	**No Conflict.** The Project would encourage sustainable transportation through the development of commercial uses that would be located in a transit rich area and include bicycle parking and enhanced sidewalks. Therefore, the Project would not conflict with Mobility Plan Policy 5.1.
Policy 5.2 Vehicle Miles Traveled (VMT) Support ways to reduce vehicle miles traveled (VMT) per capita.	**No Conflict.** The Project is estimated to generate lower VMT per capita for employees than the average for the area, as demonstrated further below in Threshold (b). The Project would also implement a TDM program in accordance with City requirements to further reduce VMT. Therefore, the Project would not conflict with Mobility Plan Policy 5.2.
Policy 5.4 Clean Fuels and Vehicles Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	**No Conflict.** The Project would provide electric vehicle (EV) charging stations per LAMC requirements to encourage the use of clean fuels and vehicles. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.

Table IV.H-1 (Continued)
Project Consistency With Mobility Plan 2035

Objective, Policy, Program, or Plan[a]	Would the Project Conflict?
Policy 5.5 Green Streets Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	**No Conflict.** Capture and use systems would be implemented for the Project and stormwater would be reused for irrigation. Therefore, the Project would not conflict with Mobility Plan Policy 5.5.
Program PL.1 Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. **Policy PK.10** Pedestrian Improvement Incentives. Establish an incentive program to encourage projects to retrofit parking lots, structures and driveways to include pedestrian design features.	**No Conflict.** Consistent with Mobility Plan 2035 Policies PL.1 and PK.10, which encourage vehicular access from non-arterial streets (or alleys), the Project would include access to the Project Site via non-arterial driveways and loading access along Cole Place.

[a] *Objectives, Policies, Programs, or Plans based on information provided in Mobility Plan 2035: An Element of the General Plan (Los Angeles Department of City Planning, January 2016).*

Source: Eyestone Environmental, 2022.

boundary of the Project Site has a roadway width of 36 feet and a right-of-way width of 60 feet. These widths are consistent with the designated dimensions in Mobility Plan and would be maintained as part of the Project. Cole Place along the east boundary of the Project Site has a roadway width of 36 feet and a right-of-way width of 60 feet. These widths are consistent with the designated dimensions in Mobility Plan and would be maintained as part of the Project.

Additionally, as detailed in Table IV.H-1 on page IV.H-29, the Project would not conflict with applicable Mobility Plan 2035 policies that aim to balance the needs of various users and trip purposes through a multimodal transportation network that includes features such as loading areas, electric vehicle charging areas, and bike sharing. In particular, the Project would not conflict with Policies 2.3 (Pedestrian Infrastructure), 2.10 (Loading Areas), 3.5 (Multi-Modal Features), and 5.4 (Clean Fuels and Vehicles). As discussed in Table IV.H-1, the Project would not conflict with Mobility Plan Policy 2.3 related to pedestrian infrastructure as the Project would not narrow or permanently remove pedestrian facilities. Pedestrian access to the Project Site would be provided along Sunset Boulevard and Wilcox Avenue, with bike parking access provided from Cole Place and Wilcox Avenue. The Project also would not conflict with Mobility Plan Policy 2.10 to

consider loading areas that minimally impact other travelers such as people driving or walking. Consistent with this policy, the Project design includes a designated loading zone for loading and trash operations with a tertiary driveway along Cole Place. The Project would also not conflict with Mobility Plan Policy 3.5 as the Project would support multi-modal travel by maintaining the existing sidewalks, providing on-site bike parking, and locating the proposed uses in close proximity to several transit options.

In addition, the Project would not conflict with Mobility Plan Policy 5.4 to encourage clean fuels and vehicles as the Project would provide electric vehicle charging stations within the Project Site in accordance with LAMC requirements. Furthermore, consistent with Mobility Plan 2035 Policies PL.1 and PK.10, which encourage vehicular access from non-arterial streets (or alleys), the Project would include access to the Project Site via non-arterial driveways and loading access along Cole Place.

As discussed in the Transportation Assessment, the Project would not conflict with Mobility Plan Policy 4.13, the objective of which is to balance parking supply with other transportation and land use objectives. Specifically, the Project would not conflict with the portion of Mobility Plan Policy 4.13 that discourages utilizing land for parking that could have been used for other valuable uses since all parking would be located in a subterranean/fully-enclosed above-grade garage. Moreover, employees and visitors would have to pay for parking; therefore, the Project does not conflict with the policy regarding the abundance of free parking. While the Project would include parking in excess of the LAMC minimum requirements, it would include features to encourage walking and bicycling, would provide the number of bicycle parking spaces required by LAMC, and would implement a transportation demand management (TDM) program in accordance with City requirements to promote multi-modal transportation. Furthermore, the Project would be consistent with the applicable goals and objectives of SCAG to locate jobs and housing in infill locations served by public transportation (RTP Objective: Location Efficiency) and facilitating active transportation and TDM (RTP Objectives: Safety and Health / Transportation System Sustainability). Therefore, the Project would not undermine broader regional goals of creating vibrant public spaces (RTP Goal: Supporting Commerce, Economic Growth, and Opportunity) and a robust multi-modal transportation system (RTP Goal: Giving People More Transportation Choices). As previously noted, under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Therefore, although the Project's parking may exceed the LAMC's minimum requirements, the Project would be consistent with the overall intent of Policy 4.13 and the Mobility Plan. The Project also would not conflict with Mobility Plan Policy 3.8 regarding bicycle parking as the Project would provide the required short-term and long-term bicycle parking. In addition, the long-term bicycle parking would be enclosed in a protected storage facility and have its own access point, which would enhance the safety and overall quality of the travel experience of the cyclist.

Overall, as detailed in Appendix C 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 does not conflict with the Mobility Plan.

(b) Hollywood Community Plan

A detailed analysis of the Project's consistency with the Hollywood Community Plan is provided in Appendix C of the Transportation Assessment. As discussed therein, 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 Hollywood 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. Specifically, the Project would be consistent with the applicable street standards and criteria policy as the proposed frontage roadway widths and right-of-way would be consistent with Mobility Plan standards as previously discussed above. The Project would also not conflict with other relevant policies and programs, as detailed in the Transportation Assessment, including policies and programs related to circulation (HO-6: Public Improvements—Circulation) and public transportation improvements and specific programs to improve intersections in the study area (Objective 6 and HO-4: Standards and Criteria). Specifically, as provided in the Transportation Assessment, the frontage roadway widths and right-of-way would be consistent with the Mobility Plan, including the proposed merger area along Wilcox Avenue and the sidewalk widening along Sunset Boulevard. In addition, the Project would not conflict with or prevent the City from pursuing the public improvements identified in the Hollywood Community Plan. In summary, the Project would not conflict with applicable policies of the Hollywood Community Plan addressing the circulation system.

(c) Hollywood Redevelopment Plan

A detailed analysis of the Project's consistency with the Hollywood Redevelopment Plan is provided in Appendix C of the Transportation Assessment. As described in the Transportation Assessment, 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 the following goal regarding transportation: 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 Site and vicinity are well served by a variety of public transit options, including local and regional bus lines and heavy rail subway service. In particular, the Project Site is located immediately adjacent to the Metro 2 Local Line on Sunset Boulevard and 0.4 mile from the Metro B (Red) Line Hollywood/Vine Station. The Metro 2 Local Line on Sunset Boulevard contains one stop directly across the street from the Project Site (westbound direction) and includes two bus benches and two trash bins. The eastbound direction local bus route includes an existing bus stop along Sunset Boulevard directly west of the Project Site, across Wilcox Avenue, and includes one bus bench and one additional bus shelter. LADOT Downtown Area Shuttle (DASH) also provides bus transit service in the area. The Project's proximity to these various public transit options would not be in conflict with the goal of the Hollywood Redevelopment Plan to support and encourage a circulation system which will improve the quality of life Hollywood. Additionally, Section 518 of the Hollywood Redevelopment Plan provides guidance regarding circulation, parking, and loading facilities. As detailed in the Transportation Assessment, the Project would not conflict with applicable policies, including improving traffic flow along certain corridors in the plan area (Section 518.1—Circulation) and designing parking facilities to promote public safety and prevent unsightly or barren appearance (Section 518.2—Parking and Loading). Overall, the Project would not conflict with the applicable goal and policies of the Hollywood Redevelopment Plan addressing the circulation system.

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

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. The Project would provide the required 50 short-term and 93 long-term spaces, which would meet the LAMC requirements for on-site bicycle parking supply. Therefore, the Project would be consistent with LAMC Section 12.21 A.16.

(e) LAMC Section 12.26 J (TDM Ordinance)

LAMC Section 12.26 J establishes TDM requirements for non-residential projects, as well as non-residential components of mixed-use projects bigger than 25,000 square feet. Key requirements of the TDM Ordinance include displaying information regarding alternative transportation modes, providing carpool/vanpool parking spaces and loading areas, and walkways between buildings and public sidewalks. Pursuant to the requirements of the TDM Ordinance, the Project design would implement the following TDM strategies: bicycle parking and bicycle amenities, designated parking areas for carpooling/vanpooling employee programs, pedestrian enhancements design, and posing alternative modes of travel on the Project Site for employees and visitors. The Project would therefore be consistent with the current TDM Ordinance.

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

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The north boundary of the Project Site, Sunset Boulevard, is identified as part of the City's HIN. No specific Vision Zero projects are planned for Sunset Boulevard adjacent to the Project Site, and the Project would not conflict with the implementation of future Vision Zero projects in the public right-of-way. The Project would not conflict with the goals and objectives set forth in Vision Zero, including eliminating traffic deaths citywide by 2025 and prioritizing efforts on the HIN, as the Project would focus Project Site access via driveways along Wilcox Avenue and Cole Place, and not along Sunset Boulevard, which would help minimize the potential for vehicle, pedestrian, and bicycle conflicts. Thus, the Project would not conflict with Vision Zero.

(g) Citywide Design Guidelines

The Project Site is within a vibrant commercial area in the Hollywood Community Plan Area. The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential, commercial, and mid-rise office buildings, which vary widely in building style and period of construction. Land uses adjacent to the Project Site include the Rise Hollywood mixed-use development, the Los Angeles Police Department Hollywood Station, and the LAFD Station 27 south of the Project Site; the 14-story CNN building east of the Project Site; and an 11-story office building located west of the Project Site. The Project would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The Project in particular would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood.

As discussed above, the Citywide Design Guidelines are organized around three design approaches: pedestrian-first design, 360 degree design, and climate-adapted design. The three guidelines under pedestrian-first design are applicable to the Project in that they seek to promote a safe, comfortable and accessible pedestrian experience, to carefully incorporate vehicular access to avoid degrading the pedestrian experience, and to design projects to actively engage with streets and public space. Consistent with the Citywide Design Guidelines, the Project enhances the pedestrian experience particularly along Sunset Boulevard with planted sidewalks, low-level exterior lights, large use of opacity architectural elements and restaurant uses. Within the Project Site, the Project would provide lighted pedestrian walkways. Additionally, the Project incorporates commercial and office uses oriented toward Sunset Boulevard to help encourage pedestrian engagement.

The Project would provide subterranean and fully-enclosed above grade parking. All Project parking would be hidden or screened from the street. There would be several

access points with specific purposes to the parking podium around the Project Site, located in such a way as to minimize interaction between vehicles and pedestrians. The access points would be designed in accordance with City standard plans for driveways and would be subject to LADOT review with the Project Site plan.

Based on the above, the Project would be consistent with the Citywide Design Guidelines. Refer to Section IV.E, Land Use and Planning, of this Draft EIR, for additional analysis of the Project's consistency with the Citywide Design Guidelines.

(h) Plan for a Healthy Los Angeles

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table IV.H-2 on page IV.H-39. In summary, the Project would promote healthy living by redeveloping an underutilized site with new commercial uses in a transit rich area where active travel modes are encouraged. The Project would also provide employment opportunities through the restaurant and office spaces at the Project Site. The office and restaurant uses would be easily accessed by foot from surrounding residential neighborhoods. Finally, the Project is estimated to generate lower VMT per capita for employees than the average for the area, as demonstrated in the analysis further below. Further, the Project would implement a TDM program in accordance with City requirements to further reduce VMT per capita. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.

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

(i) Other Plans and Policies

As discussed in detail in Section IV.E, Land Use and Planning, of this Draft EIR, the Project would not conflict with SCAG RTP/SCS 2020-2045 policies related to encouraging pedestrian activity and reducing VMT.

(j) Conclusion

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

Table IV.H-2
Project Consistency With Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan[a]	Would the Project Conflict?
Chapter 1: Los Angeles, a Leader in Health and Equity	
Policy 1.5 Plan for Health Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	**No Conflict.** The Project would encourage sustainable transportation through the development of commercial uses that would be located in a transit rich area and include bicycle parking and enhanced sidewalks. As such, it would encourage the use of active travel modes and thereby promote healthy living. Therefore, the Project would not conflict with Plan for a Healthy Los Angeles Policy 1.5.
Policy 1.6 Poverty and Health Reduce the debilitating impact that poverty has on individual, familial, and community health and well-being by: promoting cross-cutting efforts and partnerships to increase access to income; safe, healthy, and stable affordable housing options; and attainable opportunities for social mobility.	**No Conflict.** The Project would include restaurant and office space which would provide employment opportunities, and help in reducing the debilitating impact that poverty has on individual, familial, and community health and well-being. Therefore, the Project would not conflict with Plan for a Healthy Los Angeles Policy 1.6.
Policy 1.7 Displacement and Health Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.	**No Conflict.** As discussed above, the Project would provide employment opportunities through its provision of restaurant space and office space. The Project would not displace any existing housing; rather, it would convert underutilized land into an active and vibrant commercial development. Therefore, the Project would not conflict with Plan for a Healthy Los Angeles Policy 1.7.
Chapter 5—An Environment Where Life Thrives	
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.	**No Conflict.** The Project is estimated to generate lower VMT per capita for employees than the average for the area, as demonstrated below. Further, the Project would implement a TDM program in accordance with City requirements to further reduce VMT per capita. VMT directly contributes to GHG emissions. As such, a reduced VMT per capita also reduces GHG per capita. Therefore, the Project would not conflict with Plan for a Healthy Los Angeles Policy 5.7.

[a] *Objectives, Policies, Programs, or Plans based on information provided in Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Los Angeles Department of City Planning, March 2015).*

Source: Eyestone Environmental, 2022.

(2) Mitigation Measures

Project-level impacts with respect to conflict with a program, plan, ordinance, or policy 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 conflict with a program, plan, ordinance, or policy addressing the circulation system were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant without mitigation.

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

(1) Impact Analysis

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

As discussed above, the Project Site is located in the Central Area Planning Commission and is subject to the following LADOT threshold for determining VMT impacts: Work VMT per Employee of 7.6.

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The Project's land uses and their respective sizes are the primary input in the VMT Calculator. The work VMT was estimated for the office land use. Since the proposed restaurant space would be less than 50,000 square feet, it is considered local serving (per the TAG). The proposed LADWP equipment area does not constitute floor area as defined by the LAMC and was not included in the analysis. As shown in Table IV.H-3 on page IV.H-41, the Project is estimated to generate 24,534 total daily VMT. Based on the Project's proposed land uses and location, the Project would result in a daily work VMT per employee of 6.1. The work VMT per employee is below the threshold of significance for the Central APC of 7.6 work VMT per employee. Thus, the Project would not have a significant impact on work VMT per employee as estimated by the VMT Calculator. **Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be less than significant.**

Table IV.H-3
VMT Analysis Summary

Land Use Information	Project
General Office	431,032 sf
High-Turnover Sit-Down Restaurant	14,186 sf
VMT Analysis[a]	
Employee Population	1,781
Project Area Planning Commission	Central
Project Travel Behavior Zone	Compact Infill (Zone 3)
Total Daily VMT	24,534
Work VMT per Employee	6.1
Impact Threshold	7.6
Significant Impact	No

sf = square feet

[a] *Project Analysis is from VMT Calculator output reports provided in Appendix D of the Transportation Assessment.*

Source: Fehr & Peers, 2021.

(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) 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 without mitigation.

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 evaluated in the Initial Study for the Project, included as Appendix A of this Draft EIR, the Project does not include hazardous geometric design features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp

curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed driveways along both Wilcox Avenue and Cole Place would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. The Project specifically includes six driveways to meet the various needs of the Project, including separate driveways for office tenants, rideshare and valet users, loading and trash operations, and for access to the LADWP equipment area. Two driveways are located on Wilcox Avenue and four driveways are located on Cole Place, a non-arterial road.

The proposed vehicular access for employees and visitors would utilize two, one-way driveways each on both Cole Place and Wilcox Avenue. These driveways would provide access to parking and would permit efficient provision of an off-street passenger loading zone for valet services, which would minimize conflicts at any individual location. An on-street passenger loading zone is also proposed for rideshare services along the east curb of Wilcox Avenue adjacent to the Project Site. The Project driveways would be level for approximately 30 feet within the Project Site before they intersect the sidewalks. The loading areas for the Project would be located on the ground floor level, with trucks entering and exiting to/from a separate loading dock driveway off Cole Place. The sixth driveway would be provided on Cole Place for dedicated access to the LADWP equipment area. Pedestrian access to the Project Site would be provided via sidewalks around the perimeter of the Project Site. Visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. Overall, the proposed driveways would not create hazards to the surrounding streets. The driveways also would not require the removal or relocation of existing transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. As previously noted, Sunset Boulevard adjacent to the Project Site is part of the designated HIN; however, the Project driveways would be located along Wilcox Avenue and Cole Place. The proposed driveways would not be along the HIN. While Wilcox Avenue is a sharrowed bike route, the two Project driveways would be one-way, and placed approximately 330 feet south of the intersection of Sunset Boulevard and Wilcox Avenue, which would help minimize the potential for vehicle/vehicle and vehicle/bicycle conflicts. In addition, the loading driveway would be placed along Cole Place, which is a local street. As a result, the Project would not substantially increase hazards, conflicts, and would contribute to overall walkability and bike-ability through enhancements to the Project Site. Refer to Appendix E of the Transportation Assessment for more detailed responses to the TAG evaluation questions related to this threshold.

The proposed uses would also 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.

As discussed above in Regulatory Framework, in May 2020, LADOT provided interim guidance on freeway safety analysis 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.

LADOT's Interim Guidance for Freeway Safety Analysis 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, the Project is projected to add 25 or more trips to the US-101 Southbound Off-ramp & Cahuenga Boulevard (A.M. peak hour) and the US-101 Northbound Off-ramp & Sunset Boulevard (A.M. peak hour). A queuing study for the "Future with Project" conditions was conducted for the Project buildout year (2026) using trip generation and future traffic volumes detailed in the Transportation Assessment. Per the guidance, the adequacy of the existing and future storage lengths was evaluated with the 95th percentile queue where 100 percent of the storage length on each lane of the ramp from the stop line to the gore point was used. For the US-101 Southbound Off-ramp to Cahuenga Boulevard, where an auxiliary lane is present, 50 percent of the length of the auxiliary lane was added to the ramp storage area.

As provided in the Transportation Assessment, the queue length of the US-101 Southbound Off-ramp to Cahuenga Boulevard is not projected to exceed ramp capacity in the Future Base or Future plus Project scenarios during the A.M. peak hour. Although the Project is projected to add six car lengths (assuming an average queue storage length of 25 feet per car) to the queue in the A.M. peak hour, the addition would not exceed the ramp storage in the A.M. peak hour. Therefore, the Project is not projected to have a significant safety impact for the US-101 Southbound Off-ramp to Cahuenga Boulevard, and no further analysis would be required for this off-ramp.

As detailed in the Transportation Assessment, the queue length of the US-101 Northbound Off-ramp to Sunset Boulevard is projected to exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus Project scenario. The Project is projected to add 15 car lengths to the queue in the A.M. peak hour. Since the Project is

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

(2) Mitigation Measures

Per LADOT's Interim Guidance for Freeway Safety Analysis, operational changes have been explored to mitigate the potential safety issue at the US-101 Northbound Off-ramp to Sunset Boulevard. The following mitigation measure was identified:

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

(3) Level of Significance After Mitigation

As detailed in the Transportation Assessment, Mitigation Measure TR-MM-1 would address the identified safety issue by partially alleviating congestion on Sunset Boulevard that in turn affects the off-ramp, reducing the off-ramp queue onto the freeway mainline to less than what would occur under Future without Project conditions and fully mitigating the Project impact. It is noted that a related project in the vicinity of the off-ramp also proposes this same mitigation measure. Subject to City approval, the two projects could, therefore, share the mitigation, with the caveat that if, for any reason, one project were to not go forward, the other project would be fully responsible for the mitigation. Notwithstanding, with implementation of Mitigation Measure TR-MM-1, potential safety issues at the US-101 Northbound Off-ramp to Sunset Boulevard would be fully mitigated, and Project level impacts would be reduced to less than significant with mitigation.

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

As evaluated in the Initial Study for the Project, included as Appendix A of this Draft EIR, and summarized in Section VI, Other CEQA Considerations, of this Draft EIR, while it is expected that the majority of construction activities for the Project would be confined to

the Project Site, limited off-site construction activities 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, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Additionally, 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. Therefore, as concluded in the Initial Study, the Project would not result in inadequate emergency access, and impacts regarding Threshold (c) were determined to be less than significant, and no further analysis is required.

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 55 potential 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 developments incorporating some or all of these elements. The nearest related project to the Project Site is Related Project No. 12, a proposed hotel at 6445 W. Sunset Boulevard, across from the Project Site and to the east. Given that the Project and the 6445 W. Sunset Boulevard project do not have driveways on the same street on the same block, the 6445 W. Sunset Boulevard project is not expected to have a cumulative impact. Other related projects located farther from the Project Site would not share adjacent street frontages with the Project Site. Accordingly, no significant cumulative impacts are anticipated to which both the Project and other nearby related projects would contribute in regard to City transportation policies or standards adopted to protect the environment and support multimodal transportation options.

Overall, implementation of the Project, together with the related projects, would not create inconsistencies with the Mobility Plan, Hollywood Community Plan, Hollywood Redevelopment Plan, the LAMC, Vision Zero, the Citywide Design Guidelines, the City's Plan for a Healthy Los Angeles, and SCAG's RTP/SCS. The related projects primarily propose high-density residential, office, and commercial 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 related project would also include the required number of bicycle parking spaces in accordance with LAMC requirements and would not conflict with the City's TDM Ordinance.

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 GHG reduction targets. 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 is 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. Specifically, the Project Site is located in a transit-rich neighborhood serviced by Metro local and rapid bus lines and LADOT regional lines. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage employees of the Project Site to walk to nearby destinations to meet their shopping needs, thereby reducing VMT and GHG emissions. Furthermore, as described in detail above, the Project's restaurant uses would be local-serving and would not result in a net increase in areawide VMT. **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. As discussed above, the nearest related project to the Project Site is Related Project No. 12, a proposed hotel development at 6445 W. Sunset Boulevard, located across from the Project Site and to the east. However, Related Project No. 12 and the Project would not have driveways on the same street on the same block and is not expected to have a cumulative impact. Other related projects located farther from the Project Site would not share adjacent street frontages with the Project Site. **Therefore, Project impacts with respect to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.**

With regard to LADOT's interim guidance related to freeway safety analysis, as evaluated above, based on additional analysis of the US-101 Northbound Off-ramp to Sunset Boulevard, the queue length on the off-ramp is projected to exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus Project scenario. As such, based on LADOT's interim guidance for freeway safety, a potential safety issue at the US-101 Northbound Off-ramp to Sunset Boulevard could occur. As discussed above, with implementation of Mitigation Measure TR-MM-1, potential impacts related to this freeway ramp safety issue would be reduced to less than significant. **Therefore, Project impacts related to freeway safety would be less than significant with implementation of mitigation, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

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

As discussed above under Threshold (c) under Subsection 3.d, to mitigate the potential safety issue at the US-101 Northbound Off-ramp to Sunset Boulevard, pursuant to Mitigation Measure TR-MM-1, the Project would be required to add a protected/permitted left-turn phase with reoptimized signal timing for westbound Sunset Boulevard at Van Ness Avenue. This measure would address the identified safety issue by partially alleviating congestion on Sunset Boulevard that, in turn, would reduce the off-ramp queue onto the freeway mainline to less than what would occur under the Future without Project conditions and to a level that is within the storage capacity of the off-ramp. Therefore, the measure would mitigate Project impacts with respect to freeway off-ramp safety, and the Project's contribution would not be cumulatively considerable; additionally, the measure would mitigate impacts from cumulative traffic that would occur irrespective of the Project.

(3) Level of Significance after Mitigation

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and polices and VMT/CEQA Guidelines Section 15064.3 were determined to be less than significant without mitigation. With respect to freeway off-ramp safety, Mitigation Measure TR-MM-1 would mitigate Project impacts, and the Project's contribution would not be cumulatively considerable.