

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 Transportation Assessment for the 1000 Seward Mixed Use Development Project dated July 2021 (Transportation Study) prepared for the Project, and included in its entirety in Appendix J of this Draft EIR.

The Transportation Study was prepared pursuant to LADOT's Transportation Assessment Guidelines (TAG; July 2020) which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Study was approved by LADOT on August 12, 2021. A copy of LADOT's Assessment Letter is included as Appendix K of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Americans with Disabilities Act of 1990
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3

- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035
- Hollywood Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- Vision Zero
- Interim Guidance on Freeway Safety
- Citywide Design Guidelines

(1) Federal

(a) *Americans with Disabilities Act of 1990*

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

(2) State

(a) *Complete Streets Act*

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 CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, are updated every 8 years in conjunction with the revision schedule of housing and transportation elements.

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

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

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

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

(c) *California Vehicle Code*

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

(d) *Senate Bill 743*

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

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

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

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to CEQA include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop¹ or a stop along an existing high-quality transit corridor² should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

(3) Regional

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

In compliance with SB 375, on September 3, 2020, the Southern California Association of Government's (SCAG) Regional Council adopted the Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045

¹ “Major transit stop” is defined in Public Resources Code Section 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

² “High-quality transit corridors” are defined in Public Resources Code Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting greenhouse gas reduction targets set by CARB. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

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

The 2020–2045 RTP/SCS’ “Core Vision” prioritizes the maintenance and management of the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the “Core Vision” include but are not limited to: Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions’ overall quality of life. These benefits include but are not limited to a 5-percent reduction in VMT per capita, 9-percent reduction in vehicle hours traveled, and a two percent increase in work-related transit trips.

(4) Local

(a) *City of Los Angeles Mobility Plan 2035*

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.³ 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 and are intended to create a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows

- Arterial Streets: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
 - Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.

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.*

- Avenues pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- Collector Streets: Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.
- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
 - Continuous local streets that connect to other streets at both ends, and/or
 - Non-Continuous local streets that lead to a dead-end.

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

(b) Hollywood Community Plan

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

This Project falls within the boundaries of the Hollywood Community Plan. While an update to the Hollywood Community Plan is currently under development, the current plan remains in effect. While the 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., the B Line (Red)).

(c) *Los Angeles Municipal Code*

With regard to construction traffic, Los Angeles Municipal Code (LAMC) Section 41.40 limits construction activities to the hours from 7:00 A.M. to 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and national holidays. No construction is permitted on Sundays.

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

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

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

(d) *LADOT Transportation Assessment Guidelines*

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on vehicle miles traveled, pursuant to State CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method

to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed 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.⁴

(e) *LADOT Manual of Policies and Procedures Section 321*

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

(f) *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.

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

- Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes based on the 95th percentile queue length using Synchro or a comparable Highway Capacity Manual analysis methodology.

⁴ LADOT, *Transportation Assessment Guidelines*, July 2020.

- The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
- The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 miles per hour (mph).

Should a significant impact be identified, mitigation measures to be considered include TDM measures to reduce the project's trip generation, investments in active transportation or transit system infrastructure to reduce the project's trip generation, changes to the traffic signal timing/phasing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to improve safety, not induce greater VMT, and not result in secondary environmental impacts.

(g) Vision Zero

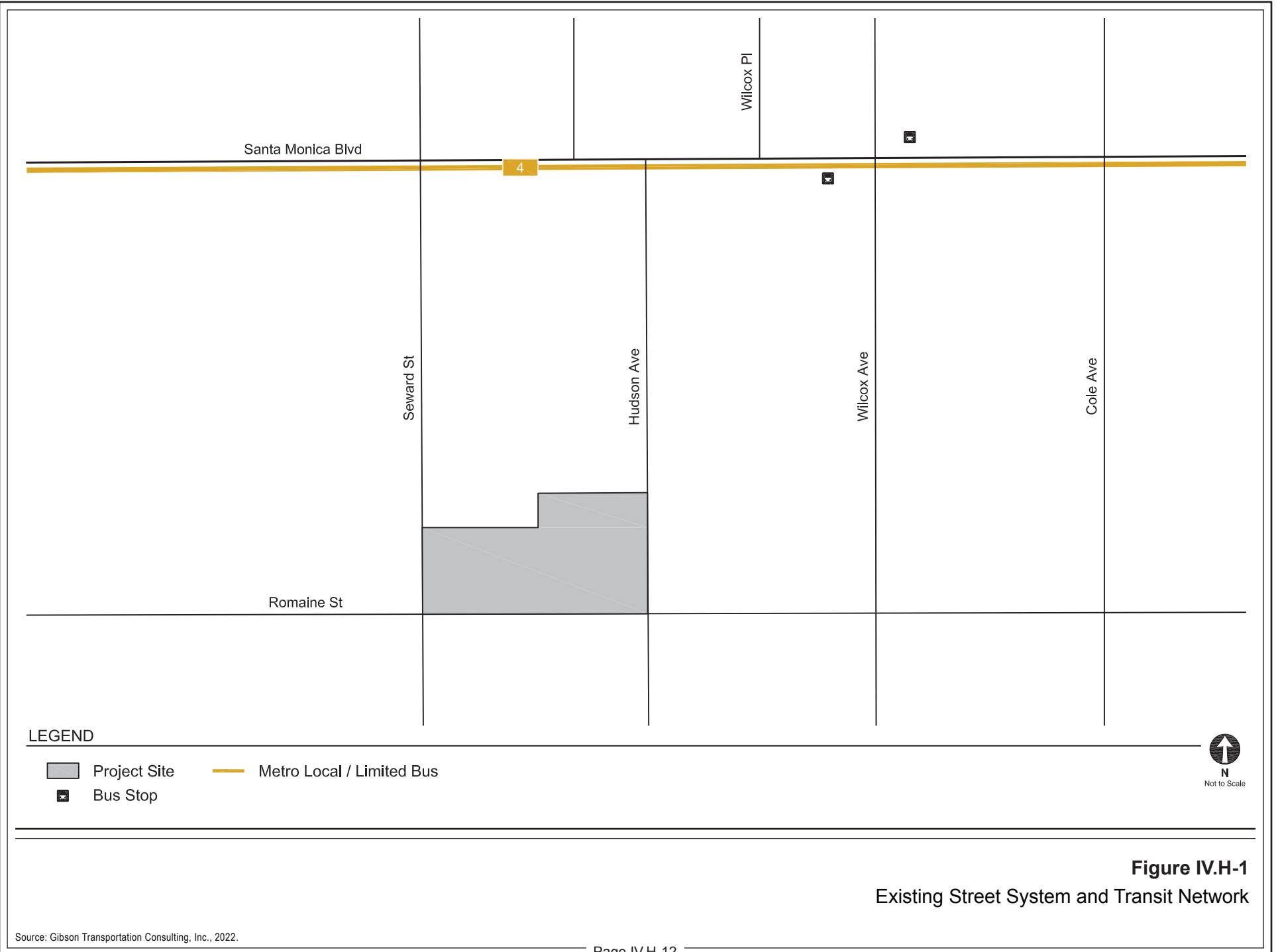
The Vision Zero Los Angeles program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017; and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified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

(h) Citywide Design Guidelines

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

b. Existing Street Systems

The existing street system in the study area consists of freeways, arterials, collector, and local streets, which provide regional, sub-regional, and local access and circulation 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-12.



(1) Freeways

The Project Site is located in the Hollywood Community Plan area. The Project area is served by an extensive freeway network. Primary regional access to the Project area is provided by the Hollywood Freeway (US-101), which is located approximately 1.5 miles east of the Project Site. US-101 runs in the southeast/northwest direction, extending from the East Los Angeles Interchange through Hollywood, the San Fernando Valley and beyond. In the vicinity of the study area, the Hollywood freeway provides three lanes in each direction. Access is provided via interchanges at Santa Monica Boulevard and Western Avenue.

(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.

- Santa Monica Boulevard—Santa Monica Boulevard is a designated Modified Avenue I that travels in the east-west direction and is located north of the Project Site. It generally provides four travel lanes, two lanes in each direction, with left-turn lanes at major intersections. One-hour metered parking is generally provided on both sides of the street in the vicinity of the Project Site. Travel lanes are typically 11 to 12 feet wide in the vicinity of the Project Site.
- Wilcox Avenue—Wilcox Avenue is a designated Modified Avenue III that travels in the north-south direction and is located east of the Project Site. It generally provides two travel lanes, one lane in each direction. One-hour metered and unmetered parking is generally provided on both sides of the street in the vicinity of the Project Site. The approximate paved width of Wilcox Avenue is 40 feet in the vicinity of the Project Site.
- Hudson Avenue—Hudson Avenue is a designated Local Street that travels in the north-south direction and is located adjacent to the eastern boundary of the Project Site. Two-hour unmetered parking is generally provided on the north side of the street in the vicinity of the Project Site. The approximate paved width of Hudson Avenue is 40 feet in the vicinity of the Project Site.
- Romaine Street—Romaine Street is a designated Local Street that travels in the east-west direction and is located adjacent to the southern boundary of the Project Site. It generally provides two travel lanes, one lane in each direction. Unmetered parking is generally provided on both sides of the street in the vicinity of the Project Site. The approximate paved width of Romaine Street is 30 feet in the vicinity of the Project Site.

- Seward Street—Seward Street is a designated Local Street that travels in the north-south direction and is located adjacent to the western boundary of the Project Site. It generally provides two travel lanes, one lane in each direction. Unmetered parking is generally provided on the west side of the street in the vicinity of the Project Site. The approximate width of Seward Street is 30 feet in the vicinity of the Project Site.

(3) Regional Transportation System

(a) *Freeways*

As discussed above, primary regional access to the Project area is provided by US-101 located approximately 1.5 miles east of the Project Site.

(b) *Transit System*

The Project Site is served by bus lines operated by Metro along Santa Monica Boulevard, Highland Avenue, and Vine Street. Metro Local Route 4 is located within 0.2 mile of the Project Site and runs eastbound to Los Angeles and westbound to Santa Monica via Santa Monica Boulevard, with a bus stop located northwest of the Project Site at Wilcox Avenue and Santa Monica Boulevard. In addition, Metro Local Routes 210 and 224 also operate within 0.5 mile of the Project Site with bus stops located at Vine Street & Santa Monica Boulevard and Highland Avenue & Santa Monica Boulevard, respectively. LADOT's DASH Hollywood line also operates 0.4 mile north of the Project Site. Existing transit services in the study area are shown in Figure IV.H-1 on page IV.H-12. The Project Site is not located along any streets identified in the Mobility Plan's Transit Enhanced Network.

c. Existing Project Site Conditions

The Project Site is currently developed with two one story buildings totaling 10,993 square feet, comprised of a 2,551 square foot restaurant and 8,442 square foot studio and production space, along with surface parking areas. Vehicular access to the Project Site is provided via driveways along Romaine Street and Hudson Avenue. Pedestrian access to the Project Site is located along Seward Street and Romaine Street in the form of concrete sidewalks.

d. Existing Pedestrian and Bicycle Facilities

(1) Pedestrian Facilities

The sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The sidewalks

provide connectivity to existing pedestrian crossings at intersections within the Project vicinity. Adjacent to the Project Site, approximately 5- to 10-foot-wide sidewalks are provided along Seward Street, Hudson Street, and Romaine Street. Many areas around the Project Site provide pedestrian facilities, including curb ramps on all approaches. The signalized intersection at Wilcox Avenue and Santa Monica Boulevard provides pedestrian phasing, high-visibility crosswalk striping, and ADA accessible curb ramps.

(2) Bicycle Facilities

Based on the City's 2010 Bicycle Plan, the existing bicycle system in the study area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle lanes (Class II) are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic to ensure safety. Bicycle routes (Class III) are identified as bicycle-friendly streets where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes and bicycle-friendly streets are preferably placed on collector and low volume arterial streets. Bicycle routes with shared lane markings, or "sharrows," remind bicyclists to ride farther from parked cars to prevent collisions, increase awareness of motorists that bicycles maybe in the travel lane, and show bicyclists the correct direction of travel. In the vicinity of the Project Site, Class III sharrows are provided along Wilcox Avenue. Additional sharrows are provided outside the Study Area in the vicinity of the Project along Willoughby Avenue.

e. Future Transportation Context

(1) Related Projects

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 area. A total of 16 related development projects were identified in the vicinity of the Project Site, as well as the Hollywood Community Plan Update, 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.

(2) Future Base Transportation System Improvements

(a) Future Roadway Improvements

The analysis of future conditions considered roadway improvements that were funded and reasonably expected to be implemented prior to the buildout of the Project. Any

roadway improvement that would result in changes to the physical configuration at the study intersections would be incorporated into the analysis. However, these improvements depend on the construction of the projects, which are not guaranteed to be built or may not be completed by Project buildup. Therefore, this analysis conservatively concluded that these improvements would not be implemented by 2025. Other proposed traffic/trip reduction strategies such as the proposed creation of a Hollywood Transportation Management Organization (TMO) and TDM programs for individual buildings and developments were not applied to the Future Conditions analysis.

(b) Mobility Plan 2035

In the Mobility Plan, the City identifies key corridors of mobility-enhanced networks. Specific improvements in such networks have not yet been identified, and no schedule for implementation has been made available. As such, there have been no changes to vehicular lane configurations as a result of the Mobility Plan. However, as described above in Subsection 2.c.(2), the Transportation Assessment provides a list of the corridors identified as part of the mobility-enhanced networks.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access.

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

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

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

b. Methodology

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

As discussed above, with implementation of SB 743, the updated Appendix G thresholds, and the City’s revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As described above, CEQA Guidelines threshold (a) has been updated to require an analysis of the 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 evaluates the Project’s potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section. In accordance with the TAG, a project that generally conforms with, and does not obstruct the City’s development policies and standards will generally be considered to be consistent.

(2) Vehicle Miles Traveled

(a) *VMT Impact Thresholds*

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds.⁵ The TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR’s CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under

⁵ OPR, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

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 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 Area Planning Commission (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.

Per the TAG, if a project includes less than 50,000 square feet of retail uses (including restaurants), then such retail uses are deemed to be small-scale or local-serving and are assumed to have less than significant VMT impacts.⁶ 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.⁷

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.

⁶ LADOT, *Transportation Assessment Guidelines*, July 2020, p. 2-7.

⁷ LADOT, *Transportation Assessment Guidelines*, July 2020, p. 2-7.

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

1. Suburban (Zone 1): Very low-density primarily centered around single-family homes and minimally connected street network.
2. Suburban Center (Zone 2): Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.
3. Compact Infill (Zone 3): Higher density neighborhoods that include multi-story buildings and well-connected streets.
4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network.

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

(ii) *Mixed-Use Development Methodology⁸*

As detailed in City of Los Angeles VMT Calculator Documentation, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and

⁸ For purposes of VMT, “mixed-use” refers to any development with more than a single use.

considers the following sociodemographic, land use, and built environment factors for the project area:

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

(iii) Travel Demand Forecasting

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

(iv) Population and Employment Assumptions

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

⁹ The 2020 LAUSD Developer Fee Justification Study and Trip Generation 11th Edition are now available, but City's VMT Calculator utilized the editions indicated herein.

(v) *Transportation Demand Management Measures*

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

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

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

(3) Hazardous Design Features

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

(4) Emergency Access

In consultation with the Los Angeles Fire Department (LAFD), the analysis of the Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. A determination was made pursuant to the thresholds of

significance identified above regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would implement the following project design features, which are relevant to the assessment of emergency access:

TR-PDF-1: The Project shall prepare a TDM program. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy.

The following TDM elements will be included in the Project:

- Reduced Parking Supply to provide less parking than required by the LAMC, without consideration of additional parking reduction mechanisms (i.e., Bicycle Parking Ordinance or Enterprise Zone areas, etc.);
- Parking Cash-Out: offer employees the opportunity to “cash-out” the monthly value of their currently free or subsidized parking space;
- Promotions & Marketing to educate and inform travelers about site-specific transportation options and the effects of travel choices;
- Include secure bike parking and showers to support safe and comfortable bicycle travel by providing end-of-trip amenities;
- Pedestrian network improvements within the Project Site and connecting to off-site pedestrian facilities to encourage walking.

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

- As parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;

- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking 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

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

Each of the documents listed in TAG Table 2.1-1 was reviewed for applicability to the Project, and the relevant transportation-related policies are described below, along with the Project's conformance. Although not listed in TAG Table 2.1-1, this discussion also includes a freeway safety analysis based on the City Freeway Guidance issued by LADOT in May 2020.

(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.

It further enumerates a variety of policies and programs in support of those goals. The policies and programs that are applicable to the Project are provided in Table IV.H-1 on page IV.H-25. As discussed in the Transportation Assessment, the Mobility Plan identifies key corridors in the vicinity of the Project Site as components of various “mobility-enhanced networks.” No specific improvements have been identified and there is no schedule for implementation, however, the mobility enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. As discussed below, the Project would be designed with the mobility-enhanced networks as a top priority.

As discussed above, the three streets adjacent to the Project Site are classified as Local Streets in the Mobility Plan. Consistent with the driveway location planning guidelines, vehicular access to the Project would be provided via a non-arterial street, Hudson Avenue. The driveway would be designed in accordance with the standards set forth in MPP. The Project would provide off-street parking to satisfy LAMC requirements. The Project would also retain all other existing on-street parking around Project frontage.

The Project would also enhance pedestrian access within and around the Project Site by providing a commercial plaza entrance into the Project from Romaine Street and improvements to the sidewalk landscaping and street trees within the Project’s entrance area and along the perimeter of the Project Site. Secured bicycle parking facilities within the Project Site would also be provided and accessed via the commercial lobby entrance on Romaine Street. These measures would promote active transportation modes such as biking and walking, thereby reducing the Project VMT per capita for employees compared to the average for the area. Furthermore, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveway is not proposed along a street with an existing bicycle facility.

As detailed in Table IV.H-1 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.

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

Objective, Policy, Program, or Plan^a	Analysis of Project Consistency
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.	Consistent. With development of the Project, Seward Street, Hudson Avenue, and Romaine Street along the Project frontage would be improved to provide adequate pedestrian safety. The Project would also include all dedications and corner cuts necessary to safeguard and meet the goals and long-term needs of the Mobility Plan. Further, the Project would not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveway would not be proposed along a street with an existing bicycle facility.
Policy 1.2 Complete Streets Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.	Consistent. The Project Site is located in the vicinity of several Complete Street Networks that each prioritize a specific mode with the goal of providing improved connectivity around the Project Site. The Transit-Enhanced Network (TEN) includes streets that prioritize travel for public transit riders. TEN improvements often include prioritizing bus lanes and/or providing enhanced transit amenities at existing stops. Santa Monica Boulevard north of the Project Site is identified as part of the TEN. The Bicycle Enhanced Network (BEN) and Bicycle Lane Network (BLN) includes low-stressed protected bicycle paths, lanes, and routes that prioritize bicycle safety by providing improved bicycle facilities. Santa Monica Boulevard is also identified as part of the BLN. Finally, Pedestrian-Enhanced Districts (PED) include arterial streets that could benefit from additional pedestrian amenities to improve the overall safety and attractiveness of walking connectivity. Santa Monica Boulevard west of Seward Street and east of Wilcox Avenue is identified as part of the PED. The Project would not interfere with the City's goals of the Complete Streets Network.
Chapter 2: World Class Infrastructure	
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.	Consistent. The Project provides pedestrian and bicycle access via the commercial plaza entrance on Romaine Street. This entrance is separate from the vehicular access on Hudson Avenue. Sidewalks along the east, south, and west boundaries of the Project Site provide connectivity to curb ramps at adjacent intersections. The study intersection of Wilcox Avenue and Santa Monica Boulevard east of the Project Site includes pedestrian phasing and high-visibility continental crosswalks. Thus, the Project ensures high-quality pedestrian access and provides a safe and comfortable walking environment.
Policy 2.5 Transit Network Improve the performance and reliability of existing and future bus service.	Consistent. As discussed above, the TEN includes streets that prioritize travel for public transit riders. TEN improvements often include prioritizing bus lanes and/or providing enhanced transit amenities at existing stops.

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

Objective, Policy, Program, or Plan^a	Analysis of Project Consistency
	Santa Monica Boulevard north of the Project Site is identified as part of the TEN. The Project supports the goals of the TEN.
Policy 2.6 Bicycle Networks Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities. (includes scooters, skateboards, rollerblades, etc.)	Consistent. As discussed above, the BEN/BLN includes low-stressed protected bicycle paths, lanes, and routes that prioritize bicycle safety by providing improved bicycle facilities. Santa Monica Boulevard is identified as part of the BLN. Further, the Project Site also provides 22 short-term bicycle parking spaces and 36 long-term bicycle parking spaces for all uses on-site. The Project supports the goals of the BEN/BLN.
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.	Consistent. As discussed above, the Project would provide pedestrian and bicycle access via the commercial plaza entrance on Romaine Street. This entrance is separate from the vehicular access on Hudson Avenue. Sidewalks along the east, south, and west boundaries of the Project Site would provide connectivity to curb ramps at adjacent intersections. Additionally, the Project would provide 22 short-term bicycle parking spaces and 36 long-term bicycle parking spaces for all uses on-site, and Santa Monica Boulevard north of the Project Site is identified as part of the BEN. Transit bus service is provided in and around the Study Area by Metro Local and Metro Rapid bus lines. As such, the Project recognizes all moves of travel as integral to the City of Los Angeles' (City) transportation system and would encourage multi-modal access to the Project Site.
Policy 3.2 People with Disabilities Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	Consistent. The Project's vehicular and pedestrian entrances would be designed in accordance with LADOT standards and would comply with ADA requirements. The Project design would also be in compliance with all ADA requirements and would provide direct connections to pedestrian amenities at nearby intersections.
Policy 3.8 Bicycle Parking Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	Consistent. As discussed above, the Project would provide 22 short-term bicycle parking spaces and 36 long-term bicycle parking spaces for all uses on-site, and Santa Monica Boulevard north of the Project Site are identified as part of the BEN.
Chapter 4: Collaboration, Communication, & Informed Choices	
Policy 4.8 Transportation Demand Management Strategies Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	Consistent. The Project would incorporate several design features, which include TDM measures as defined by the VMT Calculator to reduce the number of single occupancy vehicle trips to the Project Site, including the following: <ul style="list-style-type: none"> • Reduced parking supply—provide 310 spaces of base LAMC requirement of 403 spaces • Parking cash-out—30% employee eligible

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

Objective, Policy, Program, or Plan^a	Analysis of Project Consistency
	<ul style="list-style-type: none"> • Promotions & marketing—100% employee eligible • Include bike parking per LAMC, including short-term and long-term parking facilities • Include secure bike parking and showers • Pedestrian network improvements, within the Project site and connecting off-site
Policy 4.13 Parking and Land Use Management <p>Balance on-street and off-street parking supply with other transportation and land use objectives.</p>	Consistent. The Project would provide sufficient off-street parking to accommodate Project parking demand. The Project would also retain the existing on-street parking around Project frontage.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.1 Sustainable Transportation <p>Encourage the development of a sustainable transportation system that promotes environmental and public health.</p>	Consistent. As part of the Project, secured bicycle parking facilities and pedestrian connections within the Project Site and connecting to off-site pedestrian facilities would be provided. This would promote active transportation modes such as biking and walking. Additionally, transit bus service is provided in the vicinity of the Project Site by Metro Local and Metro Rapid bus lines, providing residents, employees, and visitors to the Project with public transportation alternatives.
Policy 5.2 Vehicle Miles Traveled (VMT) <p>Support ways to reduce vehicle miles traveled (VMT) per capita.</p>	Consistent. The Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as discussed further under Threshold (b) below. Additionally, the Project would incorporate several design features, which include TDM measures as defined by the VMT Calculator to reduce the number of single occupancy vehicle trips to the Project Site, including the following: <ul style="list-style-type: none"> • Reduced parking supply—provide 310 spaces of base LAMC requirement of 403 spaces • Promotions & marketing—100% employee eligible • Include bike parking per LAMC, including short-term and long-term parking facilities • Include secure bike parking and showers • Pedestrian network improvements, within the Project site and connecting off-site
<hr/> <p>^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).</p> <p>Source: Gibson Transportation, July 2021. Refer to Appendix J of this Draft EIR.</p>	

(b) *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-29. In summary, the Project prioritizes safety and access for all individuals utilizing the Site by complying with all ADA requirements and providing direct connections to pedestrian amenities. Further, the Project supports healthy lifestyles by locating jobs near transit (Metro and LADOT Local Bus Lines), providing bicycle amenities, and enhancing the pedestrian environment by providing shade trees and landscaping for a more comfortable pedestrian environment. The Project would promote healthy living as a pedestrian- and transit-oriented mixed-use development where active travel modes are encouraged.

Thus, the Project would not conflict with the goals of Plan for a Healthy Los Angeles.

(c) *Hollywood Community Plan*

A detailed analysis of the Project's consistency with the Hollywood Community Plan is provided in Table IV.H-3 on page IV.H-31. The Project would provide employment opportunities with the proposal of new office, restaurant, and retail land uses to further the development of Hollywood as a major center of employment and retail services. The Project is consistent with the circulation standards and criteria of the Hollywood Community Plan as the transportation system within the vicinity of the Project Site would adequately serve the traffic generated by the Project without major congestion. In addition, the Project would implement TDM strategies to further reduce the number of single-occupancy vehicle trips generated by the Project. Thus, the Project would promote and encourage development standards in line with the goals and objectives of the Hollywood Community Plan.

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

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. The Project's bicycle parking requirement is 21 short-term and 34 long-term spaces. The Project would provide 58 bicycle parking spaces (including 36 long-term and 22 short-term spaces), which would meet the LAMC requirements for on-site bicycle parking supply.

(e) *LAMC Section 12.26J (TDM Ordinance)*

LAMC Section 12.26J establishes TDM requirements for new non-residential floor area. Key requirements of the TDM Ordinance include providing carpool/vanpool loading areas, walkways between buildings and public sidewalks, and improving adjacent bus stops to the satisfaction of local transit agencies. Pursuant to the requirements of the TDM Ordinance, the Project design would implement the following TDM strategies:

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

Objective, Policy, Program, or Plan^a	Analysis of Project Consistency
Chapter 1: Los Angeles, a Leader in Health and Equity	
<p>Policy 1.5 Plan for Health</p> <p>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.</p>	<p>Consistent. The Project would enhance pedestrian access within and around the Project Site by providing access via the commercial plaza entrance on Romaine Street. This entrance is separate from the vehicular access on Hudson Avenue. Sidewalks along the east, south, and west boundaries of the Project Site provide connectivity to curb ramps at adjacent intersections. The intersection of Wilcox Avenue and Santa Monica Boulevard east of the Project Site includes pedestrian phasing and high-visibility continental crosswalks. Sidewalk landscaping and street trees would be implemented within the Project's entrance area and along the perimeters of the Project Site.</p> <p>Further, the Project would provide infrastructure and services to encourage bicycling for residents, employees, and visitors to the Project Site. There would be 22 short-term and 36 long-term bicycle parking spaces provided by the Project. As such, it would encourage the use of active travel modes and thereby promote healthy living.</p>
Chapter 2: A City Built for Health	
<p>Policy 2.8 Basic Amenities</p> <p>Promote increased access to basic amenities, which include public restrooms and free drinking water in public spaces, to support active living and access to health-promoting resources.</p>	<p>Consistent. The Project would provide open space to support active living. The commercial plaza entrance provides an open, accessible area for outdoor rest and recreation, and users of the Project Site will have access to basic amenities including restrooms and drinking water.</p>
Chapter 5: An Environment Where Life Thrives	
<p>Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction</p> <p>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.</p>	<p>Consistent. The Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as discussed further under Threshold (b) below. Additionally, the Project would incorporate several design features, which include TDM measures as defined by the VMT Calculator to reduce the number of single occupancy vehicle trips to the Project Site, including the following:</p> <ul style="list-style-type: none"> • Reduced parking supply—provide 310 spaces of base LAMC requirement of 403 spaces • Parking cash-out—30% employee eligible • Promotions & marketing—100% employee eligible • Include bike parking per LAMC, including short-term and long-term parking facilities • Include secure bike parking and showers • Pedestrian network improvements, within the Project site and connecting off-site

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

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
	VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.

^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: Gibson Transportation, July 2021. Refer to Appendix J of this Draft EIR.

- Bicycle parking
- Bicycle amenities
- Pedestrian network improvements

Details of the Project's TDM program are provided in Project Design Feature TR-PDF-1. The Project would therefore be consistent with the current TDM Ordinance.

(f) LAMC Section 12.37 (Waivers of Dedications and Improvements)

LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-ROW standards consistent with the street designations of the Mobility Plan if the site abuts an Arterial or Collector street. None of the streets adjacent to the Project Site are designated Arterial or Collector streets. All of the adjacent streets are classified as Local streets in accordance with the Mobility Plan 2035. Therefore, LAMC Section 12.37 does not apply to the Project. The Project will satisfy or request relief from any dedication and improvement requirements necessary to meet City standards through a T Classification Condition under LAMC Section 12.32-G.1.

(g) 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 City has identified a number of streets as part of the High Injury Network where City projects will be targeted. As noted above, none of the streets adjacent to the Project Site have been identified as part of the High Injury Network. Nonetheless, the Project improvements to the pedestrian environment would not preclude future Vision Zero Safety Improvements by the City. Thus, the Project would not conflict with Vision Zero.

Table IV.H-3
Project Consistency With Hollywood Community Plan

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
Objective 1: To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	Consistent. The Project would provide office, restaurant, and retail land uses, contributing to the development of Hollywood as a major center of employment and retail services.
Objective 6: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage and the expansion and improvement of public transportation service.	Consistent. Transit bus service is provided in the vicinity of the Project Site by Metro Local and Metro Rapid bus lines. The Project Site's close proximity to transit would allow employees and visitors to utilize such services while traveling to and from the Project Site.

^a Objectives, Policies, Programs, or Plans based on information provided in the Hollywood Community Plan, Los Angeles Department of City Planning, 1988.

Source: Gibson Transportation, July 2021. Refer to Appendix J of this Draft EIR.

(h) Streetscape Plans

There are no streetscape plans adjacent to the Project Site and, therefore, streetscape plans do not apply to the Project.

(i) Citywide Design Guidelines

The Pedestrian-First Design approach of the Citywide Design Guidelines (LADCP Urban Design Studio, October 2019) identifies design strategies that “create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promoted healthy living, increases economic activity at the street level, enables social intersection, creates equitable and accessible public spaces, and improves public safety.”

The Pedestrian-First Design guidelines are as follows:

- Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

A detailed analysis of the Project's consistency with the guidelines of the Pedestrian-First Design approach is provided in Table IV.H-4 on page IV.H-33. The Project design includes accessible sidewalks, access to nearby pedestrian amenities, and a vehicular access driveway designed in accordance with the City's design considerations. The Project would implement landscaping and street trees uniformly within the sidewalk to provide adequate shade, as well as a more comfortable environment for pedestrians. Further, the orientation of the Project, including an open, outdoor commercial plaza along Romaine Street, would ensure that the Project actively engages with the street and its surrounding uses. Thus, the Project design includes pedestrian facilities and amenities to provide a more comfortable and engaging environment for pedestrians aligning with the Pedestrian-First Design approach.

(j) Freeway Safety Analysis

Based on the Project's trip generation estimates and traffic distribution pattern detailed in Chapter 3 of the Transportation Assessment, which was reviewed and approved by LADOT as part of the Project's MOU, the Project would not add 25 or more peak hour trips to any freeway off-ramp. Therefore, no freeway off-ramp analysis is required, and the Project satisfies the City requirements for a CEQA safety analysis of Caltrans facilities.

(k) Conclusion

As discussed above, and in Table IV.H-1, Table IV.H-2, Table IV.H-3, and Table IV.H-4 on pages IV.H-25, IV.H-29, IV.H-31, and IV.H-33, respectively, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

Table IV.H-4
Project Consistency with Citywide Design Guidelines

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
Pedestrian-First Design	
<u>Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all</u>	<p>Consistent. The Project design includes accessible sidewalks, access to nearby pedestrian amenities, and a vehicular access driveway designed in accordance with the City's design considerations. The Project would implement landscaping and street trees uniformly within the sidewalk to provide adequate shade, as well as a more comfortable environment for pedestrians. Further, the orientation of the Project, including an open, outdoor commercial plaza along Romaine Street would ensure that the Project actively engages with the street and its surrounding uses.</p>
<u>Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience</u>	
Design to avoid pedestrian and vehicular conflicts and to create an inviting and comfortable public right-of-way. A pleasant and welcoming public realm reinforces walkability and improves the quality of life for users.	
<u>Guideline 3: Design projects to actively engage with streets and public space and maintain human scale</u>	
New projects should be designed to contribute to a vibrant and attractive public realm that promotes a sense of civic pride. Better connections within the built environment contribute to a livable and accessible city and a healthier public realm.	

^a Objectives, Policies, Programs, or Plans based on information provided in the Citywide Design Guidelines (Los Angeles Department of City Planning, 2019).

Source: Gibson Transportation, July 2021. Refer to Appendix F of this Draft EIR.

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

(1) Impact Analysis

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's land uses and their respective sizes as the primary input. As noted above, because the Project's restaurant and retail component is less than 50,000 square feet and considered local serving, the retail and restaurant component would not generate regional VMT, and a no impact

determination can be made.¹⁰ However, the restaurant and retail components are part of the larger non-residential Project, and therefore were conservatively considered in the Project VMT analysis. Based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 0
- Total Employees: 598
- APC: Central
- TBZ: Compact Infill
- Maximum VMT Reduction: 40 percent

As shown in Table IV.H-5 on page IV.H-35, using these assumptions, the Project is estimated to result in 1,542 daily vehicle trips and a total daily VMT of 11,717 and a daily work VMT of 4,509, resulting in a daily work VMT per employee of 7.5, which is below the threshold for the Central APC of 7.6 VMT per employee. Thus, the Project's office component would not result in a significant impact with respect to work VMT as estimated by the VMT calculator. The Project does not include any residential uses and, therefore, would not result in a significant household VMT impact.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

Threshold (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)?

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 Project Site is located in a highly urbanized area developed with roadways and infrastructure. All access

¹⁰ LADOT, *Transportation Assessment Guidelines*, July 2020, p. 2-7.

Table IV.H-5
VMT Analysis Summary

Project Information—Option A	
Land Use	Size
Office General Office	136,200 sf
Retail General Retail	2,200 sf
Retail High-Turnover Sit-Down Restaurant	12,200 sf
Project Analysis^a	
Resident Population ^b	0
Employee Population ^c	598
Project Area Planning Commission	Central
Travel Behavior Zone (TBZ)	Compact Infill
Maximum Allowable VMT Reduction ^d	40%
VMT Analysis^e	
Daily Vehicle Trips	1,542
Daily VMT	11,717
Household VMT per Capita ^f	N/A
Impact Threshold	6.0
Significant Impact	—
Work VMT per Employee ^g	7.5
Impact Threshold	7.6
Significant Impact	No

^a Project Analysis based on the City of Los Angeles VMT Calculator Version 1.3 (July 2020).
^b Total Population and Household VMT do not apply to the land uses of this Project.
^c Total Employment estimate is base don the following employment factors:
 General Office: 4.0/1,000 sf
 General Retail: 2.0/1,000 sf
 High-Turnover (Sit-Down) Restaurant: 4.0/1,000 sf
 The employment factors are based on employee data from the Los Angeles Unified School District, 2012 SANDAG Activity Based Model, ITE trip generation rates, US Department of Energy, and other modeling resources.
^d The maximum allowable VMT reduction is based on the Project's designated TBZ as determined from Transportation Demand Management Strategies in LA VMT Calculator (LADOT, November 2019) and Quantifying Greenhouse Gas Mitigation Measures (California Air Pollution Control Officers Association, 2010).
^e Project design features include:
 1. Reduce parking supply—Provide 310 spaces of base LAMC requirement of 403 spaces
 2. Parking cash-out—30% employees eligible
 3. Promotions and marketing—100% employees eligible
 4. Include bike parking per LAMC
 5. Include secure bike parking and showers
 6. Pedestrian network improvements within project and connecting off-site
^f Based on home-based production trips only.
^g Based on home-based work attraction trips only.
 Source: Gibson Transportation, July 2021. Refer to Appendix F of this Draft EIR.

and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City Department of

Building Safety, LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature. Vehicular access to the Project Site would be provided via a two-way driveway along Hudson Avenue that would provide access to the building's ground-level, above-grade, and subterranean parking. As such, the number of curb cuts on the Project Site would be reduced from five to one. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial and office uses already present in the surrounding area. **Thus, impacts related to hazardous geometric design features would be less than significant, and no mitigation measures are required.**

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, 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, the Project would implement a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-2 which would provide routing around any parking lane and or sidewalk closures, ensure access to surrounding land uses, provide parking for construction workers, and coordinate with the City and emergency service providers to ensure adequate access to the Project Site and neighboring businesses and residents. 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, the Project would not result in inadequate emergency access. **Impacts related to emergency access would be less than significant, and no mitigation measures are required.**

e. Cumulative Impacts

(1) Impact Analysis

- (a) *Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System*
 - (i) *Mobility Plan 2035*

Implementation of the Project, together with the Related Projects, would not create inconsistencies with the Mobility Plan. 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. Therefore, the Project, together with the Related Projects, would not result in cumulative impacts with respect to consistency with applicable policies identified in the Mobility Plan.

(ii) Plan for a Healthy Los Angeles

Implementation of the Project, together with the Related Projects, would not create inconsistencies with Plan for a Healthy Los Angeles. The related projects primarily propose mixed use developments that include high-density housing (including some affordable housing), office, and commercial uses in an area well served by public transit, thereby reducing dependence on automobiles, encouraging more active travel modes, and reducing GHG emissions. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with applicable policies identified in Plan for a Healthy Los Angeles.

(iii) Hollywood Community Plan

Implementation of the Project, together with the Related Projects, would not create inconsistencies with Hollywood Community Plan. The related projects propose high-density housing (including some affordable housing), office, and commercial uses in an area with good transit connectivity and, thereby, would be consistent with the circulation standards and criteria of the Hollywood Community Plan. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with applicable policies identified in Hollywood Community Plan.

(iii) LAMC 12.21.A.16 (Bicycle Parking)

Similar to the Project, each of the related projects would be individually responsible for providing on-site bicycle parking based on LAMC requirements. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with LAMC Section 12.21.A.16.

(iv) LAMC 12.26J (TDM Ordinance)

Similar to the Project, each of the related projects would be individually responsible for implementing any required measures under the TDM Ordinance. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with the TDM Ordinance.

(v) *LAMC 12.37 (Waivers of Dedication and Improvements)*

As previously noted, none of the streets adjacent to the Project Site are designated Arterial or Collector Streets. However, similar to the Project, each of the related projects would include all dedications and corner cuts necessary to meet City Standards where a Waiver of Dedication and Improvement has not been requested. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with LAMC Section 12.37.

(vi) *Vision Zero/Vision Zero Corridor Plans*

As previously noted, none of the streets adjacent to the Project Site have been identified as part of the High Injury Network. Nonetheless, similar to the Project, related project improvements to the pedestrian environment would not preclude future Vision Zero Safety Improvements by the City. The related projects would not interfere with implementation of any proposed or potential future Vision Zero improvements, and therefore the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with Vision Zero.

(vii) *Citywide Design Guidelines*

Similar to the Project, the related projects are also consistent with the Citywide Design Guidelines by providing additional high-density housing (including some affordable housing) and office uses in an area with good transit connectivity, thereby reducing dependence on automobiles and encouraging pedestrian travel modes and the increased social interaction that provides. Similar to the Project, it is likely that the related projects would include pedestrian facilities and amenities to provide a more comfortable and engaging environment for pedestrians aligning with the Pedestrian-First approach. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with the Citywide Design Guidelines.

(viii) *Conclusion*

Based on the above, Project impacts with respect to conflicts with plans would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) *Vehicle Miles Traveled*

A development project would have a cumulative VMT impact if it were deemed inconsistent with SCAG's RTP/SCS, the regional plan to reach state air quality and greenhouse gas reduction targets. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be

in alignment with the RTP/SCS, and therefore would also have no cumulative VMT impact. Additionally, the Project is in an infill location with convenient access to public transit and opportunities for walking and biking 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 retail and restaurant uses will be local-serving and are therefore not considered for purposes of identifying significant work VMT impacts, as those trips are assumed to have a negligible effect on regional VMT. When considered with the related projects, most of which propose additional residential development near the Project Site, the Project would help to provide local retail and dining options to the new residents and office employees in the area.

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

(c) Hazardous Geometric Design Features

According to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts. However, there are no related projects with access points along the same blocks as the Project. Furthermore, as discussed above, the Project would not result in a significant impact associated with hazardous geometric design features. **Therefore, Project impacts with respect to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(d) Emergency Access

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed

throughout the study area and would not be concentrated to a specific location. Also, as previously discussed, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. **Therefore, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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