IV. Environmental Impact Analysis
J. Transportation

1. Introduction

This section analyzes the Project's potential impacts on transportation. The analysis is primarily based on the *6000 Hollywood Boulevard Development Project Transportation Assessment* (Transportation Assessment)[1] prepared by Fehr & Peers, and included in its entirety in Appendix J of this Draft EIR. The analysis of vehicle miles traveled (VMT) is based on the Transportation Assessment, which was prepared pursuant to LADOT's Transportation Assessment Guidelines (TAG). The TAG was developed in July 2020 and updated in August 2022 to establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) Guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment was also prepared pursuant to a Memorandum of Understanding (MOU) reviewed and approved by LADOT in November 2022 and included as Appendix A of the Transportation Assessment. The Transportation Assessment was approved by LADOT on August 9, 2024. A copy of LADOT's Assessment Letter for the Transportation Assessment is included as Appendix J 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 that apply to the Project. As described below, these plans, guidelines, and laws include:

- Americans with Disabilities Act of 1990 (ADA)
- Complete Streets Act

[1] *Fehr & Peers, 6000 Hollywood Boulevard Development Project Transportation Assessment, Los Angeles, California, October 2024.*

- Assembly Bill (AB) 32 and Senate Bill (SB) 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)
- City of Los Angeles Mobility Plan 2035
- Hollywood Community Plan
- Los Angeles Municipal Code (LAMC)
- LADOT Transportation Assessment Guidelines (TAG)
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- LADOT Interim Guidance for Freeway Safety
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles

(1) Federal

(a) Americans with Disabilities Act of 1990

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

(2) State

(a) Complete Streets Act

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

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

(b) Assembly Bill 32 and Senate Bill 375

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

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

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

Fourth, SB 375 provides CEQA streamlining incentives for certain 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 specified density requirements; and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

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

(c) California Vehicle Code

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

(d) Senate Bill 743

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

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

Based on these changes, on July 30, 2019, the City of Los Angeles City Council adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's CEQA transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project's transportation impacts under CEQA in accordance with SB 743, in July 2019 with updates in July 2020 and August 2022.

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop[2] or a stop along an existing high-quality transit corridor[3] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles

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

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

VMT Calculator Version 1.4 (June 2023) (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 current version of the TAG.

(3) Regional

(a) Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans, including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and a portion of the South Coast Air Quality management plans.

In compliance with SB 375, on April 4, 2024, the SCAG Regional Council adopted 2024 Connect SoCal, which is SCAG's 2024–2050 Regional Transportation Plan/ Sustainable Communities Strategy (2024–2050 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The goals for the 2024–2050 RTP/SCS address mobility, communities, environment, and economy. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality, and improve the region's long-term economic viability through more than $751 billion in transportation investments and a more sustainable regional development pattern. The 2024–2050 RTP/SCS also 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 SCAG region.

As part of the 2024–2050 RTP/SCS, SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the 2024–2050 RTP/SCS's vision and achievement of SCAG's goals. These policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. These policies address Priority Development Areas (PDAs), housing the region, 15-minute communities, equitable engagement and decision-making, sustainable development, air quality, clean transportation, natural and

agricultural lands preservation, and climate resilience. SCAG has identified development within PDAs, providing sufficient housing opportunities, developing 15-minute communities, and fostering equitable decision-making as the framework for implementing the Regional Planning Policies. The 2024–2050 RTP/SCS defines PDAs as areas within the SCAG region where future growth can be located to help the region reach 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool to facilitate plan development and analysis, and are used for different purposes, such as growth visioning, performance measurement or grant applications. As a general principle, development in overlapping PDAs indicates a greater alignment with the goals of the 2024–2050 RTP/SCS. These PDAs are comprised of Neighborhood Mobility Areas (NMAs), Livable Corridors,[4] TPAs,[5] and Spheres of Influence. SCAG also recognizes that many Livable Corridors are also High Quality Transportation Corridors (HQTCs).[6]

The Project's consistency with the relevant policies of the 2024–2050 RTP/SCS is provided further below.

(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.[7] The Mobility Plan incorporates "complete streets"

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[4] *SCAG defines Livable Corridors as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. Growth at strategic nodes along key corridors, many of which are HQTCs, will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past plans like HQTCs and input from local jurisdictions during the Local Data Exchange process. Additionally, this strategy integrates certain transit improvements, including Bus Rapid Transit (BRT), other features improving bus performance and user experience, and certain active transportation improvements to support safe bicycling and walking.*

[5] *In accordance with CEQA Guidelines Section 21099(a)(7), a transit priority area is an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.*

[6] *A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The City of Los Angeles defines peak hours as between 6:00 a.m. and 9:00 a.m. and between 3:00 P.M. and 7:00 P.M.*

[7] *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.*

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

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

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

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

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

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

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

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

(b) Hollywood Community Plan

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

The Project Site is located within the Hollywood Community Plan area. The Hollywood Community Plan, adopted on December 13, 1988, includes the following

transportation-related objectives and standards/criteria and identifies the following planned circulation improvements:

- Objectives:
  - Objective 6: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.
- Standards/Criteria:
  a) Arterials and local streets shown on this Plan shall be developed in accordance with standards and criteria contained in the Mobility Plan 2035 and the City's Standard Street Dimensions. Design characteristics which give street identity such as curves, changes in direction and topographical differences, should be emphasized by street trees and planted median strips and by paving. Streets, arterials and freeways, when developed, should be designed and improved in harmony with adjacent development and to facilitate driver and passenger orientation.

  b) The full residential, commercial and industrial densities and intensities proposed by the Plan are predicated upon the development of the designated Boulevards and Avenues. No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, Boulevards and Avenues, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated. Adequate streets improvements shall be assured prior to the approval of zoning permitting intensification of land use in order to avoid congestion and assure proper development. The Plan recognizes that within the designated Center Study Areas of Hollywood innovative parking programs should be instituted to accommodate these Centers' parking needs through creation of more available parking capacity and more efficient use of parking facilities.
- Recommended Circulation Improvements:
  a) Continued development of the freeway, arterial, and street system in conformance with existing and future adopted programs. This should include participation of the City in a regional study focusing on Route 2 capacity increases.

  b) Continued planning of and improvements to the public transportation system for the community, including people-mover systems in high intensity areas as well as the proposed Los Angeles County Metropolitan Transportation Authority (Metro) Rail System.

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

On May 3, 2023, the Los Angeles City Council approved the Hollywood Community Plan Update. Following adoption of the updated Hollywood Community Plan, the implementing ordinances will be reviewed and finalized by the City Attorney to ensure clarity of regulations and consistency with State law. After this process is complete, the City Council will consider and vote on the implementing ordinances of the Hollywood Community Plan Update, which if adopted, will then go into effect. Until that time, the 1988 Hollywood Community Plan is still the operative land use document for the Project Site.

(c) Hollywood Redevelopment Plan

The Project Site is located within the 2003 Hollywood Redevelopment Plan area.[8] The Hollywood Redevelopment Plan sets forth the re-planning, redesign and rehabilitation and/or development areas within the Hollywood Redevelopment Plan area that are stagnant or improperly utilized and could not be accomplished by private enterprise acting alone, without public participation and assistance. The Redevelopment Plan includes a goal (Goal 12) to support and encourage a circulation system that will improve the quality of life in Hollywood. In addition, transportation-related guidelines, including circulation, parking, and loading facilities, are described in Section 518 of the Hollywood Redevelopment Plan. The Hollywood Redevelopment Plan will be amended as part of the Hollywood Community Plan Update.

(d) Los Angeles Municipal Code

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

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

[8] *On December 29, 2011, the California Supreme Court issued its decision in the California Redevelopment Association v. Matosantos case, which involved challenging the constitutionality of ABX1 26, the bill that dissolved all redevelopment agencies in California. The decision upheld ABX1 26, which, therefore, led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The dissolution of the agencies became effective in February 2012. ABX1 26, however, did not dissolve adopted redevelopment plans. Therefore, the Hollywood Redevelopment Plan and its requirements for development within the Hollywood Redevelopment Project Area (Redevelopment Area) are still in effect.*

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

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

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

(e) LADOT Transportation Assessment Guidelines

As discussed above, pursuant to CEQA Guidelines Section 15064.3 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 updated the TAG in August 2022. 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 has 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.[9]

[9] *LADOT, Transportation Assessment Guidelines, August 2022.*

(f) LADOT Manual of Policies and Procedures Section 321

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

(g) Vision Zero

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

(h) Citywide Design Guidelines

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

(i) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[10] Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

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

b. Existing Conditions

(1) Existing Street System

The Project's transportation study area (Study Area) includes a geographic area covering an approximately 0.25-mile radius around the Project Site identified in consultation with LADOT in accordance with the TAG. The existing street system in the transportation analysis 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.

(a) Freeways

As described in the Transportation Assessment, primary regional access to the Project Site is provided by the Hollywood Freeway (US-101), which is accessible approximately 900 feet north and 900 feet east of the Project Site and provides connections both within the City of Los Angeles and throughout the State of California. US-101 runs in a northwest-southeast direction, extending from the East Los Angeles Interchange through Hollywood, the San Fernando Valley, and beyond. In the vicinity of the Project Site, the Hollywood Freeway provides four lanes in each direction for a total of eight lanes. Access is provided via interchanges at Highland Avenue, Cahuenga Boulevard, Vine Street, Gower Street, Hollywood Boulevard, and Sunset Boulevard.

(b) Streets

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

- Sunset Boulevard is a designated Avenue I and travels in an east-west direction approximately 0.16 miles south of the Project Site. It generally provides two through lanes in each direction. Parking is permitted on both sides of the street during off-peak periods; however, parking on Sunset Boulevard is restricted during peak periods so that additional lanes may be provided, changing the number of lanes from two to three. Left-turn channelization is provided at most intersections. Sunset Boulevard is also included in the HIN, BEN (proposed Tier 3 Bicycle Lane), VEN, and PED in the Mobility Plan.

- Hollywood Boulevard is a designated Avenue I and travels in an east-west direction directly north of the Project Site. Hollywood Boulevard provides two through lanes in each direction with limited parking provided on both sides of the street. Left-turn channelization is provided at most intersections. Hollywood Boulevard is also included in the HIN, BEN, TEN, and PED in the Mobility Plan.

- Franklin Avenue is a designated Modified Avenue II and travels in an east-west direction approximately 0.25 mile north of the Project Site. Franklin Avenue provides two through lanes in each direction with limited parking on both sides of the street. Left-turn channelization is provided at some intersections. Franklin Avenue is also included in the HIN, NEN, and PED in the Mobility Plan.

- Vine Street is a designated Avenue II and travels in a north-south direction approximately 0.28 miles west of the Project Site. Vine Street provides two through lanes in each direction with parking on both sides of the street. Vine Street includes a Class III Sharrowed Bicycle Route.[11] Vine Street is also included in the HIN, BEN, and PED in the Mobility Plan.

- Gower Street is a designated Modified Avenue III and travels in a north-south direction approximately 115 feet west of the Project Site. Gower Street provides one through lane in each direction south of Sunset Boulevard; three through lanes, one travels south and two north, between Sunset Boulevard and Hollywood Boulevard; and two through lanes in each direction north of Hollywood Boulevard. Limited parking is available on both sides of the street. Left-turn channelization is provided at most intersections. Gower Street is part of the PED in the Mobility Plan.

- Bronson Avenue is a designated Modified Avenue III and travels in a north-south direction approximately 280 feet east of the Project Site. Bronson Avenue provides two travel lanes, one in each direction, with left-turn lanes at intersections. Parking is generally available on both sides of the street. Bronson Avenue is part of the NEN and PED in the Mobility Plan.

- Wilton Place is a designated Modified Avenue III and travels in the north-south direction approximately 0.3 mile east of the Project Site. Wilton Place provides two through lanes in each direction south of Harold Way; three through lanes, one travels south and two north, between Harold Way and Hollywood Boulevard; and one through lane in each direction north of Hollywood Boulevard. Parking is available on both sides of the street with east side parking restricted during peak hours south of Hollywood Boulevard. Wilton Place is part of the HIN, BEN, and NEN in the Mobility Plan 2035.

- Carlton Way is a designated Standard Local Street and travels in an east-west direction south of the Project Site. Carlton Way provides two through lanes in each direction. Parking is available on both sides of the street. Carlton Way is part of the NEN in the Mobility Plan 2035 east of Bronson Avenue.

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[11] *Shared Lane Markings (SLMs) or "sharrows" are road markings used to indicate a shared lane environment for bicycles and automobiles. National Association of City Transportation Officials, Shared Lane Markings, https://nacto.org/publication/urban-bikeway-design-guide/bikeway-signing-marking/shared-lane-markings/, accessed January 5, 2023.*

(2) Public Transit Service

The Study Area is well-served by a variety of public transit options operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT Downtown Area Shuttle (DASH), including local and regional bus lines and the Metro rail system. The Metro B Line Hollywood/Vine Station is located approximately one-quarter mile west of the Project Site. The following provides a brief description of the public transit facilities providing service in the vicinity of the Project Site:

- Metro Local 2 is a local line that travels from Downtown Los Angeles to Westwood via Sunset Boulevard, with average headways of 7 to 10 minutes during peak hours. It provides service to Hollywood, Beverly Hills, and Brentwood. This line travels along Sunset Boulevard in the vicinity of the Project Site and stops at Gower Street south of the Project Site.

- Metro Local 180 is a local line that travels from Hollywood to Pasadena via Los Feliz Boulevard and Colorado Boulevard, with average headways of 12 minutes during peak hours. It provides service to Pasadena, Glendale, and Hollywood. This line travels along Hollywood Boulevard in the vicinity of the Project Site and stops at Bronson Avenue east of the Project Site.

- Metro Local 207 is a local line that travels from Athens to Hollywood via Western Avenue, with average headways of 6 to 10 minutes during peak hours. This line provides service to Hollywood and Athens and travels along Hollywood Boulevard, Gower Street, and Franklin Avenue near the Project Site.

- Metro Local 217 is a local line that travels from the Hollywood/Vine Station to the La Cienega Station, with average headways of 10 to 13 minutes during peak hours. This line provides service to Hollywood and travels along Hollywood Boulevard in the vicinity of the Project Site and stops at Gower Street west of the Project Site.

- Metro B Line is a subway line that travels from Union Station/Downtown Los Angeles to North Hollywood, with average headways of 15 minutes during peak hours. It provides service to Westlake, Koreatown, and Hollywood and stops at the Hollywood/Vine Station, which is located approximately 0.25 mile west of the Project Site.

- DASH Hollywood route is a local line that circulates from Hollywood, with average headways of 30 minutes during the weekday peak hours. It travels along Hollywood Boulevard, Vine Street, Avenue, and Sunset Boulevard in the vicinity of the Project Site and provides a stop at Hollywood Boulevard and Vine Street, west of the Project Site.

- DASH Hollywood/Wilshire route is a local line that circulates from Hollywood to the Wiltern Theater with average headways of 25 minutes during peak hours. It travels along Sunset Boulevard and Gower Street in the vicinity of the Project Site.

(3) Existing Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

Based on the Mobility Plan, Sunset Boulevard, Hollywood Boulevard, Franklin Avenue, Vine Street, Gower Street, and Bronson Avenue are part of the City's PED. As described in the Transportation Assessment, the Study Area generally has a mature network of pedestrian facilities, including sidewalks and pedestrian safety features. Approximately 4- to 20-foot sidewalks are provided throughout the Study Area. The existing sidewalk widths along Hollywood Boulevard, Carlton Way, Gower Street, and Bronson Avenue are 8 feet and 20 inches, 5 feet and 9 inches, 9 feet and 12 inches, and 5 feet and 11 inches, respectively.

(b) Bicycle Facilities

Existing bicycle facilities in the Study Area are mainly comprised of Class III sharrowed routes, including on Franklin Avenue, Yucca Street, Selma Avenue, Fountain Avenue, and Vine Street.

(4) High-Injury Network Facilities

Vision Zero is a traffic safety policy that promotes strategies to eliminate transportation-related collisions that result in severe injury or death. As indicated previously, Vision Zero has identified the HIN, a network of streets included based on collision data from the last five years, where strategic investments by LADOT will have the biggest impact in reducing death and severe injury. As indicated in the Transportation Assessment, streets identified in the HIN in the Study Area include portions of Franklin Avenue, Yucca Street, Hollywood Boulevard, Selma Avenue, Sunset Boulevard, Wilton Place, and Vine Street.

(5) Existing Project Site Conditions

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied primarily by an automotive dealership for Toyota that includes a showroom, parts storage structure, auto repair facility with five service bays, and surface parking. Vehicular access to the Project Site is currently provided via driveways along Hollywood Boulevard. Pedestrian access to the Hollywood Lot is currently provided along Hollywood Boulevard and pedestrian access to the Carlton Lot is currently provided along Carlton Way.

c. Future Cumulative Transportation Conditions

(1) Related Projects and Ambient Growth

In accordance with the TAG and MOU, the future conditions analysis incorporates a list of related projects 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 15 related development projects were identified in the vicinity of the Project Site, as shown in Figure III-1 and listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. These related projects are projects that are located within an approximately 0.5-mile radius from the Project Site. Some of the related projects may not be built out by 2029 (i.e., the anticipated Project buildout year), may never be built, or may be approved and built at reduced densities. Nevertheless, to provide a conservative cumulative impact analysis, the analysis assumes that the related projects will be fully built out by 2029. In accordance with the MOU, the future conditions analysis also assumes ambient growth through 2029 due to regional growth and development outside the Study Area.

Additionally, the Hollywood Community Plan update, once approved, will be a long-range plan designed to accommodate population, housing, and employment growth in Hollywood until Year 2040. Only the initial period of any such projected growth, which is accounted for in the ambient growth factor, would overlap with the Project's future baseline forecast, as the Project would be completed in Year 2029, prior to the update to the Hollywood Community Plan's horizon year.

(2) Future Base Transportation System Improvements

As provided in the Transportation Assessment, there are several transportation infrastructure projects in the Study Area, including bicycle facilities proposed in the Mobility Plan 2035, the Walk of Fame Master Plan, and two City projects on Hollywood Boulevard—the Hollywood Boulevard Safety and Mobility Project and the Access to Hollywood Project—that were publicized after the Notice of Preparation of the Project. These include the following:

- **Mobility Plan 2035.** This document identifies corridors proposed to receive improved bicycle, pedestrian, and vehicle infrastructure improvements. Proposed bicycle facilities are broken down into three tiers:
  - Tier 1 Protected Bicycle Lanes are bicycle facilities on arterial roadways with physical separation, which are equivalent to Class IV Bikeways (Separated Bikeways or Cycle Tracks) per Caltrans' guidance. Roadways with planned Tier 1 facilities in the Study Area include Hollywood Boulevard.

  - Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation, which are equivalent to Class II Bikeways (Bike Lanes). Tier 2 Bicycle Lanes are those which are more likely to be built by 2035. Roadways with planned Tier 2 facilities in the Study Area include Vine Street and Wilton Place. Planned Tier 3 facilities in the Study Area include Sunset Boulevard.

- **Walk of Fame Master Plan.** This "street for everyone" concept was introduced by Councilmember O'Farrell in 2020 as part of his HEART of Hollywood initiative. It could involve eliminating a vehicle travel lane and a parking lane in each direction on Hollywood Boulevard between La Brea Avenue and Gower Street and reallocating the ROW to accommodate: 25-foot sidewalks on each side of the street, 6-foot protected bike lanes in each direction, 11-foot travel lanes in each direction, a center turn lane, and turn pockets where needed.

  In August 2023, LADOT launched the Hollywood Boulevard Safety and Mobility Project to improve traffic safety and accessibility along Hollywood Boulevard between Gower Street and the intersection of Sunset Boulevard and Fountain Avenue. In addition, in March 2024, Council District 13 and the Bureau of Engineering announced the Access to Hollywood Project, which would implement protected bicycle lanes and other streetscape improvements on Hollywood Boulevard between La Brea Avenue and Gower Street. Phase I of the Hollywood Boulevard Safety and Mobility Project was implemented in July 2024, which included installation of a protected bike lane in each direction, maintained two travel lanes in the westbound direction, converted the eastbound direction to one travel lane, and installed on-street parking. Refer to Appendix I of the Transportation Assessment for a discussion of these proposed improvements.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access.

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018 and were subsequently adopted by the City of Los Angeles (City) on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines Update*, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The *CEQA Transportation Analysis Guidelines Update* establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG in 2019 (updated in 2020 and again in 2022). The analysis in this section and the Transportation Assessment, included as Appendix J of this Draft EIR, uses the latest version of the TAG updated by LADOT in August 2022.

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

As described above, the CEQA Guidelines Transportation Threshold (a) has been updated to require an analysis of a 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 applicable plans, programs, ordinances, and policies. 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. Specifically, an impact would not occur merely for an inconsistency with or a failure to implement, an adopted plan, program, ordinance, or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies.[12] Furthermore, under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

[12] *City of Los Angeles Department of Transportation, Transportation Assessment Guidelines, page 2-2 August 2022.*

(3) Vehicle Miles Traveled

(a) VMT Impact Thresholds

As part of evaluating a project's potential impacts under Threshold T-2.1 (VMT) of the TAG, LADOT's TAG establishes that a land use project may have a potential significant impact if the proposed project meets one or more of the following criteria:

- For residential projects, the project would generate daily household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located.
- For office projects, the project would generate daily work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC area in which it is located.
- For regional serving projects, including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT. Retail projects fewer than 50,000 square feet in size are considered local-serving and are assumed to have a negligible effect on VMT and are, therefore, not considered for the purposes of identifying significant VMT impacts. New retail uses greater than 50,000 square feet may also be considered local-serving if an applicant provides documentation that most of the vehicle trips would originate from the project area.

For mixed-use projects, the project VMT impact should be considered significant if, after taking credit for internal capture, the project's land use or land uses exceed any of the impact criteria set forth above.

Table 2.2-1 of the TAG identifies the daily household VMT per capita and daily work VMT per employee impact criteria (15 percent below the APC average) for the APCs. The Project Site is located within the Central APC and, therefore, according to Table 2.2-1 of the TAG, has a daily household VMT per capita threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6.

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 2024–2050 RTP/SCS in terms of development location, density, and intensity.

(b) VMT Analysis Methodology

The following describes the methodology by which vehicle trips and VMT are calculated in City of Los Angeles VMT Calculator Version 1.4 (VMT Calculator),[13] as detailed in the City of Los Angeles VMT Calculator Documentation.[14] LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits, which are based on the following types of one-way trips:

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

As detailed in the City of Los Angeles VMT Calculator Documentation, the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, while the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT as discussed in Appendix 1 of OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

Other types of trips generated in the VMT Calculator include Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use), Home-Based Other Attraction (trips to a non-workplace destination originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination originating from a non-residential use). These trip types are not factored into the VMT per capita and VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, those trips are factored into the calculation of total project VMT for screening purposes when determining if VMT analysis would be required.

[13] *Los Angeles Department of Transportation, City of Los Angeles VMT Calculator, Version 1.4, June 2023.*

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

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

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

The VMT Calculator determines a project's TBZ based on the latitude and longitude of the project address. Per the VMT Calculator, the Project Site is located within Compact Infill (Zone 3).

(ii) Mixed-Use Development Methodology

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

- Land use density
- Transportation network connectivity
- Availability of and proximity to transit
- Proximity to retail and other destinations
- Vehicle ownership rates
- Household size

(iii) Trip Lengths

The VMT Calculator determines a project's VMT based on the 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 a project's VMT.

(iv) Population and Employment Assumptions

The VMT Calculator contains population assumptions based on Census data and employment assumptions derived from multiple data sources, including the *2012 Developer Fee Justification Study*,[15] the San Diego Association of Governments Activity Based Model, *Trip Generation, 9th Edition*,[16] the U.S. Department of Energy, and other modeling resources. A summary of the population and employment assumptions for various land uses is provided in Table 1 of the *City of Los Angeles VMT Calculator Documentation.*

(v) TDM Strategies

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

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

[15] *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012.*

[16] *Institute of Transportation Engineers, Trip Generation Manual, 9th Edition, November 2012.*

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*.[17]

(4) Hazardous Design Features

(a) Geometric Design Feature and Incompatible Uses Analysis

Threshold T-3 of LADOT's TAG requires that a project undergo further evaluation if it proposes new driveways or new vehicle access points to the property from the public ROW or modifications along the public ROW (i.e., street dedications). Project access plans were reviewed to determine if the Project would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts, with consideration of the following factors:

1. The relative amount of pedestrian activity at project access points
2. Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site and the visibility of cars to pedestrians and bicyclists
3. The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization
4. The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts
5. The project location, or project-related changes to the public ROW, relative to proximity to the HIN or a Safe Routes to School program area
6. Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

In accordance with LADOT's TAG, impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from a project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts, as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of

[17] *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, August 2010.*

project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. Evaluation of access impacts require details relative to project land use, size, design, location of access points, etc. These impacts are typically evaluated for permanent conditions after project completion but can also be evaluated for temporary conditions during project construction. Project access can be analyzed in qualitative and/or quantitative terms and in conjunction with the review of internal site circulation and access to parking areas. All proposed site access points should be evaluated.

(b) Freeway Safety Analysis

Section 2.4.4 of the TAG outlines the methodology of assessing potential vehicle to vehicle impacts that may result in unsafe vehicle queues from freeway off-ramp facilities due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp. Freeway safety analysis is required for a development project when the project adds 25 or more morning or afternoon peak-hour trips to any freeway off-ramp. A project would result in adverse safety conditions at such a ramp if each of the following three criteria were met:

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

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

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

If a potential adverse safety condition is identified, corrective measures to be implemented to offset this potential condition could include TDM strategies to reduce a project's trip generation, investments in active transportation or transit system infrastructure to reduce a project's trip generation, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to improve safety, not induce greater VMT, and not result in secondary environmental issues.

c. Project Design Features

The Project would implement the following project design feature related to transportation.

Project Design Feature TR-PDF-1: A detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The Construction Traffic Management Plan

would formalize how construction would be carried out and 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. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following elements:

- Advance bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Scheduling workdays to begin and end prior to the morning and afternoon peak hours, respectively, to the extent feasible so as to avoid worker trips during those peak hours.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours, to reduce the effect on traffic flow on surrounding streets. Hauling shall be from 9:00 A.M. to 3:00 P.M. weekdays, and 8:00 A.M. to 4:00 P.M. on Saturdays. No hauling shall be performed on Sundays and holidays.
- Spacing of trucks to discourage a convoy effect.
- Containment of construction activity within the Project Site boundaries as approved by LADOT.
- Planning and scheduling of construction activities so as to minimize the duration of sidewalk and lane closures on Hollywood Boulevard.
- Provision of worker parking on-site or in designated off-site private parking areas and prohibition of construction-related vehicle parking on surrounding public streets, other than the streets adjacent to the Project Site.
- Provision of replacement parking for neighboring residents to make up for on-street parking temporarily lost during Project construction on Carlton Way.
- Temporary traffic controls during all construction activities adjacent to public ROWs to improve traffic flow on public roadways (e.g., flag men) and to maintain access for land uses in the vicinity of the Project Site.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as approved by LADOT, including along identified LAUSD pedestrian routes to nearby schools.

- Maintenance of a log, available on the job site, documenting the dates of hauling and the number of trips (i.e., trucks) per day.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

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

The TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: Mobility Plan; Plan for a Healthy Los Angeles; Hollywood Community Plan; Hollywood Redevelopment Plan; LAMC; Vision Zero; Streetscape Plans, and Citywide Design Guidelines. The Project's potential to conflict with these programs, plans, ordinances, and policies and with SCAG's 2024 RTP/SCS is analyzed below.

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site would be provided via three driveways along Hollywood Boulevard (referred to as the west driveway, middle driveway, and east driveway) that would provide access to the Project's ground-level, subterranean parking, and loading zone. The west driveway is proposed as a 36-foot wide full access intersection-style driveway with a traffic signal and would serve the office and commercial uses of the Project. The west driveway would connect to the ground floor and subterranean parking. The middle driveway is proposed as a 30-foot wide full access in/right-out only driveway and would serve the residential uses. The middle driveway would connect to the resident pick-up/drop-off zone, subterranean parking, and loading trucks ingress. The east driveway would be a right-out only driveway that would serve loading trucks egress. Passenger vehicles would not use this driveway. Primary pedestrian access to the Project Site would be provided along Hollywood Boulevard. As part of the Project, the following modifications would be implemented along Hollywood Boulevard:

- Move the existing mid-block pedestrian crossing to the west side of the Project's west driveway and provide a full signal for pedestrian crossing and vehicular traffic. Both of the existing curb bulb-outs would be removed. A new curb bulb-out would be provided on the south side at the new pedestrian crossing.

- Add a second mid-block pedestrian crossing with a signal approximately 530 feet west of Bronson Avenue. A new curb bulb-out would be provided on the south side.

- Restripe Hollywood Boulevard to provide a two-way left turn lane. Left-turn ingress would be permitted from the two-way left turn lane into the Project Site at both the west driveway and the middle driveway. Left turn egress from the Project Site would be permitted at the signalized west driveway only.

(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.

The Mobility Plan further enumerates a variety of policies and programs in support of these goals. The Mobility Plan policies that are applicable to the Project are provided in Table IV.J-1 on page IV.J-30 along with a discussion of whether the Project would conflict with the applicable policies. As detailed therein and as concluded in the Transportation Assessment, the Project's proposed land uses and design features, including site access; pedestrian, bicycle, and transit accessibility; and loading areas, would not conflict with the policies of the Mobility Plan. In addition, the Project would not conflict with the implementation of future projects in the public ROW of Hollywood Boulevard, which is part of the PED, BEN, and TEN. Specifically, as provided in Appendix I of the Transportation Assessment, the Project would not preclude bicycle enhancements to the public right-of-way that the City is currently implementing or other enhancements the City may pursue in the future. As detailed in Section II, Project Description, of this Draft EIR, the Project includes

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

Objective, Policy, Program, or Plana	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.	**No Conflict.** As previously described above, vehicular access to the Project Site would be provided via three driveways along Hollywood Boulevard (referred to as the west driveway, middle driveway, and east driveway) that would provide access to the Project's ground-level, subterranean parking, and loading zone. The Project would incorporate pedestrian safety features to minimize pedestrian vehicular conflicts, including installing an additional signalized mid-block pedestrian crossing, reducing the number of driveways, and enhancing visibility by having the buildings setback from the property line. Primary pedestrian access to the Project Site would also be provided along Hollywood Boulevard. The proposed driveways would be designed consistent with LADOT standards and ADA requirements. The Project would also provide a second signalized mid-block pedestrian crossing on Hollywood Boulevard, west of Bronson Avenue. The Project does not propose to shift or narrow existing sidewalks. On-site bicycle parking would be provided, and the Project would not interfere with bicycle enhancements the City is currently implementing or other improvements the City may pursue in the future. The Project would also reduce the number of driveways on Hollywood Boulevard from four to three. Overall, the physical changes in the public ROW would not degrade but prioritize the safety and experience of the most vulnerable roadway users, including pedestrians and bicyclists.
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.	**No Conflict.** The Project would conform to all design element requirements, which may affect public ROWs, including proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility. As described above, adjacent to the Project Site, Hollywood Boulevard is part of the PED, BEN, and TEN. The Project would not conflict with the implementation of future projects in the public ROW of Hollywood Boulevard. In addition, the Project would provide bicycle parking for employees, residents, and visitors, thereby promoting public and active transportation modes. The Project would also include the development of a mix of residential, office, and commercial uses in close proximity to a number of public transportation options, thereby encouraging the use of alternative modes of transportation available in the vicinity of the Project Site.
Policy 1.6 Multi-Modal Detour Facilities Design detour facilities to provide safe passage for all modes of travel.	**No Conflict.** The Project is proposing a variety of modifications to Hollywood Boulevard, including, but not limited to, removing existing bulb-outs, installing a full traffic signal at the west driveway and a pedestrian signal further east, constructing new bulb-outs, and restriping Hollywood Boulevard. In the event temporary sidewalk or roadway closures are necessary, the Project's Construction Traffic

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

Objective, Policy, Program, or Plana	Analysis of Project Consistency
	Management Plan (Project Design Feature TR-PDF-1 above) would include detour routes for all applicable travel modes, including pedestrian, transit and bicycle users, to provide safe passage.
Chapter 2: World Class Infrastructure	
Policy 2.1 Adaptive Reuse of Streets Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	**No Conflict.** Although this policy relates to actions to be undertaken by the City and not individual development projects, the Project would not alter adjacent streets or the ROW in a manner that would hinder their ability to serve multiple purposes or preclude or conflict with future changes by various City Departments. The Project would maintain the sidewalks along the Project Site and provide additional space in the form of an entrance plaza for the restaurant and retail frontage.
Policy 2.2 Complete Streets Design Guide Establish the Complete Streets Design Guide as the City's document to guide the operations and design of streets and other public	**No Conflict.** The Project would conform to all design element requirements set forth in the Complete Streets Design Guide regarding public ROW, improved lighting elements, and landscaping design to ensure that the Project does not hinder sight distance, mobility or accessibly. Specifically, the Project would be developed within the boundaries of the Project Site and would not encroach into the public ROW. Proposed lighting would include shielded low to medium output exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. In addition, the Project would also include a landscaped central plaza along Hollywood Boulevard which would enhance pedestrian access.
Policy 2.3 Pedestrian Infrastructure Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** The Project Site is designed to allow easy pedestrian access between Project land uses and between buildings with lighted and landscaped walkways. Beyond the Project Site, the sidewalks on Hollywood Boulevard, which is part of the PED, would be maintained and enhanced with new landscaping and trees. The Project would also provide a new signalized pedestrian crossing point west of Bronson Avenue and relocate the existing signalized pedestrian crossing point to the west driveway and provide a full signal for pedestrian and vehicular traffic. The Project would provide separate pedestrian entrances from the vehicular driveways to the Project Site. All driveways would be designed to provide an adequate pedestrian refuge area between the driveways to ensure high-quality pedestrian access and create a safe and comfortable walking environment.
Policy 2.4 Neighborhood Enhanced Network Provide a slow speed network of locally serving streets.	**No Conflict.** Bronson Avenue is part of the NEN. The Project does not propose driveways along Bronson Avenue.

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

Objective, Policy, Program, or Plana	Analysis of Project Consistency
Policy 2.5 Transit Network Improve the performance and reliability of existing and future bus service.	**No Conflict.** Hollywood Boulevard is part of the TEN. The Project would encourage increased transit usage by developing a mixed-use project with convenient access to transit, including the Metro B Line Hollywood/Vine Station, which is located approximately 0.25 miles west of the Project Site, and several Metro bus lines along Hollywood Boulevard as well as DASH Hollywood. The Project would not directly affect any existing transit stops.
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.)	**No Conflict.** The Mobility Plan designates Hollywood Boulevard as a candidate for Tier 1 protected bicycle lanes (Cycle Track Class IV). The Project would not preclude the City's ability to implement the protected bike lanes. The Project would provide safe, convenient, and comfortable infrastructure and services to encourage bicycling for residents, employees, and visitors to the Project Site. Short-term bicycle parking would be provided by bike racks on all frontages of the Project Site. Long-term bicycle parking would be provided in the subterranean parking garage where locker rooms and showers would be provided.
Policy 2.9 Multiple Networks Consider the role of each mode enhanced network when designing a street that included multiple modes.	**No Conflict.** As summarized above and detailed in the Transportation Assessment, the streets in the vicinity of the Project Site include a mix of enhanced networks identified as part of the Mobility Plan. The Project would improve the overall pedestrian experience surrounding the Project Site and would not conflict with the City's bicycle plans or transit and pedestrian improvements as identified in the Mobility Plan.
Policy 2.10 Loading Areas Facilitate the provision of adequate on and off-street loading areas.	**No Conflict.** The Project would provide an off-street pick-up/drop-off area on the west and middle driveways with direct access to the Project's parking structure. Commercial loading would be provided internal to the Project Site, with loading access from Hollywood Boulevard via the middle and east driveway. Accordingly, the Project would provide adequate off-street loading areas to minimize impacts on the surrounding street network.
Chapter 3: Access for All Angelenos	
Policy 3.1 Access for All Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	**No Conflict.** The Project is conceived as a pedestrian- and transit-oriented development. It also would provide a new signalized pedestrian crossing point on Hollywood Boulevard. The Project would also provide dedicated passenger loading areas on the west and middle driveways with access to the subterranean parking garage. The Project would provide infrastructure (secure bicycle parking, easy bicycle accessibility to the Project Site) and services (such as locker rooms and showers) to encourage an alternative mode of transportation for residents, employees, and visitors to the Project Site. The Project would also encourage more transit usage by developing a mixed-

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

Objective, Policy, Program, or Plana	Analysis of Project Consistency
	use project with convenient access to transit, including Project's proximity to the Metro B Line Hollywood/Vine Station, which is located approximately 0.25 miles west of the Project Site. Finally, the Project would support those residents, employees, and visitors who choose to travel by automobile through the provision of three access points around the Project Site, on-site passenger loading and commercial loading, and adequate parking supply.
Policy 3.2 People with Disabilities Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** The Project would be designed to meet all the requirements of the Americans with Disabilities Act to accommodate the needs of people with disabilities. All street crossings adjacent to the Project Site, including those installed by the Project, would feature wheelchair-accessible curb cuts.
Policy 3.3 Land Use Access and Mix Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No Conflict.** The Project's mix of high-density residential uses, office space, and commercial uses located in proximity to transit would encourage ridesharing and use of alternative mobility modes, including walking and bicycling. Additionally, the Project's TDM features would further reduce vehicle trips. Accordingly, the Project would contribute to the promotion of equitable land use decisions in the City that would result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.
Policy 3.4 Transit Services Provide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services.	**No Conflict.** The Project would be located near the Metro B Line Hollywood/Vine Station, which is located approximately 0.25 miles west of the Project Site, as well as bus stops serviced by local bus lines with frequencies of 15 minutes or less. Access to nearby bus stops would be maintained with safe and convenient paths of travel to and from the Project Site.
Policy 3.5 Multi-Modal Features Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	**No Conflict.** The Project would support "first-mile, last-mile solutions" by developing a mixed-use development with multi-family residential uses, office space, and local-serving commercial uses located in an active urban area near major transit stops and local bus stops. The Metro B Line Hollywood/Vine Station is located within 0.25 mile west of the Project Site. Additionally, the Project would include several TDM strategies that encourage the use of transit and other alternative modes of transportation.
Policy 3.6 Regional Transportation & Union Station Continue to promote Union Station as the major regional transportation hub linking	**No Conflict.** The Project would be located within 0.25 miles of the Metro B Line Hollywood/Vine Station, which provides a direct connection to Union Station serving as a regional transportation hub for Amtrak, Metrolink, and other Metro rail lines. These transit lines provide direct access to the San Fernando Valley, San Gabriel Valley, Antelope Valley, Inland

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

Objective, Policy, Program, or Plana	Analysis of Project Consistency
Amtrak, Metrolink, Metro Rail, and highspeed rail service.	Empire, East Los Angeles, Westside, South Los Angeles, and Long Beach.
Policy 3.7 Regional Transit Connections Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.	**No Conflict.** Refer to the discussion above regarding Policy 3.6.
Policy 3.8 Bicycle Parking Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	**No Conflict.** The Project would provide convenient and secure long-term and short-term parking for bicycles in accordance with LAMC bicycle parking requirements. The long-term bicycle parking areas would include bicycle lockers and locker rooms with showers.
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.	**No Conflict** The Project would encourage alternative modes of travel through its proximity to multiple transit services, including the Metro B Line Hollywood/Vine Station located approximately 0.25 mile west of the Project Site. Additionally, the Project would include promotions and marketing to educate and inform employees and visitors to the Project Site of available mobility options and on-site bicycle parking and amenities as part of its TDM strategies to reduce the number of single occupancy vehicle trips to the Project Site.
Policy 4.13 Parking and Land Use Management Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** In accordance with AB 2097, the Project is not required to provide vehicle parking spaces. Nevertheless, the Project would provide 894 vehicle parking spaces in a three-level subterranean parking garage located entirely underneath the Hollywood Lot. The Project would not conflict with the portion of Policy 4.13 that discourages utilizing land for parking that could have been used for other valuable uses since all parking would be located within the proposed three-level subterranean parking garage. Moreover, parking for residents of the market-rate units would be unbundled and visitors to the non-residential uses would have to pay for parking. In addition, the Project would include features to encourage walking and bicycling. Specifically, the Project would include 63 short-term and 202 long-term bicycle parking spaces. Locker rooms and showers would also be provided and bike racks and showers would also be provided on all frontages of the Project Site. Furthermore, the Project would not conflict with the applicable goals and objectives of the SCAG 2024–2050 RTP/SCS to locate jobs and housing in infill locations served by public transit and facilitating active transportation and TDM.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.1 Sustainable Transportation	**No Conflict.** Although this policy relates to actions to be undertaken by the City and not by an individual development project, the Project would encourage sustainable transportation through pedestrian improvements and

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
Encourage the development of a sustainable transportation system that promotes environmental and public health.	providing on-site bicycle parking and facilities and separate pedestrian entries, both of which would promote the use of active transportation modes, such as biking and walking. Additionally, the Project would be located near transit stops serviced by rail (i.e., Metro B Line Hollywood/Vine Station approximately 0.25 miles west of the Project Site) and bus lines providing the Project's residents, employees, and visitors with public transportation alternatives.
Policy 5.2 Vehicle Miles Traveled (VMT) Support ways to reduce vehicle miles traveled (VMT) per capita.	**No Conflict.** The Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as demonstrated below in the analysis of Threshold (b). The Project's location in a dense area, development of a mix of land uses, and provision of short term and long-term on-site bicycle parking would contribute to encouraging alternative modes of transportation to reduce VMT per capita.
Policy 5.4 Clean Fuels and Vehicles Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.	**No Conflict.** The Project would provide EV parking and charging stations in accordance with applicable LAMC requirements to accommodate those who arrive in EVs. By providing EV parking and charging stations, the Project would contribute to the promotion of the usage of alternative fuels and supporting infrastructure.

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

Source: Eyestone; Fehr & Peers , 2024.

improvements along Hollywood Boulevard that both improves Project access and facilitates the implementation of bicycle lanes envisioned as part of the Hollywood Boulevard Safety and Mobility Project and the Access to Hollywood Project both of which are proposed by the City.

Additionally, the Project's mix of high-density residential uses, office space, and commercial uses located in close proximity to a highly active area and adjacent to a variety of public transit options, including the Metro B Line Hollywood/Vine Station (approximately 0.25 miles west of the Project Site), would encourage the development of a sustainable transportation system and would support ways to reduce VMT consistent with the Mobility Plan's Clean Environments & Healthy Communities policies. The Project would also provide bicycle parking for employees, residents, and visitors, thereby promoting public and active transportation modes and reducing the Project VMT per capita compared to the average for the area, as demonstrated in the VMT analysis under Threshold (b) later in this section.

The Mobility Plan also designates street and sidewalk width standards based on a street's functional classification. LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-ROW standards consistent with the Mobility Plan. Surrounding the Project Site, Hollywood Boulevard is an Avenue I, requiring a 50-foot half-ROW (including 15-foot sidewalks) and Carlton Way is a Local Street (standard) requiring a 30-foot half-ROW (including 12-foot sidewalks). The Project would also be required to provide a five-foot dedication to the required half-ROW along portions of Hollywood Boulevard corresponding to Parcels 4 and 5 of the Project Site, which would contain the proposed residential tower.

Overall, as detailed in Table IV.J-1 on page IV.J-30, the Project would not conflict with and would not obstruct the implementation of the Mobility Plan.

(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.J-2 on page IV.J-37. In summary, the Project would promote healthy living as a pedestrian- and transit-oriented mixed-use development, which would encourage active travel modes and generate lower VMT per capita for employees than the average for the area, thereby reducing air pollutants that may affect vulnerable people. The Project would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities. Furthermore, the Project would support healthy lifestyles by locating jobs near transit (Metro and LADOT Local Bus Lines and the Metro B Line Hollywood/Vine Station) within a TPA, providing bicycle amenities, and enhancing the pedestrian environment by providing shade trees and landscaping for a more comfortable pedestrian environment. Furthermore, the Project would not displace any existing housing but, rather, would convert an existing commercial use and surface parking areas into a high-density development with local-serving commercial space.

Overall, as provided in Table IV.J-2 and as determined in the Transportation Assessment, the Project strives to reduce vehicle trips and VMT by providing a mixed-use development with a variety of land uses in a neighborhood with high walkability and transit access. The Project's residential component would include both market-rate housing and affordable housing, which supports the plan's vision of access to affordable, healthy, and safe housing for residents of all ages and income levels. The Project's office, retail, and restaurant components would provide employment options for a neighborhood with a growing residential population and create a work destination that is easily accessible via public transportation. Thus, the Project would not conflict with the policies of the Plan for a Healthy Los Angeles.

Table IV.J-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	
Policy 1.5 Plan for Health Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	**No Conflict.** The Project is a pedestrian- and transit-oriented development. The Project would support initiatives to create transit-oriented developments by developing a mixed-use project with multi-family residential and office uses and local-serving retail/restaurant uses and promoting a jobs/housing balance in a dense urbanized area within a TPA well-served by transit. The Project would provide on-site bicycle parking and amenities to encourage bicycling for employees and visitors to the Project Site. As such, the Project would encourage the use of active travel modes and thereby promote healthy living. The Project would also provide pedestrian enhancements around the Project Site, including new street trees, seating, and other landscaping elements.
Policy 1.6 Poverty and Health Reduce the debilitating impact that poverty has on individual, familial, and community health and well-being by: promoting cross-cutting efforts and partnerships to increase access to income; safe, healthy, and stable affordable housing options; and attainable opportunities for social mobility.	**No Conflict.** The Project would include 44 affordable housing units. Also, the Project's 22,042 square feet of retail and restaurant space along with 136,000 square feet of office space would provide employment and entrepreneurial opportunities.
Policy 1.7 Displacement and Health Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.	**No Conflict.** The Project would not displace any existing housing; rather, it would convert an underutilized site, which is currently used for automobile-oriented purposes, into a mixed-use community. In addition to the 44 affordable housing units included as part of the Project, employment and entrepreneurial opportunities would be generated through its provision of up to 22,042 square feet of retail and restaurant space and 136,000 square feet of office space.
Chapter 5—An Environment Where Life Thrives	
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.	**No Conflict.** The Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as demonstrated in the Transportation Assessment and below in the Threshold (b) analysis. Further, the Project would implement TDM measures required to achieve compliance with the City's TDM Ordinance to further reduce the number of single-occupancy vehicle trips to the Project Site and VMT per

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
	capita. Since VMT directly contributes to GHG emissions, a reduction in VMT per capita would also reduce GHG per capita. The Project's location in a dense area, development of a mix of land uses, and provision of short-term and long-term on-site bicycle parking would also contribute to encouraging alternative modes of transportation to reduce VMT per capita. In addition, as evaluated in Sections IV.A, Air Quality, and IV.E., Greenhouse Gas Emissions, of this Draft EIR, the Project would result in less-than-significant impacts related to air quality and GHG emissions during construction and operation.

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

Source: Eyestone; Fehr & Peers, 2024.

(c) Hollywood Community Plan

As discussed above in the Regulatory Framework subsection, the applicable objective of the Hollywood Community Plan calls for the provision of a circulation system coordinated with land uses and densities and adequate to accommodate traffic and to encourage the expansion and improvement of public transportation service. As previously discussed above, the Project would provide new multi-family residential, office, and commercial uses within a TPA to further the development of Hollywood as a major center of employment and retail services and encourage the use of alternatives modes of transportation by users. The Project would be 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. In addition, the Project would implement TDM measures required to achieve compliance with the City's TDM Ordinance to further reduce the number of single-occupancy vehicle trips generated by the Project. Thus, the Project would not conflict with the applicable policy of the Hollywood Community Plan.

(d) Hollywood Redevelopment Plan

As discussed above in the Regulatory Framework Section, the Hollywood Redevelopment Plan includes a transportation-related goal (Goal 12) to: support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking, and mass transit systems with an emphasis on serving existing facilities and meeting future needs. As previously described, the Project's mix of high-density residential uses, office space, and commercial uses located in an area with a

variety of public transit options, including the Metro B Line Hollywood/Vine Station would reduce VMT and encourage the development of a sustainable transportation system. The Project would also provide bicycle parking for employees, residents, and visitors, thereby promoting the use of alternative modes of transportation. In addition, Section 518 of the Hollywood Redevelopment Plan provides guidance regarding circulation, parking, and loading facilities. The Project would not conflict with or prevent the City from pursuing the applicable improvements, including improving traffic flow along certain corridors in the plan area (Section 518.1 – Circulation) and designing public facilities to promote public safety and prevent unsightly or barren appearance (Section 518.2 – Parking and Loading). Specifically, the Project Site is not located adjacent to any of the circulation corridors identified for improvements in the Hollywood Redevelopment Plan. Furthermore, parking would be provided within a subterranean parking garage which would be shielded from public view. Vehicular access to the proposed subterranean parking would be separate from pedestrian and bicycle access to enhance the safety of all users of the Project Site. Based on the above, the Project would not conflict with the applicable goal and policies of the Hollywood Redevelopment Plan addressing the circulation system.

(e) LAMC

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. The Project would provide a total of 265 bicycle parking spaces (202 long-term and 63 short-term spaces). Short-term bicycle parking spaces would be provided on the ground level and long-term bicycle parking spaces would be provided within the subterranean parking. Locker rooms and showers would also be provided adjacent to the long-term bicycle parking area. The Project would meet the LAMC requirements for on-site bicycle parking supply. Therefore, the Project is consistent with LAMC Section 12.21 A.16.

LAMC Section 12.21 A.4 details off-street automobile parking requirements for new developments. However, in accordance with AB 2097, the Project is not required to provide any vehicle parking spaces. Nevertheless, the Project would provide 894 vehicle parking spaces in a three-level subterranean parking garage located entirely underneath the Hollywood Lot.

LAMC Section 12.26 J, the TDM Ordinance, establishes TDM requirements for projects with at least 25,000 square feet of non-residential floor area. Key requirements of the current TDM Ordinance include providing a bulletin board or display case of transportation information, carpool/vanpool loading and designated parking areas, access from external circulation system to LAMC-required bicycle parking areas, designated pathways and safe routes from buildings to public sidewalks, and, if determined necessary, improving bus stops. The Project would incorporate the required TDM measures in its design to comply with the City's TDM Ordinance to encourage use of alternative transportation modes and reduce single-occupancy vehicle use. The Project would provide internal and

external pedestrian connections to the public sidewalks and access to on-site bicycle parking areas. The Project would also include pedestrian enhancements surrounding the Project Site, such as new street trees and landscaping. Overall, the Project would be consistent with the current TDM Ordinance, and the Project would not conflict with LAMC Section 12.26 J.

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. In the vicinity of the Project Site, Hollywood Boulevard, Gower Street, and Bronson Avenue are Arterial streets and Carlton Way is a Local street. The Project would also be required to provide a five-foot dedication to the required half-ROW along portions of Hollywood Boulevard corresponding to Parcels 4 and 5 of the Project Site, which would contain the proposed residential tower.

Therefore, the Project would not conflict with the applicable sections of the LAMC.

(f) Vision Zero

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 discussed above, the northern boundary of the Project Site is Hollywood Boulevard, which is included in the High Injury Network (HIN). The Project proposes to replace the existing mid-block signalized pedestrian crossing on Hollywood Boulevard with two crossings with pedestrian signal control, which would improve pedestrian safety and convenience. Based on LADOT's proposed Vision Zero projects list, there is a proposed Vision Zero project which would add buffered bicycle lanes along Hollywood Boulevard. In addition, another proposed Vision Zero project is the Grant Elementary School Project, which would enhance the safety and comfort of routes to/from school with an emphasis on children walking and bicycling to school. The Project would not interfere with implementation of the Vision Zero Action Plan or these improvement plans. The Project Site is not located in a Safe Routes to School program area. Additionally, the Project's design and operation would not interfere with the implementation of future Vision Zero improvements along Hollywood Boulevard. Thus, the Project would not conflict with Vision Zero.

(g) Citywide Design Guidelines

As discussed above, the Citywide Design Guidelines are organized around three design approaches: pedestrian-first design, 360 degree design, and climate-adapted design. The Pedestrian-First Design approach of the Citywide Design Guidelines 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 promotes 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.

Consistent with the Pedestrian-First Design guidelines, the Project design includes separate pedestrian access points and pathways connecting to adjacent streets. As previously described, the Project would include three different access driveways to the Project Site for the residential and commercial uses and loading; these proposed driveways would be located and designed to minimize interaction between vehicles and pedestrians. The Project would provide common open space at the ground level that could be publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. New street trees and landscape elements would be incorporated along the Project Site frontages to provide a more comfortable and inviting environment for pedestrians. Furthermore, the Project's ground floor would include active uses to provide visual interest and enhance the pedestrian experience. Overall, the Project would not conflict with the transportation-related Citywide Design Guidelines.

Refer to Section IV.G, Land Use and Planning, of this Draft EIR, for additional analysis of the Project's consistency with the Citywide Design Guidelines.

(h) SCAG 2024–2050 RTP/SCS

A detailed analysis of the Project's consistency with applicable transportation-related policies of SCAG's 2024–2050 RTP/SCS is provided in Section IV.G, Land Use and Planning, of this Draft EIR, and Table 1, Land Use Tables in Appendix G, of this Draft EIR. As detailed therein, the Project would promote many of the policies established in SCAG's 2024–2050 RTP/SCS to reduce vehicle miles traveled and to encourage sustainable transportation. In particular, the Project would include the development of a mix of residential, office, and commercial uses in close proximity to a number of public transportation options, as well as other neighborhood-supporting uses, thereby encouraging the use of alternative modes of transportation available in the vicinity of the Project Site. Additionally, access to nearby bus stops would be maintained with safe and convenient paths of travel from the Project Site. Accordingly, the Project would support first/last mile connections from public transit facilities surrounding the Project Site to the Project Site. The

Project would further encourage sustainable transportation by providing on-site bicycle parking facilities and amenities and separate pedestrian entries, both of which would promote active transportation modes, such as biking and walking. Overall, the development of the Project in an area with convenient access to public transit and providing opportunities for walking and biking would reduce single-occupancy vehicle trips to the Project Site and VMT per capita.

In summary, the Project would not conflict with applicable transportation-related goals, objectives and policies of SCAG's 2024–2050 RTP/SCS.

(i) Conclusion

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

(2) Mitigation Measures

Project-level impacts related to a conflict with a program, plan, ordinance, or policy regarding the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

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

As shown in Table IV.J-3 on page IV.J-43, based on the Project's proposed land uses and location, the Project is estimated to generate 3,077 daily vehicle trips and 20,516 total

Table IV.J-3
VMT Analysis Summary

Land Use Information	Project
Multi-Family Housing	306 du
Affordable Family Housing	44 du
General Office	136,000 sf
General Retail[a]	18,004 sf
High-Turnover Sit-Down Restaurant[a]	4,038 sf
VMT Analysis[b]	
Resident Population	828
Employee Population	596
Project Area Planning Commission	Central
Project Travel Behavior Zone	Compact Infill (Zone 3)
Total Daily VMT[c]	20,516
Home-Based Production VMT[d]	3,547
Home-Based Work Attraction VMT[d]	4,149
Household VMT per Capita	4.3
Impact Threshold	6.0
Significant Impact	No
Work VMT per Employee	7.0
Impact Threshold	7.6
Significant Impact	No

du = dwelling units
rm = rooms
sf = square feet
[a] *Includes 10,000 square feet of retail/restaurant space.*
[b] *Project Analysis is from VMT Calculator output reports provided in Appendix A.*
[c] *See Appendix A, Report 1 of the Transportation Analysis.*
[d] *See Appendix A, Report 4 of the Transportation Analysis.*
Source: Fehr & Peers, 2024.

daily VMT. The Project would produce 3,547 home-based production VMT (used to calculate household VMT per capita) and 4,149 home-based work attraction VMT (used to calculate work VMT per employee). Based on the estimate of 828 residents, the Project would generate an average household VMT per capita of 4.3, which is less than the Central APC impact threshold of 6.0. Additionally, based on the estimate of 596 employees, the Project would generate an average work VMT per employee of 7.0, which is less than the Central APC impact threshold of 7.6. Thus, the Project would not result in a significant impact with respect to household or work VMT as estimated by the VMT calculator. Refer to the detailed

output from the VMT Calculator provided in Appendix D of the Transportation Assessment which in turn is included as Appendix J of this Draft EIR. Additionally, as discussed in Appendix I of the Transportation Assessment, the City's implementation of the Hollywood Boulevard Safety and Mobility Project and the Access to Hollywood Project would not change the significance criteria, approach, and conclusions for the Project's VMT analysis.

Based on the above, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and, as such, impacts associated with VMT would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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

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

(1) Impact Analysis

(a) Geometric Design Feature

As described in the Transportation Assessment, there are four existing vehicular access points serving the Project Site, two serving the dealership service and the other two serving the dealership parking. The Project would relocate and redesign vehicular access to the Project Site by providing a total of three vehicle access points (west driveway, middle driveway, and east driveway) to the Project Site via Hollywood Boulevard. As previously described above, the three vehicle access points would serve the different uses of the Project, as well as loading. The final design of the driveways would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. As such, the new Project driveways along Hollywood Boulevard would neither substantially increase vehicular conflicts with other vehicles, bicycles, and/or pedestrians nor present any geometric design hazards related to traffic movement. As described in Section II, Project Description, of this Draft EIR, and in Appendix I of the Transportation Assessment, the Project's proposed vehicular, pedestrian, and bicycle access would not materially change

with the implementation of the City's proposed Hollywood Boulevard Safety and Mobility Project and the Access to Hollywood Project, and the design of the driveways proposed as part of the Project would comply with LADOT driveway standards.

The Project would not modify roadway widths or otherwise affect the geometric design of roads surrounding the Project Site or implement any features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel. Pedestrian and bicycle access to the Project Site from surrounding streets would be provided separate from vehicular access. The Project driveways would also provide adequate sight distance, and the conceptual driveway design would not result in any impediments to the visibility of approaching vehicles, pedestrians, or bicycles. Rather, with the proposed improvements along Hollywood Boulevard adjacent to the Project Site, the Project would enhance the pedestrian walkway continuity along the Project Site frontages.

As further discussed in the Transportation Assessment, Hollywood Boulevard adjacent to the Project Site is part of the designated HIN. The Project's proposed modifications to pedestrian crossings on Hollywood Boulevard would improve pedestrian safety by providing signalized pedestrian crossings within the long (approximately 0.25-mile) block between Gower Street and Bronson Avenue. Pedestrian access to the Project Site would be provided via existing sidewalks around the street frontages of the Project Site and through pedestrian entry points on Hollywood Boulevard and Carlton Way. Residents and visitors arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project's access locations would be designed to City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety.

Based on the above, as concluded in the Transportation Assessment, the Project's design does not include hazardous geometric design features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves, and the development of the Project would not result in roadway alterations, such that hazards would be introduced adjacent to the Project Site.

(b) Incompatible Uses

The Project would not introduce farm equipment or other incompatible motor vehicle types to the local street system. Furthermore, the Project design incorporates and expands on the surrounding areas to provide a more attractive, well-defined, and accessible interaction between the Project and these surrounding uses. None of the Project design elements or land uses would be considered incompatible with the surrounding uses. There are no unusual or new obstacles that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians.

(c) Freeway Safety Analysis

A freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off-ramps and vehicles traveling on the freeway mainline. The City's guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. According to the Transportation Assessment included as Appendix J of this Draft EIR, the Project is not projected to add 25 or more trips to the surrounding freeway off-ramps.

Based on the above, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and, therefore, Project impacts related to Threshold (c) would be less than significant.

(2) Mitigation Measures

Project-level impacts related to substantially increasing hazards due to a geometric design feature or incompatible use would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to substantially increasing hazards due to a geometric design feature or incompatible use were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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 ROWs 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-1, 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 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 further analysis is required.**

e. Cumulative Impacts

(1) Impact Analysis

In addition to potential Project-specific impacts, both CEQA and the TAG require that the Project be reviewed in combination with nearby related projects (and in the case of CEQA and/or projected ambient growth) to determine if there may be a cumulatively significant impact resulting from inconsistencies with applicable transportation plans (or the goals, objectives and policies thereof), VMT, hazardous geometric design features, or emergency access. In accordance with the TAG, the cumulative analysis must include consideration of any related projects within 0.50 mile of the Project Site and any transportation system improvements in the vicinity. A list of the 16 related projects located within 0.50 mile of the Project Site is provided in Table III-1 in Section III, Environmental Setting, of this Draft EIR. Although the buildout years of many of the related projects are uncertain and may well extend beyond the Project's buildout year, and notwithstanding that some may not ultimately be approved or developed, all related projects were assumed to be completed by the estimated Project buildout year (i.e., 2029) for purposes of the traffic analysis.

(a) Consistency with Transportation Plans and Policies

The majority of the programs, plans, policies, and ordinances reviewed above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21 A.16 and the TDM Ordinance from LAMC Section 12.26 J apply to projects individually. Accordingly, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. However, as indicated in the Project-level analysis under Threshold (a) above, the Project would not result in inconsistencies with applicable transportation programs, plans, policies and ordinances. **Therefore, Project impacts with respect to conflicts with transportation-related programs, plans, policies, and ordinances would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Vehicle Miles Traveled

A development project would have a cumulative VMT impact if it were deemed inconsistent with SCAG's RTP/SCS, the regional plan to reach state air quality and GHG reduction targets. As detailed in the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less-than-significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG goals of the RTP/SCS. As described under Threshold (b) of the Project-level analysis above, the Project would not result in a significant VMT impact. **Therefore, the Project would result in a less than significant cumulative VMT impact. Thus, Project impacts with respect to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(c) Hazardous Design Features

According to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts. As indicated in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, Related Project No. 1 is proposed west of the Project Site at 6100 Hollywood Boulevard (Hollywood Gower Project). Based on the environmental document for the Hollywood Gower Project, access would be provided from Gower Street.[18] As such, the driveway locations between the Project and Related Project No. 1 would not be on the same block and, as such, are not anticipated to impose significant safety concerns. In addition, similar to the Project, Related Project No. 1 and the other related projects would be individually responsible for complying with the City's design standards and the guidelines (such as driveway spacing requirements) outlined in Threshold T-3 of the Transportation Assessment to address potential safety conflicts. Therefore, the Project and this related project would not result in cumulative impacts that would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts.

Furthermore, as discussed in the Project-level analysis under Threshold (c) above, the Project would not itself result in a significant impact associated with hazardous geometric design features.

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[18] *City of Los Angeles. Los Angeles City Planning. Hollywood Gower Project Final EIR, https://planning.lacity.org/eir/HollywoodGower/Feir/FEIR%20Sections/FEIR%20Hollywood%20&%20Gower%20Project.pdf, accessed October 20, 2023.*

Therefore, Project impacts with respect to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to transportation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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