# IV. Environmental Impact Analysis
# I. Transportation

## 1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts on transportation and traffic. This section is based on the *Transportation Impact Study for the Hollywood & Wilcox Project* dated June 2018 (Traffic Study) prepared by Gibson Transportation Consulting, Inc., and provided in Appendix O.1 of this Draft EIR, and the *Vehicle Miles Traveled Analysis for the Hollywood & Wilcox Project* (VMT Memo) dated December 9, 2019 prepared by Gibson Transportation Consulting Inc., and provided in Appendix O.2. The Traffic Study follows the Los Angeles Department of Transportation (LADOT) *Transportation Impact Study Guidelines* (December 2016),[1] which establish the guidelines for determining the appropriate traffic analysis for a project, analysis methodologies, significance thresholds, etc. The scope of analysis for the Traffic Study was developed in consultation with LADOT staff. The base assumptions and technical methodologies (e.g., trip generation, study locations, analysis methodology, etc.) were identified as part of the study approach and were outlined in a Memorandum of Understanding (MOU) dated August 24, 2016, which was reviewed and approved by LADOT (September 1, 2016). A copy of the MOU is provided in Appendix A of the Traffic Study. LADOT reviewed and approved the Traffic Study prior to circulation of this Draft EIR. A copy of LADOT's Assessment Letter for the Traffic Study is included as Appendix O.3 of this Draft EIR. The analysis of VMT is based on the VMT Memo. The VMT Memo was prepared pursuant to LADOT's *Transportation Assessment Guidelines* (July 2019) which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated 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 VMT Memo was approved by LADOT on December 18, 2019. A copy of LADOT's Assessment Letter for the VMT Memo is included as Appendix O.4 of this Draft EIR.

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[1] *LADOT's 2016 Transportation Impact Study Guidelines have since been superseded by their Transportation Assessment Guidelines from July 2019. However, the December 2016 Guidelines were in effect at the time the Traffic Study was prepared and approved by LADOT. The subsequent VMT analysis is based on the July 2019 Guidelines as indicated herein.*

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

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

In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018. The City of Los Angeles adopted the updated guidelines on May 2, 2019.

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

Additionally, on August 9, 2019, LADOT issued guidance on the implementation of the state mandated analysis of VMT:

> *On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines…. To manage this transition LADOT will honor executed MOUs for traffic studies that were processed under the prior LOS-based guidelines; however, we strongly recommend that these projects also evaluate VMT as part of their transportation analysis. The VMT analysis will help guarantee the project discloses the appropriate information as required by CEQA in the event that the project does not receive their entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects.*

The Project's Traffic Study was approved by LADOT in September 2016, prior to the adoption of the Transportation Assessment Guidelines. However, because the provisions of SB 743 are now operative, a discussion of VMT based on the VMT Memo included in Appendix O.2 of the Draft EIR is provided below.

SB 743 also adds Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."[2] A "transit priority area" is defined as an area within 0.5 miles 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 adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."[3] PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."[4] PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.[5]

The Project is a mixed-use development that proposes 260 multi-family residential units and 17,800 square feet of community-serving retail, restaurant, and office uses. The

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[2] *PRC Section 21099(d)(1).*

[3] *PRC Section 21099(a)(7).*

[4] *PRC Section 21064.3.*

[5] *PRC Section 21099(a)(4).*

Project Site is located within 0.25 miles from the Los Angeles County Metropolitan Transit Authority (Metro) Red Line Hollywood/Vine station, as well as 12 bus lines, the majority of which provide frequency of service intervals of 15 minutes or less during the A.M. and P.M. peak hours peak commute periods. Therefore, the Project is located in a transit priority area, as defined in PRC Section 21099.[6]. As such, pursuant to PRC Section 21099, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment. Refer to Section II, Project Description, of this Draft EIR, for a discussion of the Project's parking.

# 2. Environmental Setting

## a. Regulatory Framework

### (1) CEQA Guidelines Section 15064.3

As discussed above, recent changes to CEQA include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.2 (November 2019) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the Transportation Assessment Guidelines.

### (2) Congestion Management Program

The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. The CMP is managed at the countywide level and primarily uses an LOS

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[6] *The City's ZIMAS System confirms the location of the Project Site within a Transit Priority Area. See Zoning Information File No. 2452 and Parcel Profile Report for 1642 N. Wilcox Ave. (www.zimas.lacity.org).*

performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

### (3) Southern California Association of Government 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

In April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016-2040 RTP/SCS presents a long-term vision for the region's transportation system through the year 2040 and identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, SB 375 requires SCAG and other Metropolitan Planning Organizations (MPOs) throughout the state to develop a Sustainable Communities Strategy to reduce per capita GHG emissions through integrated transportation, land use, housing, and environmental planning.[7] Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[8] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.[9] The Project Site is

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[7] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 166.*

[8] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 189.*

[9] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 76.*

located within an HQTA as designated by the 2016–2040 RTP/SCS.[10,11] Please refer to Section IV.F, Land Use, for a detailed discussion of the applicable provisions of the 2016–2040 RTP/SCS that apply to the Project.

### (4) City of Los Angeles General Plan Framework Element, Transportation Element, and Mobility Plan 2035

The City of Los Angeles General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. The goals, objectives, policies, and related implementation programs of the Framework Element's Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999.

In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which is an update to the Transportation Element. The City Council has adopted several amendments to the Mobility Plan since its adoption, including the most recent amendment on September 7, 2016.[12] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

(1) Safety First;

(2) World Class Infrastructure;

(3) Access for All Angelenos;

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

(5) Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan. Refer to Section IV.F, Land Use,

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[10] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

[11] *Metro, High Quality Transit Areas—Southwest Quadrant map.*

[12] *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.*

of this Draft EIR for a discussion of the Project's consistency with the Transportation Chapter of the Framework Element and the Mobility Plan.

Street classifications are designated in the Transportation Element of the City of Los Angeles General Plan. The Mobility Plan has modified the street standards contained in the Transportation Element in an effort to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Roadways are now defined as follows in the Mobility Plan:

- Freeways—High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- 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 categories:
    - Boulevard I provide up to four travel lanes in each direction with a target operating speed of 40 miles per hour (mph).
    - Boulevard II provide up to three travel lanes in each direction with a target operating speed of 35 mph.
  - Avenues pass through both residential and commercial areas and include three categories:
    - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
    - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
    - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.
- 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. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.
- Local Streets—Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane

in each direction with a target operating speed of 15 to 20 mph. Local streets can be:

- Continuous local streets that connect to other streets at both ends, and/or
- Non-Continuous local streets that lead to a dead-end.

The Mobility Plan also includes the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network. The Transit Enhanced Network is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within one mile of the network by 2035. The Mobility Plan proposes to design and implement by 2035 Pedestrian Enhanced Districts within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and the highest concentration of pedestrian fatalities and severe injuries. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

### (5) Vision Zero

LADOT is implementing a program called Vision Zero. Vision Zero Los Angeles 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 identified a network of streets, called the High Injury Network, which has a higher incidence of severe and fatal collisions. The High Injury Network is comprised of 386 corridors that represent 6 percent of the City's street miles. Approximately 65 percent of all deaths and severe injuries involving people walking and biking occur on these 6 percent of streets. Hollywood Boulevard, adjacent to the northern boundary of the Project Site, has been identified in the High Injury Network. In addition, the following nearby streets have been identified: Franklin Avenue between Las Palmas Avenue and Cahuenga Boulevard; Yucca Street between Cahuenga Boulevard and Argyle Avenue; Selma Avenue between Schrader Boulevard and Vine Street; Sunset Boulevard; Highland Avenue south of Franklin Avenue; Cahuenga Boulevard between Franklin Avenue and Yucca Street; and Vine Street south of Franklin Avenue. The locations of these streets are shown in Figure II-1 of Section II. Project Description of this Draft EIR.

### (6) 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.

In addition, LAMC Section 12.37 states that no building or structure shall be erected or enlarged, and no building permit shall be issued therefor, on any lot in an R3 or less restrictive zone; or in any lot in the RD1.5, RD2, or RD3 zones; if the lot abuts a major or secondary highway or collector street unless one half of the street has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

### (7) Transit Oriented Communities Guidelines

Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22.A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program to encourage affordable housing near transit. The TOC Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program. TOC incentive areas are tiered based on a project site's distance from transit and the type of transit. The Project Site is located in a Tier 3 TOC area because of its proximity to the Metro Red Line Hollywood/Vine Station.

### (8) Citywide Design Guidelines

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

## b. Existing Street Systems

The existing street system in the vicinity of the Project Site consists of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the study area. The existing street system and transit network is shown in Figure IV.I-1 on page IV.I-10.

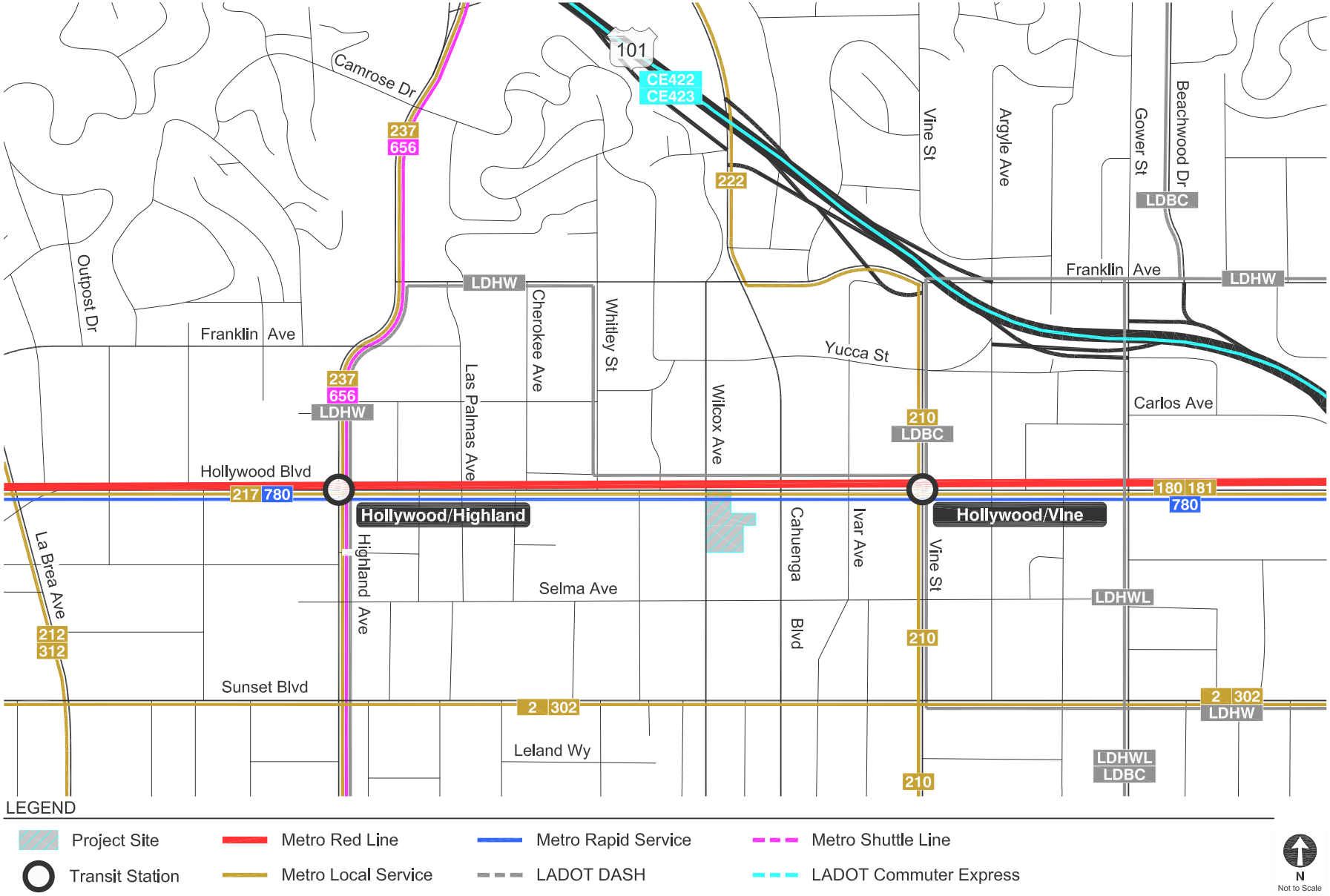


**Figure IV.I-1**
Existing Street System and Transit Network

Source: Gibson Transportation Consulting, Inc., 2018.

## (1) Freeways

The Project Site is located in the Hollywood area of Los Angeles. Primary regional access to the Project area is provided by the Hollywood Freeway (US-101). US-101 generally runs in the northwest-southeast direction and is located less than 0.25 miles north of the Project Site. In the vicinity of the study area, US-101 provides four travel lanes in each direction. Access to and from US-101 is available via interchanges at Franklin Avenue, Gower Street, and Hollywood Boulevard.

## (2) Streets

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

### *(a) North-South Streets*

- Highland Avenue—Highland Avenue is a designated Avenue I south of Franklin Avenue and a designed Boulevard II north of Franklin Avenue in the Mobility Plan. It travels in the north-south direction and is located west of the Project Site. It generally provides four to six nine- to 10-foot travel lanes, two to three lanes in each direction, and left-turn lanes at most intersections north of Melrose Avenue. One and two-hour metered parking is generally provided on both sides of the street south of Hollywood Boulevard in the vicinity of the Project Site.

- Whitley Avenue—Whitley Avenue is a designated Local Street in the Mobility Plan. It travels in the north-south direction, and is located west of the Project Site. It generally provides two 18-foot travel lanes, one lane in each direction. One and two-hour metered and unmetered parking is generally provided on both sides of the street in the vicinity of the Project Site.

- Wilcox Avenue—Wilcox Avenue is a designated Modified Avenue III in the Mobility Plan. It travels in the north-south direction and is located adjacent to the western boundary of the Project Site. Per the Mobility Plan, Wilcox Avenue adjacent to the Project Site requires a 20-foot half-width roadway within a 35-foot half-width right-of-way. It provides two 18-foot travel lanes, one lane in each direction. One-hour and two-hour metered and unmetered parking is generally provided on both sides of the street in the vicinity of the Project Site.

- Cahuenga Boulevard—Cahuenga Boulevard is a designated Modified Avenue II south of Franklin Avenue and a designated Avenue I north of Franklin Avenue in the Mobility Plan. It travels in the north-south direction and is located east of the Project Site. It generally provides four 10- to 18-foot travel lanes, two lanes in each direction, and left-turn lanes at most intersections. Two-hour metered

parking is generally provided on both sides of the street in the vicinity of the Project Site.

- Ivar Avenue—Ivar Avenue is a designated Local Street in the Mobility Plan. It travels in the north-south direction and is located east of the Project Site. It generally provides two 22- to 24-foot travel lanes, one lane in each direction. Two-hour metered parking is generally provided on both sides of the street in the vicinity of the Project Site.

- Vine Street—Vine Street is a designated Avenue II in the Mobility Plan. It travels in the north-south direction and is located east of the Project Site. It generally provides four travel lanes, two lanes in each direction, and left-turn lanes at most intersections. One-hour and two-hour metered and unmetered parking is generally provided on both sides of the street in the vicinity of the Project Site.

- Argyle Avenue—Argyle Avenue is a designated Local Street in the Mobility Plan. It travels in the north-south direction and is located east of the Project Site. It generally provides two 18-foot travel lanes, one lane in each direction, and left-turn lanes at most intersections. One-hour and two-hour metered parking is generally provided on both sides of the street in the vicinity of the Project Site.

*(b) East-West Streets*

- Franklin Avenue—Franklin Avenue is a designated Modified Avenue III west of Cahuenga Boulevard and a designated Modified Avenue II east of Cahuenga Boulevard in the Mobility Plan. It travels in the east-west direction and is located north of the Project Site. It generally provides two to four nine- to 19-foot travel lanes, one to two lanes in each direction, and left-turn lanes at most intersections. Two-hour unmetered parking with P.M. peak-hour restrictions is generally provided on the north side of the street and unrestricted parking is generally provided on the south side of the street between Cahuenga Boulevard and Ivar Avenue. Both one-hour unmetered and unrestricted parking in generally provided on the south side of the street east of Ivar Avenue.

- Yucca Street—Yucca Street is a designated Local Street west of Cahuenga Boulevard and east of Vine Street and a designated Avenue II between Cahuenga Boulevard and Vine Street in the Mobility Plan. It travels in the east-west direction and is located north of the Project Site. It generally provides two 18-foot travel lanes, one lane in each direction, and left-turn lanes at most intersections. Two-hour metered parking is generally provided on both sides of the street in the vicinity of the Project Site.

- Hollywood Boulevard—Hollywood Boulevard is a designated Avenue I in the Mobility Plan. It travels in the east-west direction and is located adjacent to the northern boundary of the Project Site. Per the Mobility Plan, Hollywood Boulevard adjacent to the Project Site requires a 35-foot half-width roadway within a 50-foot half-width right-of-way. It generally provides four 10- to 18-foot

travel lanes, two lanes in each direction, and left-turn lanes at most intersections. One and two-hour metered parking is generally available on both sides of the street in the vicinity of the Project Site.

- Selma Avenue—Selma Avenue is a designated Local Street in the Mobility Plan. It travels in the east-west direction and is located south of the Project Site. It generally provides two 20-foot travel lanes, one lane in each direction. Two-hour metered parking is generally provided on both sides of the street in the vicinity of the Project Site.

- Sunset Boulevard—Sunset Boulevard is a designated Avenue I in the Mobility Plan. It travels in the east-west direction and south of the Project Site. It generally provides four to six nine- to 11-foot travel lanes, two to three lanes in each direction, and left-turn lanes at most intersections. Although parking restrictions are variable, one and two-hour metered parking with peak-hour restrictions is generally provided on both sides of the street in the vicinity of the Project Site.

## (3) Regional Transportation System

### *(a) Freeways*

As discussed above, primary regional access to the Project area is provided by US-101, which generally runs in a northwest-southeast direction and is located approximately 0.25 miles north of the Project Site. In the vicinity of the Project Site, US-101 provides four travel lanes in each direction. US-101 is accessible via Hollywood Boulevard, Vine Street, Cahuenga Boulevard, and Sunset Boulevard.

### *(b) Transit System*

As shown in Figure IV.I-1 on page IV.I-10, the Project vicinity is well served by public transit, including both bus and rail service. Metro operates the Red Line subway which runs between North Hollywood and Downtown Los Angeles. The closest Metro Red Line station to the Project Site is located at Hollywood Boulevard and Vine Street, approximately 0.25 miles east of the Project Site. Metro also provides several bus lines in the form of both rapid and local bus service in the vicinity of the Project Site. LADOT Downtown Area Shuttle (DASH) and LADOT Commuter Express also provide bus transit service in the area. The following provides a brief description of the bus lines providing service in the Project vicinity. For additional information on the transit lines operating in the vicinity of the Project Site, refer to Table 3 of the Traffic Study (Appendix O.1 of this Draft EIR).

- Metro Local 2/Limited 302—Route 2/302 is a local/limited line that travels from downtown Los Angeles to Pacific Palisades via Sunset Boulevard, with average headways of approximately 10 to 15 minutes during the weekday morning and afternoon peak hours. This line provides service to Hollywood, West

Hollywood, and Westwood and travels along Sunset Boulevard in the vicinity of the Project Site.

- Metro Local 180/181—Route 180/181 is a local line that travels from Hollywood to Altadena via Los Feliz Boulevard and Colorado Boulevard, with average headways of approximately 15 to 25 minutes during the weekday morning and afternoon peak hours. This line provides service to Pasadena, Eagle Rock, and Glendale, and travels along Hollywood Boulevard in the vicinity of the Project Site.

- Metro Local 210—Route 210 is a local line that travels from Hollywood to Redondo Beach via Crenshaw Boulevard with average headways of approximately 15 to 20 minutes during the weekday morning and afternoon peak hours. This line provides service to Torrance, the Metro Green Line Crenshaw Station, and the Metro Expo Line Expo/Crenshaw Station, and travels along Vine Street in the vicinity of the Project Site.

- Metro Local 212/Limited 312—Route 212/312 is a local/limited line that travels from the Hollywood/Vine Station to the Hawthorne/Lennox Station via La Brea Avenue, with average headways of approximately 15 to 25 minutes during the weekday morning and afternoon peak hours. This line provides service to Miracle Mile, Baldwin Hills, and Inglewood. It travels along La Brea Avenue in the vicinity of the Project Site.

- Metro Local 217—Route 217 is a local line that travels from Vermont Avenue and Sunset Boulevard to Fairfax Avenue and Washington Boulevard, with average headways of approximately 15 to 20 minutes during the weekday morning and afternoon peak hours. This line provides service to Los Feliz, Hollywood, and Culver City, and travels along Hollywood Boulevard in the vicinity of the Project Site.

- Metro Local 222—Route 222 is a local line that travels from Sunland to Hollywood via Hollywood Way, Barham Boulevard, and Cahuenga Boulevard, with average headways of approximately 35 to 50 minutes during the weekday morning and afternoon peak hours. This line provides service to Sun Valley, Burbank, and Universal City, and travels along Hollywood Boulevard in the vicinity of the Project Site.

- Metro Local 237/656—Route 237/656 is a local line that travels from Panorama City to Hollywood via Highland Avenue, Vineland Avenue, and Van Nuys Boulevard, with average headways of approximately 40 to 50 minutes during the weekday morning and afternoon peak hours. This line provides service to Van Nuys and North Hollywood and travels along Highland Avenue in the vicinity of the Project Site.

- Metro Rapid 780—Route 780 is a rapid line that travels from Washington Boulevard and Fairfax Avenue to Pasadena via Fairfax Avenue and Hollywood

Boulevard, with average headways of approximately 15 minutes during the weekday morning and afternoon peak hours. This line provides service to Los Feliz, Glendale, and Eagle Rock, and travels along Hollywood Boulevard in the vicinity of the Project Site.

- LADOT DASH Beachwood Canyon—DASH Beachwood Canyon is a local line that travels from the Metro Red Line Hollywood/Vine Station to Beachwood Drive and Westshire Drive, with average headways of approximately 25 to 30 minutes during the weekday morning and afternoon peak hours. This line provides service to Beachwood Canyon and Hollywood, and travels along Vine Street in the vicinity of the Project Site.

- LADOT DASH Hollywood—DASH Hollywood is a local line that travels from Argyle Avenue and Hollywood Boulevard to Santa Monica Boulevard and Vermont Avenue via Hollywood Boulevard and Fountain Avenue, with average headways of 30 minutes during the weekday morning and afternoon peak hours. This line provides service to the Metro Red Line Vermont/Sunset, Vermont/Santa Monica, and Hollywood/Vine Stations, and travels along Sunset Boulevard in the vicinity of the Project Site.

- LADOT DASH Hollywood/Wilshire—DASH Hollywood/Wilshire is a local line that travels from the Metro Purple Line Wilshire/Western Station to the Metro Red Line Hollywood/Vine Station with average headways of approximately 25 to 30 minutes during the weekday morning and afternoon peak hours. This line provides service to Koreatown and Hollywood, and travels along Gower Street in the vicinity of the Project Site.

- LADOT Commuter Express 422—Route 422 is a commuter express line that travels from Thousand Oaks to downtown Los Angeles, with average headways of 15 minutes during the morning peak hours and 20 minutes during the afternoon peak hours. It provides service to Westlake Village, Woodland Hills, Sherman Oaks and Hollywood. This line travels along US 101 in the vicinity of the Project Site.

- LADOT Commuter Express 423— Route 423 is a commuter express line that travels from Thousand Oaks to downtown Los Angeles, with average headways of 15 minutes during the morning peak hours and 20 minutes during the afternoon peak hours. It provides service to Westlake Village, Woodland Hills and the Encino Park and Ride. This line travels along US 101 in the vicinity of the Project Site.

## c. Existing Project Site Conditions

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area as well as surface parking. Included in this floor area is the

9,000-square-foot Attie Building, which will be retained and integrated with the Project. The balance of the improvements on the Project Site will be removed to provide for development of the Project. Vehicular access to the surface parking is provided via a driveway on Wilcox Avenue.

## d. Existing Pedestrian and Bicycle Facilities

### (1) Pedestrian Facilities

The area surrounding the Project Site includes a developed network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features. There are wide sidewalks lining the streets, crosswalks available at intersections, and shops, restaurants, and other services within walking distance of the Project Site. The following signalized intersections provide pedestrian facilities to the Project Site: Whitley Avenue and Hollywood Boulevard; Wilcox Avenue and Hollywood Boulevard; Wilcox Avenue and Selma Avenue; and Cahuenga Boulevard and Hollywood Boulevard. Each of the listed signalized intersections provides pedestrian phasing, crosswalk striping, and Americans with Disabilities Act (ADA) wheelchair ramps. In addition, as noted above, Hollywood Boulevard, adjacent to the northern boundary of the Project Site, has been identified in the High Injury Network. In addition, the following nearby streets have been identified as part of the High Injury Network: Franklin Avenue between Las Palmas Avenue and Cahuenga Boulevard; Yucca Street between Cahuenga Boulevard and Argyle Avenue; Selma Avenue between Schrader Boulevard and Vine Street; Sunset Boulevard; Highland Avenue south of Franklin Avenue; Cahuenga Boulevard between Franklin Avenue and Yucca Street; and Vine Street south of Franklin Avenue.

### (2) Bicycle Facilities

Based on the City's 2010 Bicycle Plan, the existing bicycle system in the study area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle lanes (Class II) are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic to ensure safety. Bicycle routes (Class III) are identified as bicycle-friendly streets where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. The bicycle facilities described below are provided along corridors within the study area:

- Bicycle Lanes (Class II)
  - Cahuenga Boulevard north of Yucca Street
- Bicycle Routes (Class III)
  - Vine Street south of Yucca Street

- Argyle Avenue between Franklin Avenue and Selma Avenue
- Franklin Avenue east of Argyle Avenue
- Yucca Street between Vine Street and Argyle Avenue
- Selma Avenue west of Gower Street

# e. Future Traffic Context

## (1) Related Projects

The Traffic Study analysis also considers the effects of other development proposals (related projects) either proposed, approved, or under construction in the vicinity of the Project Site. The list of related projects was compiled based on information obtained from the Department of City Planning and LADOT, as well as recent studies of projects in the area. A total of 107 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.[13] These related projects are projects that are located within an approximately 2-mile radius from the Project Site. Although the buildout years of many of these related projects are uncertain and may well be beyond the Project's buildout year, notwithstanding that some may not be approved or developed, all related projects were considered. Therefore, the projected traffic growth as a result of the related projects is a conservative estimate.

## (2) Future Base Transportation System Improvements

### *(a) Future Roadway Improvements*

Future conditions would generally include roadway improvements that have been funded and are reasonably expected to be implemented prior to Project buildout in 2023. These roadway improvements would be expected to change the physical configuration at the study intersections. However, these improvements depend on the construction of the development projects, which are not guaranteed to be built or may not be completed by

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[13] *As discussed in Section III, Environmental Setting, of this Draft EIR, the Hollywood Community Plan Update, is also included in the list of related projects. The Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2023, well before the Community Plan Update's horizon year. Moreover, 2023 is a similar projected buildout year as many of the 107 related development projects. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.*

2023. Therefore, the analysis conservatively concluded that these improvements would not be implemented by 2023. Other proposed traffic/trip reduction strategies such as the proposed creation of a Hollywood Transportation Management Organization and Transportation Demand Management (TDM) programs for individual buildings and developments were conservatively omitted from the Future Conditions analysis.

*(b) City Bicycle Plan*

The 2010 Bicycle Plan identifies designated bicycle facilities planned for implementation. Specifically, within the study area, bicycle lanes are proposed along Hollywood Boulevard, Sunset Boulevard, Yucca Street between Cahuenga Boulevard and Vine Street, Cahuenga Boulevard, Vine Street south of Yucca Street, and Wilton Place south of Franklin Avenue. In addition, bicycle-friendly streets are proposed on Franklin Avenue, Argyle Avenue north of Selma Avenue, Selma Avenue, and Carlos Avenue. As a current schedule for implementation of these bicycle lanes is not available, based on consultation with LADOT, no changes to vehicular lane configurations as a result of potential new bicycle lanes were assumed in this analysis.

*(c) Mobility Plan 2035*

In the Mobility Plan, the City identifies key corridors of mobility-enhanced networks. Specific improvements in such networks have not yet been identified, and no schedule for implementation has been made available. As such, there have been no changes to vehicular lane configurations as a result of the Mobility Plan. However, the following mobility-enhanced networks do include corridors in the vicinity of the Project Site:

- Transit Enhanced Network—Hollywood Boulevard was identified as a Moderate Transit-Enhanced Street.

- Neighborhood Enhanced Network—The following corridors were identified as part of a Neighborhood Enhanced Network: Franklin Avenue; Yucca Street between Argyle Avenue and Vista Del Mar Avenue; Selma Avenue west of El Centro Avenue; Carlos Avenue between Vista Del Mar Avenue and Bronson Avenue; Cahuenga Boulevard south of Hollywood Boulevard; Argyle Avenue between Franklin Avenue and Selma Avenue; El Centro Avenue south of Selma Avenue; and Vista Del Mar Avenue north of Franklin Avenue and between Yucca Street and Carlos Avenue.

- Bicycle Enhanced Network/Bicycle Lane Network—Hollywood Boulevard was identified for Protected Bicycle Facilities. The following corridors were identified for Bicycle Lanes: Highland Avenue; Cahuenga Boulevard north of Hollywood Boulevard; Vine Street south of Yucca Street; Wilton Place between Franklin Avenue and Sunset Boulevard; Yucca Street between Cahuenga Boulevard and Vine Street; and Sunset Boulevard.

- Vehicle Enhanced Network—Highland Avenue north of Sunset Boulevard and Sunset Boulevard between Highland Avenue and US-101 were identified as part of the Vehicle Enhanced Network.

- Pedestrian Enhanced District—The following corridors were identified as part of the Pedestrian Enhanced District: Franklin Avenue; Yucca Street between Vine Street and Argyle Avenue; Hollywood Boulevard; Sunset Boulevard; Highland Avenue south of Franklin Avenue; Cahuenga Boulevard south of Franklin Avenue; Vine Street south of Franklin Avenue; Argyle Avenue south of Franklin Avenue.

# 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;***

***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.***

As previously discussed, SB 743 (PRC Section 21099(b)(1)) directed OPR to prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within TPAs. The revised guidelines are required to prohibit the consideration of automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, new CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact." As noted above, on July 30, 2019, the City adopted VMT as a criterion in determining transportation impacts under CEQA and LADOT issued guidance on August 9, 2019. LADOT will honor executed MOUs for traffic studies that were processed under the prior LOS-based guidelines. Nevertheless, based on current guidance, VMT is analyzed below under Threshold (b).

For this analysis the Appendix G Thresholds provided above are relied upon. The analysis utilizes factors and considerations identified in the 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The methodology and base assumptions used in this analysis were established by LADOT, and, where LADOT does not prescribe a specific methodology, the criteria identified in the *L.A. CEQA Thresholds Guide* were used. The *L.A. CEQA Thresholds Guide* criteria is discussed below as part of the methodology discussion.

## b. Methodology

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

As discussed above, with implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As such, this analysis will not go into detail on the anticipated effect of the Project with respect to LOS. As described above, CEQA Guidelines threshold (a) has been updated to require an analysis of the proposed Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. In accordance with the Transportation Assessment Guidelines, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent.

### (2) Vehicle Miles Traveled

#### *(a) VMT Impact Thresholds*

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

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the state's

goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its Transportation Assessment Guidelines in July 2019. Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the Transportation Assessment Guidelines states that a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15 percent below the existing average work VMT per employee for the APC area in which it's located.

Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT. The Transportation Assessment Guidelines identify a daily household VMT per capita impact threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6 for the Central APC, in which the Project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 6.0 and average work VMT per employee be equal to or lower than 7.6, the Project's overall VMT impact would be less than significant.

*(b) VMT Analysis Methodology*

LADOT developed City of Los Angeles VMT Calculator Version 1.2 (November 2019) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with the Transportation Assessment Guidelines.

*(i) Travel Behavior Zone*

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as follows:

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

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

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

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

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

*(ii) Mixed-Use Development Methodology*

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

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

*(iii) Travel Demand Forecasting*

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

*(iv) Population and Employment Assumptions*

As previously stated, the VMT thresholds identified in the *Transportation Assessment Guidelines* are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling resources.[14] A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.

*(v) Transportation Demand Management Measures*

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

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

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

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

### (3) Hazardous Geometric Design Features

The Transportation Assessment Guidelines includes a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle and pedestrian safety impacts, project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]) are reviewed. Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result are considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. Using this methodology, the Project design, including proposed infrastructure improvements, land uses, and open spaces, are reviewed to determine if the Project would increase and/or create a hazardous geometric design feature(s) and/or incompatible use.

### (4) Emergency Access

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

## c. Project Design Features

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

**TR-PDF-1:** Prior to the start of construction, the Project Applicant will prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction;

- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Wilcox Avenue, to ensure traffic safety on public rights-of-way;
- Schedule construction material deliveries during off-peak periods to the extent practical;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Control truck and vehicle access to the Project Site with flagmen;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity; and/or
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

As part of its commitment under Assembly Bill (AB) 900, the Jobs and Economic Improvement through Environmental Leadership Act and as required by LADOT's December 2019 assessment letter included as Appendix O.4 of this Draft EIR, the Project would also include a TDM program designed to achieve a 15-percent trip reduction:

**TR-PDF-2:** The Project shall prepare and implement a Transportation Demand Management (TDM) Program to reduce peak hour vehicular traffic to and from the Project Site by 15 percent. The TDM would promote non-automobile travel and reduce the use of single-occupant vehicle trips with a comprehensive program of design features, transportation services, education programs, and incentive programs. These strategies can include, but are not necessarily limited to, the following:

- Transportation Information Center, educational programs, kiosks, and/or other measures;
- Promotion and support of carpools and rideshare;
- Bicycle amenities such as racks;
- Parking incentives and support for formation of carpools/vanpools;
- On-site TDM coordinator;

- Mobility hub support;
- Contribution to the City's Bicycle Trust Fund for implementation of bicycle improvements in the Project area; and
- Participation as a member in the future Hollywood Community Transportation Management Organization (TMO), when operational.

In addition to its AB 900 commitment, as required by LADOT's December 2019 assessment letter included as Appendix O.4 of this Draft EIR, the Project would contribute toward Transportation Systems Management (TSM) improvements within the Hollywood-Wilshire District that may be considered to better accommodate intersection operations and increase intersection capacity throughout the Study Area:

**TR-PDF-3:** The Project would contribute up to $270,000.00 toward Transportation Systems Management (TSM) improvements within the Hollywood-Wilshire District that may be considered to better accommodate intersection operations and increase intersection capacity throughout the Study Area. LADOT has determined that a 1 percent improvement in V/C ratio could be applied to the intersections along the targeted corridor to account for the TSM improvements. The TSM improvements would target the Cahuenga Boulevard and Franklin Avenue corridors. Potential TSM improvements include the installation of new conduits and interconnect/fiber optic cables to improve network capacity to better utilize adaptive traffic signal control, additional closed circuit television cameras to real-time monitoring of intersection, corridor, transit, and pedestrian operations within the Hollywood area. The installation of new conduits and interconnect/fiber optic cables to improve network capacity to better utilize adaptive traffic signal control, additional closed circuit television cameras to real-time monitoring of intersection, corridor, transit, and pedestrian operations within the Hollywood area.

## d. Analysis of Project Impacts

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

### (1) Impact Analysis

Table 2.1-2 in the Transportation Assessment Guidelines provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: LAMC Section 12.37; Mobility Plan

policies 2.3 through 2.7 and 2.10; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced Network, and Bicycle Enhanced Network Programs; Mobility Plan programs PL.1 and PK.10; Transit Oriented Community Guidelines; Vision Zero; and Citywide Design Guideline 2.[15] The Project's potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

*(a) Los Angeles Municipal Code*

As noted above, LAMC Section 12.37 pertains to development or expansion of buildings along highways and collector streets. Per Table 2.1-2 of the Transportation Assessment Guidelines, LAMC Section 12.37 also applies to streets designated Boulevard I, Boulevard II, Avenue I, Avenue II, and Avenue III in the Mobility Plan. Hollywood Boulevard is a designated Avenue I and Wilcox Avenue is a designated Modified Avenue III in the Mobility Plan. Per the Mobility Plan, Hollywood Boulevard adjacent to the Project Site requires a 35-foot half-width roadway within a 50-foot half-width right-of-way and Wilcox Avenue adjacent to the Project Site requires a 20-foot half-width roadway within a 35-foot half-width right of way. Because Hollywood Boulevard and Wilcox Avenue adjacent to the Project Site meet the half-width roadway and right-of-way requirements of the Mobility Plan, the Project would not conflict with LAMC Section 12.37. In addition, no widening or roadway improvement conditions have been required by Bureau of Engineering or as mitigation measures for the Project.

*(b) Mobility Plan 2035*

*(i) Mobility Plan Policies 2.3 through 2.7 and 2.10*

*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:* While this is a citywide policy, the Project would support its implementation. Specifically, one of the primary objectives of the Project is to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses. Streetscape amenities provided by the Project would include a row of street trees on Wilcox Avenue, pedestrian-scale lighting fixtures and elements, and landscaped outdoor seating areas. The Project is requesting a merger as part of a Vesting Tentative Tract Map request, resulting in the widening of the sidewalk by 5 feet along a portion of Wilcox Avenue, creating a 15-foot full width concrete sidewalk with tree wells, and locate vehicular

[15] *Table 2.1-2 of the Transportation Assessment Guidelines specifically references Citywide Design Guidelines 4.1.01 and 4.1.02. However, the Citywide Design Guidelines were updated in October 2019 and these designations no longer apply. Guidelines 4.1.01 and 4.1.02 are now incorporated into Guideline 2.*

loading and drop-off within the parking structure. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

*Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets*: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

*Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service*: While this is a citywide policy, the Project would not conflict with its implementation. As detailed in Table 4 of the Traffic Study included in Appendix O.1 of this Draft EIR, the transit system serving the Project Site has available capacity for 8,153 persons during the A.M. peak-hour and 7,197 persons during the P.M. peak-hour. The Project would generate approximately 30 net new transit trips during the A.M. peak hour and 35 net new transit trips during the P.M. peak hour, amounting to less than 0.5 percent of the available capacity during the A.M. or P.M. peak hours. Furthermore, in 2008, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress and an additional half-cent sales tax increase to fund transportation projects through Measure M in 2016. As such, the Project's net increase in transit trips would be partially offset by improvements to transit service in the Project area. Accordingly, it is concluded that the Project would not cause the capacity of the transit system to be substantially exceeded and the Project would not conflict with Mobility Plan Policy 2.5.

*Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities*: While this is a citywide policy, the Project would support its implementation. As described in detail in Subsection 2.e.(2) on page IV.I-16, the existing bicycle system in the study area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III) and no dedicated bicycle lanes exist in the immediate vicinity of the Project Site. In the Mobility Plan, Tier 1 Protected Bicycle Lanes are proposed along Hollywood Boulevard as part of the Bicycle Enhanced Network (a network of protected bicycle lanes and bicycle paths that provide a higher level of comfort for a variety of users). In addition, as part of the Bicycle Lane Network (a network of arterial roadways that will receive striping treatments to prioritize bicyclists), Tier 2 Bicycle Lanes are proposed on Vine Street south of Yucca Street, Wilton Place between Franklin Avenue and Sunset Boulevard, Yucca Street between Cahuenga Boulevard and Vine Street, and Tier 3 Bicycle Lanes are proposed on Highland Avenue, Cahuenga Boulevard north of Hollywood Boulevard, and Sunset Boulevard. Furthermore, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. Bicycle parking requirements per LAMC Section 12.21-A,16(a) include short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points. Long-term

bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public. As shown in Table IV.I-1 on page IV.I-33 in the analysis below, based on LAMC Section 12.21-A,16(a), and the permitted reductions in vehicular parking spaces described above, the Project would be required to provide a minimum of 304 bicycle parking spaces (35 short-term and 269 long-term bicycle parking spaces). Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

*Policy 2.7 Vehicle Network—Provide vehicular access to the regional freeway system*: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Primary regional access would continue to be provided by US-101 located approximately 0.4 miles east of the Project Site. Access to and from US-101 is available via interchanges at Franklin Avenue, Gower Street, and Hollywood Boulevard. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.

*Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas:* The Project would include a loading area within Level 1 and shielded from the public right-of-way by the commercial uses on Wilcox Avenue. As such, delivery trucks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

*(ii) Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network*

As discussed above in the analyses for Policy 2.5 and 2.6, the Project would not conflict with Mobility Plan policies related to transit and bicycle networks. With respect to pedestrian facilities, vehicular access to the Project Site would be provided by a two-way ingress and egress driveway on Wilcox Avenue. Pedestrian access to the community-serving retail, office, and restaurant components of the Project would be provided via sidewalks along Hollywood Boulevard and Wilcox Avenue. Pedestrian access to the residential building would be provided via a residential lobby located along Wilcox Avenue. Additionally, as noted above, the sidewalk along Wilcox Avenue would be widened and upgraded with street trees as part of the Project. The Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed driveways would be designed to limit potential impediments to visibility, and the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

*(iii) Mobility Plan Programs PL.1 and PK.10*

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. Vehicular access to the Project Site would be provided via a new driveway on Wilcox Avenue for commercial and residential parking and loading and drop-off would occur within the parking structure. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PK.10 directs the City to establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. While this is a citywide program, the Project would not conflict with its implementation. Specifically, as discussed in the Initial Study included as Appendix A of this Draft EIR, the design and implementation of the new driveway would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, the Project would not conflict with Mobility Plan Program PK.10.

*(c) Transit Oriented Community Guidelines*

The Transit Oriented Community (TOC) Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC program. While the Project Site is located in a Tier 3 TOC, the Project is not seeking incentives under the TOC program. Therefore, the TOC Guidelines do not apply to the Project.

*(d) Vision Zero*

As noted above, Hollywood Boulevard has been identified in the High Injury Network. While no Vision Zero Safety Improvements are currently planned near the Project Site,[16] Project improvements to the pedestrian environment would not preclude future improvements by the City. Therefore, the Project would not conflict with Vision Zero.

*(e) Citywide Design Guideline 2*

Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting

[16] *City of Los Angeles, Vision Zero Safety Improvements, http://ladot.maps.arcgis.com/apps/View/index.html?appid=77df605a3eb142c7a0abc1c65bcf4861, accessed January 31, 2020.*

parking and driveways toward the rear or side of buildings and away from the public right of way; and on corner lots, orienting parking as far from the corner as possible. The Project would prioritize pedestrian access by providing multiple pedestrian access points on both Hollywood Boulevard and Wilcox Avenue, and a single driveway for vehicular access which would be located on the west side of the building on Wilcox Avenue. The Project would also maintain continuity of the sidewalk by including only one curb cut on the Project Site. Therefore, the Project would not conflict with Citywide Design Guideline 2.

*(f) Other Programs, Plans, Ordinances, and Policies*

The Project would not conflict with the Plan for a Healthy Los Angeles, Hollywood Community Plan, LAMC Section 12.26J (TDM Ordinance), Walkability Checklist, Mobility Hub Reader's Guide, or LADOT Manual of Policies and Procedures (Design Standards). Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing and jobs near transit, as well as enhancing the pedestrian environment and providing bicycle parking. As discussed in detail in Section IV.F, Land Use and Appendix H, Land Use Tables of this Draft EIR, the Project would not conflict with Hollywood Community Plan or Walkability Checklist policies related to encouraging pedestrian activity and reducing VMT. In addition, the Project would include a TDM Program consistent with LAMC Section 12.26J and as required by the Project's AB 900 application, as well as Mobility Hub support. The Project would also comply with all applicable LADOT design standards. **Therefore, the Project would not conflict with these programs, plans, ordinances, and policies.**

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

## (2) Mitigation Measures

The Project is consistent with adopted City plans, programs, ordinances and policies. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

The Project is consistent with adopted City plans, programs, ordinances and policies and would be less than significant without mitigation.

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

As discussed in Section 2.2.3, Impact Criteria, of the Transportation Assessment Guidelines and Section 3.b, Methodology, above, a development project will have a potential impact if it meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the APC in which the project is located.

- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.

- For regional serving retail projects, the project would result in a net increase in VMT.

- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

### (1) Impact Analysis

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's four land uses and their respective sizes as the primary input. Based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 586
- Total Employees: 49
- APC: Central
- TBZ: Urban
- Maximum VMT Reduction: 75 percent

The VMT analysis results based on the VMT Calculator are summarized in Table IV.I-1 on page IV.I-33. Detailed output from the VMT Calculator is provided in the VMT Memo included as Appendix O.2 of this Draft EIR. It should be noted that as part of the Project design, measures would be implemented to reduce the number of single occupancy vehicle trips to the Project Site. In addition, as previously discussed, pursuant to Project Design Feature TR-PDF-1, the Project would develop a TDM program prior to the issuance of a Certificate of Occupancy that would allow the Project to achieve the

**Table IV.I-1**
**VMT Evaluation Summary**

| Project Description | Total Population[a] | Total Employees[b] | Area Planning Commission (APC) | Travel Behavior Zone (TBZ)[c] | Maximum VMT Reduction[d] |
|---|---|---|---|---|---|
| 260 Apartment Units<br>3,580 sf Office<br>11,020 sf Retail<br>3,200 sf High-Turnover Restaurant | 586 | 49 | Central | Urban | 75% |

**VMT Evaluation**

| | | Household VMT[e] | | | | | Work VMT[f] | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Scenario | TDM Strategies | Total VMT | VMT per Capita | Percent Reduction | VMT Threshold | Signif. VMT Impact? | Total VMT | VMT per Employee | Percent Reduction | VMT Threshold | Signifi. VMT Impact? |
| Project | None | 3,200 | 5.5 | — | 6 | No | 223 | 4.5 | — | 7.6 | No |

*sf = square feet*

[a] *Total population estimate is based on a population factor of 2.25 persons/unit for multi-family households. The population factor is based on Census data for the City of Los Angeles.*

[b] *Total employment estimate is based on the following employment factors:*

*Office: 4.0/1,000 sf*
*Retail: 2.0/1,000 sf*
*High-Turnover Restaurant: 4.0/1,000 sf*

*The employment factors are based on employee data from the Los Angeles Unified School District, 2012 SANDAG Activity Based Model, ITE trip generation rates, US Department of Energy, and other modeling resources.*

[c] *An "Urban" TBZ is characterized in City of Los Angeles VMT Calculator Documentation (LADOT and DCP, February 2019) as high-density neighborhoods characterized by multi-story buildings with a dense road network.*

[d] *The maximum allowable VMT reduction is based on the Project's designated TBZ.*

[e] *Household VMT per Capita is based on the "home-based work production" and "home-based other production" trip types.*

[f] *Work VMT per Employee is based on the "home-based work attraction" trip types.*

*Source: Gibson Transportation Consulting, Inc., 2019.*

transportation efficiency required as part of its AB 900 certification. For purposes of this analysis, the following project design features were accounted for in the VMT evaluation:

- Reduced parking supply to provide less than the direct LAMC requirement without consideration of additional parking reduction mechanisms (i.e., Bicycle Parking Ordinance, Specific Plan or Enterprise Zone areas, etc.);
- Bicycle parking supply in accordance with the LAMC; and
- Pedestrian network improvements within the Project Site and connecting off-site.

As shown in Table IV.I-1 on page IV.I-33, with application of the TDM strategies listed above, the VMT Calculator estimates that the Project would generate 3,200 total household VMT and 223 total work VMT. Thus, based on the population and employee assumptions above, the Project would generate an average household VMT per capita of 5.5 and an average work VMT per employee of 4.5. Both the household VMT per capita and the work VMT per employee for the Project would fall below the significance thresholds for the Central APC of 6.0 household VMT per capita and 7.6 work VMT per employee, which are 15 percent below the existing average household VMT per capita and 15 percent below the average work VMT per employee, respectively, for the APC in which the Project is located. **Therefore, the Project, without application of any TDM strategies, would not result in a significant VMT impact, and would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).**

### (2) Mitigation Measures

Impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant. No mitigation measures are required.

### (3) Level of Significance After Mitigation

Impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant without mitigation.

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

### (1) Impact Analysis

As evaluated in the Initial Study for the Project, which is included in Appendix A of this Draft EIR, the Project does not include hazardous geometric design features and the Project design would be reviewed by the Los Angeles Department of Building and Safety

and the LAFD during the City's plan review process to ensure all applicable safety requirements are met. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the Los Angeles Fire Department (LAFD). The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the proposed uses would be similar to and consistent with the surrounding uses. **Therefore, no impact with respect to hazardous design features would occur, and no further analysis is required.**

### (2) Mitigation Measures

No impact would occur with respect to hazardous geometric design features. No mitigation measures are required.

### (3) Level of Significance After Mitigation

No impact would occur with respect to hazardous geometric design features. No mitigation measures are required.

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

### (1) Impact Analysis

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the Los Angeles Police Department (LAPD) in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Pursuant to Project Design Feature TR-PDF-1, a Construction Traffic Management Plan would be prepared and submitted to LADOT for review and approval, and would require construction-related traffic to be scheduled outside of commuter peak hours to the extent feasible. Therefore, haul truck trips would occur outside of peak hours to the extent feasible and no peak-hour construction traffic impacts are expected during the excavation and grading phase of construction.

In addition, while traffic along surrounding roadways would increase with operation of the Project, the traffic generated by the Project would not result in any significant impacts on operating conditions of the intersections nearest the primary Project Site access. All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of

emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. **Therefore, the Project would not result in inadequate emergency access, and, as such, impacts to emergency access would be less than significant.**

### (2) Mitigation Measures

Impacts with respect to inadequate emergency access would be less than significant. No mitigation measures are required.

### (3) Level of Significance After Mitigation

Impacts with respect to inadequate emergency access would be less than significant without mitigation.

## e. Cumulative Impacts

### (1) Impact Analysis

#### *(a) Conflict With a Program, Plan, Ordinance, or Policy Addressing the Circulation System*

As discussed above, the Project's increase in transit trips would represent only 0.5 percent of the available capacity during the A.M. and P.M. peak hours and would be partially offset by improvements to transit service in the Project area. Given the available capacity on transit serving the Project Site, and improvements to transit service funded by the Measure R sales tax increase, the Project and related projects would not result in a significant cumulative impact with respect to transit.

As also discussed above, the Project would result in a less than significant impact with respect to VMT. If any of the related projects result in a significant VMT impact, they would be required to mitigate such impacts through a TDM program to reduce vehicle trips. If there was a cumulative impact as a result of the related projects having significant and unavoidable VMT impacts, the Project's contribution would not be cumulative considerable.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, Project impacts would be less than significant. Similar to the Project, the related projects would be required to provide short-term and long-term bicycle parking in accordance with LAMC Section 12.21-A,16(a). Furthermore, related project access locations would be required to conform to City standards and would be designed to provide

adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. Therefore, the Project and related projects would not result in a significant cumulative impact with respect to pedestrian and bicycle facilities.

**Thus, Project impacts with regard to conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would not be cumulatively considerable, and cumulative impacts would be less than significant.**

*(b) Vehicle Miles Traveled*

As discussed in the Transportation Assessment Guidelines, long-term or cumulative effects are determined through a consistency check with SCAG's 2016-2040 RTP/SCS and projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of the RTP/SCS. As discussed in detail in Section IV.E, Greenhouse Gas Emissions, and Section IV.F, Land Use, of this Draft EIR, the Project would be consistent with the 2016-2040 RTP/SCS. Furthermore, asdescribed above, the Project would result in an average household VMT per capita of 5.5 and an average work VMT per capita per employee of 4.5, below the thresholds for the Central APC (6.0 and 7.6, respectively). **Therefore, the Project would be consistent with the long-term VMT and GHG reduction goals of the 2016-2040 RTP/SCS and Project impacts with respect to VMT would be less than significant and, as a result, the Project's contribution to cumulative impacts would not be cumulatively considerable. Thus, the Project's cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

*(c) Hazardous Geometric Design Features*

As discussed above, no Project-level impact would occur with respect to hazardous geometric design features. The roadways in the surrounding area are part of the existing urban roadway network and do not contain sharp curves or dangerous intersections. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by LAFD. The design of related projects would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the proposed uses would be similar to and consistent with the surrounding uses. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to hazardous geometric design features would be less than significant.**

*(d) Emergency Access*

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. Like the Project, the related projects would be anticipated to provide for safe and efficient circulation including adequate sight distances, implement multi-modal transportation strategies to facilitate the dispersal of traffic, and alleviate project-specific traffic access impacts, as appropriate. In addition, as previously discussed, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas, including areas near any temporary travel lane closure(s). Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to emergency access would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Cumulative impacts would be less than significant without mitigation.