

IV. Environmental Impact Analysis

K. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is primarily based on the *Transportation Assessment for the Hilton Universal City Project* (TA) prepared by Linscott, Law & Greenspan, Engineers (LLG), dated November 2020 and included as **Appendix K-1** of this Draft EIR.

The analysis of Vehicle Miles Traveled (VMT) is also based on the TA provided in Appendix K-1 of this Draft EIR. The 2020 TA was prepared pursuant to Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG), dated July 2020, which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) Guidelines from the State of California 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 TA was approved by LADOT on December 18, 2020. A copy of LADOT's Assessment Letter for the TA is included as **Appendix K-2** of this Draft EIR.

Subsequent to the preparation of the 2020 TA, minor changes to the Project were proposed. Additionally in August 2022, LADOT published an updated version of the TAG with revised requirements.¹ As such, a TA Addendum (2022 TA Addendum) was prepared by LLG, accounting for the updated 2022 TAG and changes to the Project. The 2022 TA Addendum and corresponding LADOT Assessment Letter are provided as **Appendix K-3** of this Draft EIR. Subsequent to the 2022 TA Addendum, additional revisions to the Project were proposed and another TA Addendum (2023 TA Addendum) was prepared by LLG. The 2023 TA Addendum was approved by LADOT on May 10, 2023. A copy of the 2023 TA Addendum and LADOT's Assessment Letter for the 2023 TA Addendum are included as **Appendix K-4** of this Draft EIR. This analysis is also based on the TA and Addenda.

¹ LADOT, Transportation Assessment Guidelines, August 2022.

2. Environmental Setting

a) Regulatory Framework

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

- Americans with Disabilities Act of 1990
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035
- Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines (TAG)
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Interim Guidance for Freeway Safety
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles

(1) Federal

(a) *Americans with Disabilities Act of 1990*

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

(2) State

(a) *Complete Streets Act*

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

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

(b) *Assembly Bill 32 and Senate Bill 375*

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

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

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

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

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

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

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

(c) *California Vehicle Code*

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

(d) *Senate Bill 743*

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

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

California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

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

(e) *CEQA Guidelines Section 15064.3*

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop² or a stop along an existing high quality transit corridor³ should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (July 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the current version of the TAG.

(3) Regional

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

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional

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

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

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

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

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

(4) Local

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

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several

amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.⁴ The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. The Mobility Plan includes five main goals that define the City’s high-level mobility priorities:

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

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

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

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

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered

⁴ 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.

approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the Bicycle Enhanced Network (BEN), Transit Enhanced Network (TEN), Vehicle Enhanced Network (VEN), and Neighborhood Enhanced Network (NEN). In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts (PED). These networks and PED are defined as follows:

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

*(b) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass
Community Plan*

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

The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area. The Community Plan includes the following transportation and circulation goals, objectives, and policies that are applicable to the Project:

Objective 10-2: To increase the work trips and non-work trips made on public transit.

Goal 11: Encourage alternative modes of transportation to the use of single occupancy vehicles (SOV) in order to reduce vehicle trips.

Objective 11-1: To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

Policy 11-1.1: Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, walking, bicycles, etc.).

Objective 13-1: To the extent feasible and consistent with the Mobility Plan's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable levels of service (LOS) and insure that necessary road access and street improvements are provided to accommodate traffic generated by new development.

Policy 13-1.4: New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking.

Goal 14: A system of safe, efficient, and attractive bicycle, pedestrian, and equestrian facilities.

Objective 14-1: To promote an adequate system of safe bikeways for commuter, school, and recreational use.

Policy 14-1.2: Encourage the provision of showers, changing rooms, and bicycle storage at new and existing non-residential developments and public places.

Objective 14-2: To promote pedestrian oriented areas and pedestrian routes for commuter, school, recreational use, economic revitalization, and access to transit facilities.

Goal 15: A sufficient system of well-designed and convenient on-street parking and off-street parking facilities throughout the Plan Area.

Objective 15-1: To provide parking in appropriate locations in accord with Citywide standards and community needs.

Policy 15-1.1: Consolidate parking where appropriate, to minimize the number of ingress and egress points onto arterials.

Policy 15-1.3: New parking lots and new parking garages shall be developed in accordance with design standards.

(c) *Los Angeles Municipal Code*

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

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued therefore, on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

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

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

(d) *LADOT Transportation Assessment Guidelines*

On July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model, and transportation impact thresholds based on VMT pursuant to CEQA Guidelines Section 15064.3 and the 2019 CEQA updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in August 2022. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices,

to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.⁵

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

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

(f) *Vision Zero*

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

(g) *Interim Guidance for Freeway Safety*

In May 2020, LADOT issued Interim Guidance for Freeway Safety Analysis (City Freeway Guidance) identifying City requirements for a CEQA safety analysis of Caltrans facilities as part of a transportation assessment. The City Freeway Guidance relates to the identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

(h) *Citywide Design Guidelines*

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

(i) *Plan for a Healthy Los Angeles*

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional

⁵ Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, 2022.

leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.⁶ Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b) Existing Conditions

(1) Street System

The Project Site is located at 555 Universal Hollywood Drive within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area. As shown in Figure II-1 of Chapter II, *Project Description*, of the Draft EIR, the Project Site is generally bounded by undeveloped parcels and Universal Hollywood Drive to the north; landscaped hillside, a surface parking lot, and W.C. Fields Drive to the south; a surface parking lot and Hotel Drive to the east; and the Sheraton Universal Hotel to the west. The streets in the Project vicinity are under the jurisdiction of the City of Los Angeles. Freeways are under the jurisdiction of Caltrans. Immediate public access to the Project Site is provided via Universal Hollywood Drive. In addition, access is also provided to the Project Site via Hotel Drive, which is a private street owned by NBC Universal, for which the Project Applicant has a vehicular easement.

(a) Freeways

Primary regional access to the Project Site is provided by US-101 (Hollywood Freeway). The Hollywood Freeway runs in a northbound/southbound direction and is located south of the Project Site. The Hollywood Freeway extends from the Los Angeles County border to downtown Los Angeles. In the Project vicinity, five mixed-flow freeway lanes are provided in each direction of the Hollywood Freeway. Northbound off-ramps are provided at Lankershim Boulevard (0.25 mile west of the Project Site) and Campo de Cahuenga Way (0.4 mile northwest of the Project Site). Northbound on-ramps are provided at Universal Studios Boulevard (0.4 mile southeast of the Project Site) and Campo de Cahuenga Way (0.45 mile northwest of the Project Site). Southbound on-ramps are provided at Universal Studios Boulevard (0.4 mile southeast of the Project Site), Cahuenga Boulevard (0.15 mile southwest of the Project Site) and Ventura Boulevard (0.4 mile west of the Project Site). A southbound off-ramp is provided at Cahuenga Boulevard (0.15 mile south of the Project Site).

(b) Roadways

The characteristics of the local roadways in the Project vicinity are described below, including City of Los Angeles General Plan roadway designations, if applicable.

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

(i) *East/West Roadways*

Campo de Cahuenga Way is located northwest of the Project Site. In the Project area, the City has not provided a roadway designation for Campo de Cahuenga Way. Three through travel lanes are provided in the eastbound direction on Campo de Cahuenga Way. In the westbound direction, two through travel lanes are provided on Campo de Cahuenga Way east of the Metro B (Red) Line Universal City/Studio City Station Parking Lot Driveway intersection, and three through travel lanes are provided west of the Metro Station Parking Lot Driveway intersection. Separate exclusive left-turn lanes are provided in the eastbound direction on Campo de Cahuenga Way at the US-101 Ramps and Lankershim Boulevard intersection. A separate exclusive right-turn lane is provided in the westbound direction on Campo de Cahuenga Way at the US-101 Ramps intersection. Additionally, a separate exclusive left-turn lane for use by transit vehicles only is provided in the westbound direction on Campo de Cahuenga Way at the Metro Station Parking Lot Driveway intersection. East of Lankershim Boulevard, Campo de Cahuenga Way becomes Universal Hollywood Drive.

Universal Hollywood Drive borders the northerly boundary of the Project Site. North of the Project Site, Universal Hollywood Drive curves to become a north-south oriented roadway. In the Project area, Universal Hollywood Drive is designated as a Private Street. Three through travel lanes are provided in each direction on Universal Hollywood Drive. Separate exclusive left- and right-turn lanes are provided in the westbound direction on Universal Hollywood Drive at the Lankershim Boulevard intersection. West of Lankershim Boulevard, Universal Hollywood Drive becomes Campo de Cahuenga Way.

Ventura Boulevard is located west of the Project Site. In the Project area, Ventura Boulevard is designated as a Boulevard II. Two through travel lanes are provided in each direction on Ventura Boulevard. A separate exclusive left-turn lane is provided in the eastbound direction on Ventura Boulevard at the Lankershim Boulevard intersection. Southeast of Lankershim Boulevard, Ventura Boulevard becomes Cahuenga Boulevard.

Cahuenga Boulevard is located south and west of the Project Site. In the Project area, Cahuenga Boulevard is designated as a Boulevard II. Two through travel lanes are provided in each direction on Cahuenga Boulevard. Separate exclusive left-turn lanes are provided on Cahuenga Boulevard in each direction at the US-101 Southbound Ramps – Regal Place intersection, in the westbound direction at the Lankershim Boulevard intersection, and in the eastbound direction at the Universal Studios Boulevard intersection. Separate exclusive right-turn lanes are provided on Cahuenga Boulevard in the westbound direction at the Lankershim Boulevard, US-101 Southbound Ramps/Regal Place, and Universal Studios Boulevard intersections. North and west of Lankershim Boulevard, Cahuenga Boulevard becomes Ventura Boulevard.

W.C. Fields Drive is located south of the Project Site. Between Barham Boulevard and Universal Studios Boulevard, W.C. Fields Drive is a one-way eastbound roadway. In the Project area, W.C. Fields Drive is designated as a Private Street west of Universal Studios Boulevard and as a Local Street – Standard east of Universal Studios Boulevard. One through travel lane is provided in each direction on W.C. Fields west of Universal Studios Boulevard. Three through travel lanes are provided in the eastbound direction on W.C. Fields east of Universal Studios Boulevard. Separate exclusive left- and right-turn lanes are provided in each direction on W.C. Fields Drive at the Universal Studios Boulevard intersection. East of Barham Boulevard, W.C. Fields Drive becomes Cahuenga Boulevard East.

Cahuenga Boulevard East is located southeast of the Project Site. Cahuenga Boulevard East is a one-way westbound roadway. In the Project area, Cahuenga Boulevard East is designated as a Local Street – Standard. Two through travel lanes are provided in the westbound direction on Cahuenga Boulevard East within the Project study area. Separate exclusive right-turn lanes are provided on Cahuenga Boulevard East at the Barham Boulevard intersection. West of Barham Boulevard, Cahuenga Boulevard East becomes W.C. Fields Drive.

(ii) North/South Roadways

Hotel Drive is located east of the Project Site. Hotel Drive is a private roadway owned by NBC Universal. In the Project area, Hotel Drive has one travel lane in each direction north and south between Universal Hollywood Drive/Coral Drive intersection and W.C. Fields Drive, where this road terminates. The Project Applicant currently has a vehicular easement over Hotel Drive as this roadway provides direct access to the existing Hilton Universal City Hotel and would provide access to the Project.

Lankershim Boulevard is located west of the Project Site. Lankershim Boulevard is designated as a Boulevard II north of Ventura Boulevard/Cahuenga Boulevard and as a Local Street – Standard south of Ventura Boulevard/Cahuenga Boulevard. In the Project area, Lankershim Boulevard provides three through travel lanes in each direction north of Ventura Boulevard/Cahuenga Boulevard. South of Ventura Boulevard/Cahuenga Boulevard, one through travel lane is provided in each direction on Lankershim Boulevard. Separate exclusive left- and right-turn lanes are provided in each direction on Lankershim Boulevard at the Campo de Cahuenga Way/Universal Hollywood Drive intersection, and in the southbound direction at the Ventura Boulevard/Cahuenga Boulevard intersection.

Regal Place is located southwest of the Project Site and is designated as a Local Street – Standard. In the Project area, Regal Place provides one through travel lane in each direction.

Universal Studios Boulevard is located southeast of the Project Site. In the Project area, Universal Studios Boulevard is designated as Private Street north of the US-101 overpass and as a Local Street – Standard south of the US-101 overpass. North of W.C. Fields Drive, Universal Studios Boulevard is designated as a Private Drive within the County of Los Angeles' Universal Studios Specific Plan. Three through travel lanes are provided in each direction on Universal Studios Boulevard, south of the W.C. Fields Drive intersection. North of W.C. Fields Drive, four through travel lanes are provided in each direction on Universal Studios Boulevard. Separate exclusive left-turn lanes are provided on Universal Studio Boulevard in the northbound direction at the W.C. Fields Drive intersection and in the southbound direction at the US-101 Southbound On-Ramp intersection. Separate exclusive left- and right-turn lanes are provided in the southbound direction on Universal Studios Boulevard at the Cahuenga Boulevard West intersection.

Barham Boulevard is located southeast of the Project Site. In the Project area, Barham Boulevard is designated as an Avenue I Scenic. Two through travel lanes are provided in each direction on Barham Boulevard. A separate exclusive right-turn lane is provided in the southbound direction on Barham Boulevard at the W.C. Fields Drive/Cahuenga Boulevard East intersection.

(2) Public Transit

Public transit service in the Project area is currently provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and the City of Burbank. **Figure IV.K-1, Existing Transit Service**, shows the various transit lines providing service in the Project vicinity, while **Table IV.K-1, Existing Transit Service**, details the transit service near the Project Site. Universal Studios Hollywood also provides a complimentary shuttle service from the existing Hilton Los Angeles/Universal City Hotel (i.e., the Existing Hotel Building) to Universal Studios Hollywood and Universal CityWalk and a complimentary tram from the Metro B (Red) Line) Universal City/Studio City Station to the theme park entrances.



SOURCE: Los Angeles County Metropolitan Transportation Authority

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Figure IV.K-1
Existing Transit Service

**TABLE IV.K-1
EXISTING TRANSIT SERVICE**

Transit Route	Operator	Service Type	Service From/To	Roadway(s) Near Site	Weekday Headways	
					A.M.	P.M.
B (Red) Line	Metro	Heavy Rail	North Hollywood to Downtown Los Angeles	Lankershim Boulevard	10-20 mins.	10-12 mins.
150/240	Metro	Local	Studio City to Canoga Park, Northridge (via Ventura Boulevard and Reseda Boulevard)	Campo de Cahuenga Way, Ventura Boulevard	12-15 mins.	12-15 mins.
155	Metro	Local	Burbank to Sherman Oaks (via Riverside Drive and Olive Avenue)	Lankershim Boulevard, Campo de Cahuenga Way, Ventura Boulevard	60 mins.	30-60 mins.
222	Metro	Local	Sun Valley to Hollywood (via Hollywood Way, Barham Boulevard, and Cahuenga Boulevard)	Barham Boulevard, Cahuenga Boulevard West, Cahuenga Boulevard East	60 mins.	30 mins.
224	Metro	Local	Sylmar to Studio City (via San Fernando Road and Lankershim Boulevard)	Lankershim Boulevard, Campo de Cahuenga Way	10 mins.	20-30 mins.
237	Metro	Local	Mission Hills to Hollywood (via Woodley Avenue, Chandler Boulevard, and Lankershim Boulevard)	Lankershim Boulevard, Ventura Boulevard, Cahuenga Boulevard West, Cahuenga Boulevard East	60 mins.	30-60 mins.
750	Metro	Rapid	Studio City to Canoga Park (via Ventura Boulevard)	Campo de Cahuenga Way, Ventura Boulevard	20 mins.	20 mins.
Pink Route	BurbankBus	Local	Burbank to Studio City (via Riverside Drive and Olive Avenue)	Lankershim Boulevard, Campo de Cahuenga Way	15 mins.	15 mins.

SOURCE: LLG, TA, 2020; LLG, 2022 TA Addendum; LLG, 2023 TA Addendum.

(3) Bicycle and Pedestrian Facilities

Existing designated bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, Bicycle Friendly Streets, etc.) identified in the City's 2010 Bicycle Plan and located within an approximately 0.75-mile radius from the Project Site include Lankershim Boulevard, Ventura Boulevard, and Cahuenga Boulevard, which are designated for Class II Bicycle Lanes.⁷

Public sidewalks and pedestrian facilities are provided on Universal Hollywood Drive. Specifically, public sidewalks approximately five feet in width are provided along the Project Site's Universal Hollywood Drive frontage. **Figure IV.K-2, Pedestrian Facilities in Project Vicinity**, show the following pedestrian facilities in the direct vicinity of the Project Site:

- Americans with Disabilities Act (ADA) compliant access ramps, including some with the yellow truncated domes, which are designed to assist and warn pedestrians who are blind or visually impaired, are provided at the following intersections in the immediate vicinity of the Project Site:
 - Sheraton Drive / Universal Hollywood Drive
 - Universal Hollywood Drive / Hilton Driveway
 - Universal Hollywood Drive / Coral Drive / Hotel Drive
- Traditional parallel bar or continental style pedestrian crosswalks with varying widths of between approximately 10 feet and 12 feet are provided at the following intersections in the direct vicinity of the Project Site:⁸
 - Sheraton Drive / Universal Hollywood Drive
 - Universal Hollywood Drive / Hilton Driveway
 - Universal Hollywood Drive / Coral Drive / Hotel Drive
- A pedestrian bridge (Skybridge) over Lankershim Boulevard provides safe and convenient pedestrian access surrounding the Metro B (Red) Line Universal City/Studio City Station and the Universal Studios Tram Stop.
- Pedestrian crossing signals and push buttons are presently included as part of the traffic signal controls at the nearby signalized intersections that are noted in Figure IV.K-2. Additionally, a skybridge across Coral Drive is located approximately 300 feet south of the Universal Hollywood Drive / Hilton Driveway intersection. This skybridge allows for safe pedestrian crossing across Coral Drive without potential conflict with vehicular traffic.

⁷ City of Los Angeles. 2010. 2010 Bicycle Plan. Bicycle Plan - 2010.pdf (lacity.org) Accessed September 20, 2022.

⁸ Continental crosswalks are high-visibility roadway markings using thick vertical striping.



D:\80143.00 - Universal Hilton EIR\05 Graphics-GIS-Modeling\DEIR

SOURCE: ESA, 2022

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Figure IV.K-2
Pedestrian Facilities in Project Vicinity

(4) Vision Zero

No roads within the direct vicinity of the Project Site (e.g., within 0.25 mile) have been identified within the HIN.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the City's CEQA Transportation Thresholds,⁹ a project would have a significant impact related to transportation if it would:

- a) *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***
- b) *Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***
- c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***
- d) *Result in inadequate emergency access?***

In analyzing potential transportation impacts, the City has adopted the thresholds included in its CEQA Transportation Thresholds, which are the same as the impact questions included in Appendix G of the CEQA Guidelines.¹⁰ The City's CEQA Transportation Thresholds, along with the 2022 TAG, supersede the guidance and factors included the City's 2006 L.A. CEQA Thresholds Guide. The impact criteria in the TAG are discussed below. With regard to emergency access, neither the 2022 TAG nor the City's CEQA Transportation Thresholds include specific factors or thresholds for determining potentially significant impacts. The methodology discussed below describes the City's standard considerations when assessing emergency access impacts.

b) Methodology

(1) Requirements for Transportation Assessments

The analysis of potential transportation impacts considers potential Project effects related to (1) potential conflicts with transportation-related plans, ordinances, or policies; (2) a

⁹ City of Los Angeles, California Environmental Quality Act (CEQA) Transportation Thresholds, July 2020.

¹⁰ On July 30, 2019, the City adopted the CEQA Transportation Analysis Guidelines Update, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluating criteria for determining impacts.

substantial increase in VMT; (3) increased hazards due to a geometric design feature or incompatible use; and (4) emergency access.

The scope of the analysis was developed in consultation with LADOT. The CEQA Transportation Analysis Guidelines Update (adopted February 2019) establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT updated the TAG in 2022. The subsections below describe the methodologies to evaluate each significance threshold.

(2) Review for Conflicts with Plans, Programs, Ordinances, or Policies

As previously stated, the 2022 TAG requires projects to be reviewed for conflicts with transportation-related plans, programs, ordinances, or policies. For projects meeting the screening criteria set forth in Section 2.1.2 of the 2022 TAG, the analysis addresses whether the Project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The focus is on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction in VMT.

The threshold test is to assess whether a project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities) that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. A project that does not implement a particular program, plan, policy, or ordinance would not necessarily result in a conflict or an impact. Many of these programs must be implemented by the City itself over time and over a broad area, and the intention of this threshold test is to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans, and policies. The Project would result in a conflict if it would preclude the City from implementing adopted transportation-related programs, plans and policies. Furthermore, if a conflict is identified in association with the Project, under CEQA, it would only equate to a significant impact if precluding implementation of a given program, plan and policy would foreseeably result in a physical impact on the environment.¹¹

Regarding cumulative impacts, each of the plans, ordinances, and policies are reviewed to assess potential conflicts that may result from the Project in combination with other development projects in the Project area. The analysis considers whether there would be a significant impact to the environment to which both the Project and other projects contribute. For instance, a cumulative impact could occur if the Project, as well as other future development projects located on the same block, were to preclude the City's ability

¹¹ The rule of general plan consistency is that the project must at least be compatible with the objectives and policies of the general plan. See *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182].

to serve transportation user needs as defined by the City's transportation policy framework.¹²

(3) Vehicle Miles Traveled

(a) VMT Impact Thresholds

Per the 2022 TAG, different VMT significance thresholds have been established for each Area Planning Commission (APC) boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. The City's significance thresholds (i.e., provided on a daily household VMT per capita basis and a daily work VMT per employee basis) for each of the seven APC boundary areas are presented in **Table IV.K-2, VMT Impact Criteria (15 Percent Below APC Average)**. As the Project Site is located within the South Valley APC boundary area, the VMT impact criteria (i.e., 15 percent below the APC average) applicable to the Project is 11.6 Daily Work VMT per Employee.

TABLE IV.K-2
VMT IMPACT CRITERIA (15 PERCENT BELOW APC AVERAGE)

Area Planning Commission (APC)	Daily Household VMT Per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

SOURCE: LADOT, *Transportation Assessment Guidelines*, Table 2.2-1, 2022.

Section 2.2.4 of the 2022 TAG provides screening criteria and thresholds of significance used to determine if other types of land uses occasionally reviewed by LADOT (including hotel projects) would result in significant impacts as it relates to VMT.

For Hotel and Motel Uses, VMT impacts of both employee trips and visitor/guest trips be evaluated, and a separate impact threshold should be applied to each trip type.

The employee trips should be treated similar to those for office uses where the hotel/motel project would result in an impact if it generates work VMT per employee exceeding 15

¹² LADOT Transportation Assessment Guidelines, August 2022, p. 2-3.

percent below the existing average work VMT per employee for the APC in which the project is located.

To evaluate the potential VMT impacts of visitor/guest trips, the analysis should screen out visitor/guest trips from a quantitative analysis where those hotels/motels would be considered to meet a localized demand for visitor/guest travel. Hotel and motel uses could be shown to not contribute to significant visitor/guest trips if they are proposed in locations that are closer to common or desired destinations for guests and visitors than other existing hotel and motel uses and, therefore, result in shorter overall visitor trips that are expected without the project. The conclusion that hotel and motel uses would not result in a significant VMT impact from visitor/guest trips would be more substantiated where the hotel/motel project includes TDM measures that actively promote transit and bike share services to the hotel/motel patrons.

(b) VMT Analysis Methodology

For the purpose of screening the VMT, the Project's daily VMT was estimated using the City's VMT Calculator tool or the City's Travel Demand Forecasting (TDF) model. TDM strategies were not considered for the purpose of screening in order to see if the Project meets any screening criteria prior to implementation on the sole basis of its design. Per the 2022 TAG, daily VMT for existing land uses present on the Project Site or terminated land uses that meet the criteria for trip credits description in the trip generation methodology discussion (refer to Subsection 3.3.4.1 of the 2022 TAG) can be estimated using the City VMT Calculator tool and subtracted from the Project's daily VMT to determine the net increase in daily VMT.

(i) Trip Generation

The updated trip generation forecast has been prepared utilizing rates provided in the ITE *Trip Generation Manual*, 11th Edition. The following trip generation rates were used to forecast the traffic volumes expected to be generated by the Project:

- Hotel: ITE Land Use Code 310 (Hotel) trip generation average rates were used to forecast the traffic volumes expected to be generated by the hotel component of the Project (including the Project's Meeting Room Addition).
- Rooftop Restaurant: ITE Land Use Code 931 (Fine Dining Restaurant) trip generation average rates were used to forecast the traffic volumes expected to be generated by the Rooftop Restaurant component of the Project.
- Level 3 and Poolside Restaurants: ITE Land Use Code 932 (High-Turnover [Sit-Down] Restaurant) trip generation average rates were used to forecast the traffic volumes expected to be generated by the Level 3 Restaurant and the Basement Level pool food component of the Project.
- Level 4 Bar and Lounge: ITE Land Use Code 975 (Drinking Place) trip generation average rates were used to forecast the traffic volumes expected to be generated by the Level 4 Bar and Lounge component of the Project.

- Spa: ITE Land Use Code 492 (Health/Fitness Club) trip generation average rates were used to forecast the traffic volumes expected to be generated by the spa component of the Project.

In addition to the trip generation forecasts for the Project (which are essentially an estimate of the number of vehicles that are expected to enter and exit the Project Site access points), a forecast was also made of the transit and walk-in trips that would be generated by the Project in lieu of trips by the private automobile. The Project Site is within a Transit Priority Area (TPA) and High Quality Transit Area (HQTa) and is currently served by many local lines and regional/commuter lines via stops located within convenient walking distance along Universal Hollywood Drive and Lankershim Boulevard. These transit lines include: Metro Local Lines 155, 222, 224, and 240, Metro B Line (Red), and the BurbankBus Pink Route. The walk-in trip reduction accounts for walk-in patronage both from within the Project, as well as other surrounding land uses, specifically Universal Studios Hollywood and Universal CityWalk, located immediately east of the Project Site. Consistent with the 2022 TAG and approved by LADOT (Appendix A of the 2022 TA Addendum), a transit and walk-in adjustment of 25 percent, the maximum reduction permitted per the TAG, has been utilized due to the Project's proximity to nearby transit lines and pedestrian attractors.

(ii) Mixed-Use Development Methodology

Lastly, an internal capture adjustment has been applied for the Project to account for synergistic effects of the planned land use mix. Internal capture trips are those trips made internal to the site between land uses in a mixed or multi-use development in which land uses tend to interact and, thus, attract a portion of each other's trip generation. An internal capture adjustment of 25 percent has been utilized to account for the interactions between the hotel and the spa, Level 3 Restaurant, Poolside Restaurant, and Level 4 Bar and Lounge uses. An internal capture adjustment of 15 percent has been utilized to account for the interactions between the hotel and the Rooftop Restaurant. A greater internal capture adjustment has been utilized for the interactions between the hotel and the spa, Level 3 Restaurant, Poolside Restaurant, and Level 4 Bar and Lounge uses since these uses are expected to be utilized primarily by hotel guests, while the Rooftop Restaurant is expected to be utilized by a greater percentage of non-hotel guests when compared to the other uses provided within the Project.

(iii) Transportation Demand Management

A TDM Program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a typical TDM Program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management. The Project is committing to implementing four TDM strategies as a Project Design Feature (PDF) (see Project Design Features within Section c), including transit subsidies, promotions and marketing, bicycle parking above the LAMC requirements, and

access to secure bicycle parking and showers. These strategies were included as part of the VMT analysis for the Project.

(iv) Cumulative Analysis

The cumulative analysis considers both short- and long-term Project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis described above. Long-term, or cumulative, effects are determined through a consistency check with the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects that are consistent with the RTP/SCS in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less-than-significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. As the Project Site is in a location where the RTP/SCS includes development, this does not apply to the Project. However, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per employee) in the project impact analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of the RTP/SCS.

(4) Hazardous Geometric Design Features

For vehicle, bicycle and pedestrian safety impacts, a review is conducted for all Project access points, internal circulation, and parking access from an operational and safety perspective (e.g., turning radii, driveway queuing, line-of-sight for turns into and out of project driveway[s]). Where Project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), the analysis considers operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result. Project access plans are reviewed in light of commonly-accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant.¹³ The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at Project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the Project Site, and the visibility of cars to pedestrians and bicyclists.

¹³ One example of traffic engineering design standards includes, but is not limited to, Section 321 of LADOT's Manual of Policies and Procedures, which provides guidance on driveway design.

- The type of bicycle facilities the Project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the Project Site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.
- The Project location or Project-related changes to the public right-of-way relative to proximity to the HIN or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

(a) *Freeway Safety Analysis*

In addition, in accordance with LADOT's interim guidance on freeway safety analysis issued in May 2020, a freeway safety analysis was conducted to evaluate whether the addition of Project traffic could cause or lengthen an off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.¹⁴

The interim guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As the Project would add 25 or more trips to a nearby freeway off-ramp in either the weekday peak-hour, a freeway safety analysis was prepared for the Project based on the *Highway Capacity Manual*¹⁵ (HCM) operational analysis methodology pursuant to the 2022 TAG. The Project is anticipated to add 25 or more trips to one off-ramp, the U.S. 101 southbound off-ramp at Lankershim Boulevard.

A project would result in a significant impact at such a ramp if each of the following three criteria were met:

1. Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes.
2. The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
3. The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 miles per hour (mph).

¹⁴ City of Los Angeles Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, May 2020.

¹⁵ *Highway Capacity Manual 6th Edition*, Transportation Research Board of the National Academies of Sciences-Engineering-Medicine, 2016.

Pursuant to the 2022 TAG, the HCM methodologies for signalized and unsignalized intersections were utilized to calculate vehicle queuing. The operational analysis reports the 95th percentile queues (in feet) for all approaches for the off-ramp intersection. The 95th percentile queue is the maximum back of queue with 95th percentile traffic volumes. The HCM 6th Edition methodology worksheets report queues in number of vehicles. As such, an average vehicle length of 25 feet, which includes the length of the vehicle and spacing between vehicles, was assumed for analysis purposes. The reported queues, therefore, represent the calculated maximum back of queue in feet.

The assessment of the off-ramps includes a review of the vehicle queue length as compared to the total available queueing capacity of the ramp to determine whether the vehicle queue would extend beyond the length of the ramp onto the mainline. To this end, the queueing analysis looks at two separate components of the ramp capacity: the length of each approach lane to the intersection, and the remaining length of the ramp, behind any approach lane delineation lines, to the point where the ramp diverges from the freeway mainline. The queue may exceed the striped length of a given approach lane, as long as there is sufficient additional queueing capacity on the ramp, and the queue does not spill over onto the mainline. The HCM methodology worksheets for the analyzed off-ramp are contained in Appendix E of the 2023 TA Addendum (Appendix K-4).

If a potential safety issue is identified, a project should consider preferred corrective measures, including TDM strategies, to reduce the project's trip generation, investments in active transportation or transit system infrastructure to reduce the project's trip generation, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp, to alleviate this potential safety issue. Any physical change to the ramp would have to demonstrate substantial safety benefits and not be a VMT-inducing improvement or result in environmental issues.

(5) Emergency Access

For emergency access impacts, a review is conducted for Project access points, internal circulation, and parking access to determine if adequate emergency access is provided. The analysis considers the physical conditions of the Project Site and surrounding area, such as curves, slopes, walls, landscaping or other barriers. Also, a determination is made as to whether the Project would preclude adequate emergency access within the adjacent roadway network.

c) Project Design Features

The following Project Design Features are applicable to the Project.

TRAF-PDF-1: Transportation Demand Management Program. The Applicant will implement a TDM Program for the Hotel Expansion Building and Meeting Room Addition aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The Existing Hotel Building currently implements these four

strategies and will continue to do so upon completion of the Project. The strategies in the TDM Program will include:

- Transit Subsidies: Transit fare subsidies will be proactively offered to each employee at least once annually for a minimum of five years. At the time of initial opening, the Project will offer a daily transit subsidy to all employees. This TDM strategy is currently implemented by the Existing Hotel Building and will continue to be upon completion of the Project.
- Promotions and Marketing: The Project will utilize promotional and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that employees can choose to read at their own leisure. This TDM strategy is currently implemented by the Existing Hotel Building and will continue to be upon completion of the Project.
- Include Bicycle Parking per the Los Angeles Municipal Code: Table 12.21 A.16(a)(2) in the LAMC provides the required short-term and long-term bicycle parking spaces for the Project. The Project will provide the LAMC-required number of short-term and long-term bicycle parking spaces on-site.

The bicycle parking ratios for both short term and long term are as follows:

- Hotel (395 guestrooms): 1 space per 20 guestrooms (20 spaces);
- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);
- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces¹⁶);
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.): 1 space per 10,000 s.f. (2 spaces¹⁷).

The long-term bicycle parking ratios are as follows:

- Hotel (395 guestrooms): 1 space per 10 guestrooms (40 spaces);
- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);

¹⁶ While the calculation would yield a requirement of one short-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two short-term bicycle parking spaces are required for a bar/lounge use.

¹⁷ While the calculation would yield a requirement of one short-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two short-term bicycle parking spaces are required for all other commercial uses not identified in Table 12.21 A.16(a)(2), including the Project's Meeting Room Addition.

- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces¹⁸)
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.) 1 space per 10,000 s.f. (2 spaces¹⁹).

Based on the above, the Project is required to provide 54 short-term and 54 long-term bicycle parking spaces, for a total of 108 bicycle parking spaces. The Project will provide 54 short-term and 64 long-term bicycle parking spaces (10 more than required by the LAMC).

- Include Secure Bicycle Parking and Showers: This strategy involves implementation of additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at destinations. This strategy applies to projects that include bicycle parking on-site per the LAMC. As noted above, the long-term bicycle parking would be secured from the general public in accordance with LAMC Section 12.21 A.16(d)(2). In addition, the Project will ensure showers will be provided for employees within the Existing Hotel Building in accordance with LAMC Section 91.6307.

TRAF-PDF-2: Construction Management Plan. Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, traffic management strategies, detour plans, haul routes and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during Project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

¹⁸ While the calculation would yield a requirement of one long-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two long-term bicycle parking spaces are required for a bar/lounge use.

¹⁹ While the calculation would yield a requirement of one long-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two long-term bicycle parking spaces are required for all other commercial uses not identified in Table 12.21 A.16(a)(2), including the Project's Meeting Room Addition.

- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient watering of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

d) Analysis of Project Impacts

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

(1) Impact Analysis

The 2022 TAG Guidelines, Table 2.1-1, *City Documents that Establish Regulatory Framework*, includes a list of City plans, policies, programs, ordinances and standards that should be consulted to help identify potential conflicts with projects undergoing CEQA review. Also, Attachment D, Plan Consistency Worksheet, of the 2022 TAG includes screening questions for determining Project applicability to relevant plans, policies, and programs, in order to assess whether the Project would preclude their implementation. The questions and responses to each screening question is included in Attachment D of the 2020 TA (Appendix K-1). Upon review of Table 2.1-1 and the responses to the screening questions, the following plans, policies, programs were determined relevant to the Project and are analyzed in this EIR section: Mobility Plan 2035, the Community Plan, LADOT MPP, Vision Zero, Plan for a Healthy Los Angeles, Citywide Design Guidelines, Mobility Hub Guide, and the Walkability Checklist.

The analysis below includes a consistency analysis with the plans, policies and programs determined to be applicable to the Project.

(a) *Mobility Plan 2035*

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. **Table IV.K-3, *Consistency of the Project With Applicable Policies and Programs of Mobility Plan 2035***, provides determinations of whether the Project would conflict with any of the applicable policies and programs in Mobility Plan 2035. Attachment D of the 2020 TA provides a *Plans, Policies and Programs Consistency Worksheet* with responses to the threshold questions. As shown therein, the Project would not conflict with any of the applicable policies and programs.

Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or programs in Mobility Plan 2035 adopted to protect the environment and reduce VMT.

TABLE IV.K-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF
MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
2.1 – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	No Conflict. The Project would not involve making any dedications or improvements to the public right-of-way. The Project would not alter adjacent streets or the right-of-way in a manner that would preclude, or conflict with, future changes by various City Departments. Therefore, the Project would not conflict with this policy.
2.3 – Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	No Conflict. The Project would not involve making any changes within the public right-of-way and would not alter pedestrian infrastructure or the right-of-way in a manner that would preclude, or conflict with, future changes by various City Departments. The Project would prioritize pedestrian access and connectivity. Pedestrian access to Universal Studios Hollywood and Universal CityWalk would remain similar to existing conditions. Guests would walk and/or take complimentary Universal Studios Hotel Shuttle to the Universal Studios Hollywood and Universal CityWalk. Currently, guests who choose to walk would take the existing sidewalk/pathway along the northern boundary of the Project Site to Universal Hollywood Drive, then use the signalized crosswalk on Hotel Drive to proceed to the pedestrian bridge that crosses over Universal Hollywood Drive to Universal CityWalk and/or Universal Studios Hollywood. There are also existing ADA ramps present at the stop-controlled crosswalk along the

TABLE IV.K-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF
MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
2.10 – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.	Project Site driveway and Universal Hollywood Drive. Therefore, the Project would not conflict with this policy. No Conflict. All loading activities would continue to occur off-street and internal to the Project Site. Loading activities associated with service and delivery operations, trash collection, and waste management for the Project would occur within the Existing Ancillary Hotel Building, similar to existing conditions. The loading dock would continue to be accessed by the service road along the east side of the Project Site. Therefore, the Project would not conflict with this policy.
3.2 – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	No Conflict. The Project would not involve making any changes within the public right-of-way and would not alter existing ADA infrastructure or the right-of-way in a manner that would preclude or conflict future changes by various City Departments. Therefore, the Project would not conflict with this policy.
3.8 – Bicycle Parking, Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	No Conflict. The Project is required to provide 54 short-term and 54 long-term bicycle parking spaces in accordance with the LAMC. The Project would provide bicycle parking spaces in excess of the LAMC-required number of short-term and long-term bicycle parking spaces. Secure bicycle parking would be provided within the on-site parking garage. Showers and changing rooms within the Existing Hotel Building will be provided for all employees commuting to work by bicycle for Project. Therefore, the Project would not conflict with this policy.
4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.	No Conflict. The Project would utilize TDM strategies as part of Project Design Feature TRAF-PDF-1, including transit subsidies and promotions and marketing. The Project would also include bike parking above the requirements of the LAMC, secure bike parking, and access to showers to encourage the use of alternative modes of transportation. The Applicant would comply with existing applicable City ordinances (e.g., the City's existing TDM Ordinance, referred to in LAMC Section 12.26 J). Therefore, the Project would not conflict with this policy.

TABLE IV.K-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF
MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
4.13 – Parking and Land Use Management. Balance on-street and off-street parking supply with other transportation and land use objectives.	No Conflict. The Project would provide 464 new vehicle parking spaces for a total of 1,116 vehicle parking spaces on-site upon completion of the Project. The Project Site would continue to provide vehicle parking spaces in accordance with the LAMC. Additionally, the Project would provide bicycle parking spaces in excess of the LAMC-required number of short-term and long-term bicycle parking spaces. Moreover, the Project is located in a TPA and is within convenient walking distance to public transit routes along Lankershim Boulevard, including the Metro B (Red) Line. Therefore, the Project would not conflict with this policy.
Program PL.1 - Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.	No Conflict. Driveway access to the Project Site is provided from Universal Hollywood Drive, a non-arterial Private Street, which would minimize interference with pedestrian access and vehicular movement by allowing visitors to drive directly to the parking garage or valet, rather than creating more pedestrian traffic from off-site parking. Therefore, the Project would not conflict with this policy.

SOURCE: ESA, 2023.

(b) *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan*

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles, including the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) area in which the Project is located. Transportation-related objectives, policies, and programs are provided in Chapter III, *Land Use Plan Policies and Programs*.

Table IV.K-4, Consistency of the Project With Applicable Policies and Programs of the Community Plan, provides determinations of whether the Project would conflict with any of the applicable policies and programs in the Community Plan. As shown therein, the Project would not conflict with any of the applicable policies and programs.

TABLE IV.K-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF THE
COMMUNITY PLAN

Goal/Objective/Policy	Would the Project Conflict?
Objective 10-2: To increase the work trips and non-work trips made on public transit.	No Conflict. The Project is located in a TPA and is within convenient walking distance to many public transit lines along Lankershim Boulevard, such as the Metro Red Line Universal City/Studio City Station and the Metro Local 155 and 244 bus stops. As described in Project Design Feature TRAF-PDF-1, the Project will offer all employees a daily transit subsidy to encourage travel to and from the Project Site by public transit. Therefore, the Project would not conflict with this objective.
Goal 11: Encourage alternative modes of transportation to the use of single occupancy vehicles (SOV) in order to reduce vehicle trips.	No Conflict. The Project would implement a TDM Program as Project Design Feature TRAF-PDF-1. The TDM Program would include TDM strategies such as the provision of transit subsidies and promotions and marketing. The Project would also include bike parking above the requirements of the LAMC, secure bike parking, and access to showers to encourage the use of alternative modes of transportation. The Applicant would comply with existing applicable City ordinances (e.g., the City's existing TDM Ordinance, referred to in LAMC Section 12.26 J). Further, the Project is within convenient walking distance to Universal Studios Hollywood and Universal CityWalk. Therefore, the Project would not conflict with this goal, objective, and policy.
Objective 11-1: To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.	
Policy 11-1.1: Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, walking, bicycles, etc.).	
Objective 13-1: To the extent feasible and consistent with the Mobility Plan's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable levels of service (LOS) and insure that necessary road access and street improvements are provided to accommodate traffic generated by new development.	No Conflict. Existing vehicular access to the Project Site would be maintained and would be adequate to accommodate new traffic from the Project without disturbance to existing flow based on evaluation of the trip generation forecasts as per the 2020 TA and 2023 TA Addendum. Therefore, the Project would not conflict with this objective and policy.
Policy 13-1.4: New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking.	

TABLE IV.K-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF THE
COMMUNITY PLAN

Goal/Objective/Policy	Would the Project Conflict?
Goal 14: A system of safe, efficient, and attractive bicycle, pedestrian, and equestrian facilities. Objective 14-1: To promote an adequate system of safe bikeways for commuter, school, and recreational use. Policy 14-1.2: Encourage the provision of showers, changing rooms, and bicycle storage at new and existing non-residential developments and public places. Objective 14-2: To promote pedestrian oriented areas and pedestrian routes for commuter, school, recreational use, economic revitalization, and access to transit facilities.	No Conflict. The Project would promote bicycling as a viable mode of transportation for employees by providing bicycle parking above the requirements of the LAMC and would also provide secure bicycle parking and access to showers and changing rooms for employees commuting to work by bicycle. The Project would provide promotional and marketing materials to employees to educate and encourage alternative modes of travel to and from work. The Project proposes no changes along the public right-of-way, and the existing public pedestrian facilities along Universal Hollywood Drive would be maintained. Therefore, the Project would not conflict with this goal, objectives, and policies.
Goal 15: A sufficient system of well-designed and convenient on-street parking and off-street parking facilities throughout the Plan Area. Objective 15-1: To provide parking in appropriate locations in accord with Citywide standards and community needs. Policy 15-1.1: Consolidate parking where appropriate, to minimize the number of ingress and egress points onto arterials. Policy 15-1.3: New parking lots and new parking garages shall be developed in accordance with design standards.	No Conflict. A total of 464 new vehicle parking spaces would be provided on-site in accordance with the LAMC, and existing vehicle access to the Project's on-site parking would be maintained. The expanded on-site parking garage would be developed in accordance with City standards. Therefore, the Project would not conflict with this goal, objective, and policy. Vehicular access to the Project Site would continue to be provided via the existing driveway along the west side of Universal Hollywood Drive that leads to an internal roadway along the north and west perimeter of the Project Site. Additional curb cuts along roadways bordering the Project Site are not proposed as part of the Project. Therefore, the Project would not conflict with this policy.

SOURCE: ESA, 2023.

(c) *LADOT Manual of Policies and Procedures*

The LADOT MPP Section 321, Driveway Design, includes driveway design standards to minimize adverse effects on street traffic. The Project Site has frontage along Universal Hollywood Drive, which is designated as a Private Street under the Mobility Plan 2035 Street Standards Plan, and Hotel Drive, a Private Drive within the County of Los Angeles' Universal Studios Specific Plan that is not included within the Mobility Plan 2035 Street Standards Plan. Vehicular access to the Project Site would continue to be provided via

the existing driveway along the west side of Universal Hollywood Drive. No additional driveways along the public right-of-way are proposed as part of the Project. While LADOT MPP Section 321 does not provide guidance for driveway placement along Private Streets, it is noted that the existing driveway is located approximately 150 feet north of the signalized Universal Hollywood Drive/Coral Drive/Hotel Drive intersection. However, LADOT MPP Section 321 states that on a street classified as a Collector or Local, driveways should not be placed within 75 feet of the adjacent street (for a project with frontage greater than 250 feet). The Project would comply with this requirement so as to not adversely affect traffic at the nearby Universal Hollywood Drive/Coral Drive/Hotel Drive intersection. Based on the above, the Project would not conflict with the LADOT MPP.

(d) *Vision Zero*

Vision Zero is a plan that strives to eliminate traffic-related deaths in Los Angeles by 2025 through strategies, such as modifying streets to better serve vulnerable road users. Projects located in the HIN should make improvements or fund them. Universal Hollywood Drive or other roadways within the immediate vicinity of the Project Site are not located within the HIN.²⁰ Therefore, the Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way along Universal Hollywood Drive or other roadways within the immediate vicinity of the Project Site.

(e) *Plan for a Healthy Los Angeles*

The Project supports the transportation-related goals listed in the Plan for a Healthy Los Angeles. The Project is designed in a manner that would allow pedestrian access between the Project Site and the nearby Universal Studios Hollywood and Universal CityWalk attractions. Guests would utilize the existing pedestrian pathway located on the northern edge of the Project Site and cross the existing stop-controlled intersection between Universal Hollywood Drive and the Project Site driveway. Guests would then proceed down Universal Hollywood Drive to Hotel Drive and the pedestrian bridge as under existing conditions. The Project would provide more than the LAMC-required number of bicycle parking spaces (108 required and 118 provided) and would provide access to end-of-trip facilities for use by employees in the form of long-term bicycle parking secured from the general public, and showers within the Existing Hotel Building would be available to employees of the Project to use. To reduce dependence on single-occupancy vehicles, all employees would be offered a daily transit subsidy to encourage travel to and from the Project Site by means other than vehicles. Therefore, the Project would not conflict with, limit, or preclude the City's ability to implement mobility-related programs and policies in furtherance of the Plan for Healthy Los Angeles.

²⁰ City of Los Angeles Department of Transportation. 2018. High Injury Network. High-Injury Network (2018) | High-Injury Network (2018) | City of Los Angeles Hub (lacity.org) Accessed September 20, 2022.

(f) *Citywide Design Guidelines*

The Citywide Design Guidelines identifies urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The design guidelines are organized around Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Guideline 2 of the Citywide Design Guidelines recommends incorporating vehicle access such that it does not discourage and/or inhibit the pedestrian experience, in accordance with the Site Planning Best Practices. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting 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 prioritizes pedestrian access first. Vehicular access to the Project Site's existing parking garage, which would be expanded as part of the Project, is provided internal to the Project Site and away from the public right-of way. The Project Site is not located on a corner lot. There is a walkway along the north side of the existing internal driveway that provides pedestrian access to Universal Hollywood Drive, which in turn provides pedestrian access to off-site attractions. The existing walkway involves crossing the internal Hotel driveway twice (back and forth) to get to the same access points to the attractions from Universal Hollywood Drive; however there are currently crosswalks and ADA ramps at the existing crossing points. Therefore, no safety hazard exists under existing conditions or would occur under the Project. The Guideline also calls to minimize both the number of driveway entrances and overall driveway widths. The existing curb cut along Universal Hollywood Drive would be maintained, and the Project would not propose the addition of new curb cuts along the public right-of-way. The existing curb cut along Universal Hollywood Drive is located midblock and away from nearby intersections. Specifically, the Universal Hollywood Drive / Coral Drive / Hotel Drive intersection is located approximately 150 feet south of the existing Hilton Driveway curb cut. The Sheraton Drive / Universal Hollywood Drive intersection is located approximately 400 feet northwest of the existing Hilton Driveway curb cut. This is consistent with Guideline 2 which specifies that vehicular access must be oriented as far from street intersections as possible.

The Project does not propose any drive-through elements. The Project's drop-off/pick-up areas would be located internal to the Project Site and away from the public right-of-way. Hotel guests and visitors choosing to utilize the Hotel's valet service would drop-off their vehicles at the valet area on Level 4. The South Plaza would also continue to serve as the primary rideshare (i.e., Uber/Lyft, airport shuttle, etc.) pick-up/drop-off location. Additional valet stations may be made available on Level 4 in the North Plaza or on Level 3 within the expanded parking garage during high traffic volume special events.

Loading activities associated with service and delivery operations, trash collection, and waste management for the Project would occur within the Existing Ancillary Hotel Building and away from on-site pedestrian and vehicular circulation. The loading dock would

continue to be accessed by the service road along the east side of the Project Site. The service road and loading dock are located away from areas that are used for public parking and public entrances.

Based on the above, the Project would not conflict with the Citywide Design Guidelines.

(g) Mobility Hubs Reader's Guide

The Mobility Hubs Reader's Guide specifically focuses on enhancing bicycle connections, providing vehicle sharing services, improving bus infrastructure, providing real-time transit and wayfinding information, and enhancing walkability and pedestrian connections. The Project would incorporate several components of the Mobility Hubs Reader's Guide, including LAMC-required short-term and long-term bicycle parking that both facilitate and encourage employees to bicycle to and from the Project Site. Additionally, the Project would ensure showers and changing rooms in the Existing Hotel Building are available for all employees. Further, as part of the Project's TDM Program (TRAF-PDF-1), the Project would support strategies to encourage public transit such as offering all employees a daily transit subsidy to encourage travel by public transit to and from the Project Site, and utilizing promotional and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices. Based on the above, the Project would not conflict with the Mobility Hubs Reader's Guide.

(h) Walkability Checklist

The Project would result in the retention of all sidewalks and curb ramps along the Project Site's Universal Hollywood Drive frontage. The Project would not add additional curb cuts along the public right-of-way in order to provide a continuous walkway that ensures a safe pedestrian connection between the Project Site and the nearby Universal Studios Hollywood and Universal CityWalk attractions by avoiding any conflict with motorists accessing the Project Site. The existing walkway along the north side of the existing internal driveway would continue to provide access to Universal Hollywood Drive, which in turn provides access to off-site attractions, including ADA ramps at the crosswalk for the Project Site driveway and Universal Hollywood Drive. Pedestrian circulation would remain the same as under existing conditions, which does provide for continuous pedestrian access to and from the Project Site. Based on the above, the Project would not conflict with the Walkability Checklist.

Based on the above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to facilitate mobility through alternatives to single passenger vehicles and reduce VMT. Therefore, Project impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As explained in Subsection 3.b.2., *Methodology*, above, the City's VMT Calculator (Version 1.3) was used to determine the Project's VMT per employee and daily vehicle trips based on Project characteristics, such as land uses, land use quantities, and TDM measures that are included as part of the Project (see Project Design Feature TRAF-PDF-1). The Project, with the inclusion of the Project Design Features, is estimated to generate a total of 4,309 daily vehicle trips.

As estimated by the VMT Calculator, the Project would generate 8.8 daily work VMT per employee, which is below the threshold of significance for the South Valley APC of 11.6 daily work VMT per employee. It should be noted that the Project would incorporate Project Design Feature TRAF-PDF-1 (TDM Program), which includes TDM strategies. A TDM Program can be considered as a Project Design Feature if no VMT impact would result without consideration of the associated TDM strategies. Accordingly, without consideration of the TDM strategies, the Project would generate a total of 4,902 daily vehicle trips and generate 10.0 daily work VMT per employee, which would still be below the threshold of significance for the South Valley APC of 11.6 daily work VMT per employee. The VMT Calculator outputs and additional details regarding the analysis are provided in Appendix D of the 2023 TA Addendum (Appendix K-4).

Per the 2022 TAG, the Project's quality restaurant, high-turnover restaurant, bar/lounge, and spa components, which total 25,397 square feet of floor area, are considered local-serving retail uses. As the Project's local-serving retail uses total less than 50,000 square feet, a no impact determination can be made as it relates to VMT for these uses.

Per the 2022 TAG, hotel uses, such as the Project, could be shown to not contribute to significant visitor/guest trips if they are proposed in locations that are closer to common or desired destinations for guests and visitors than other existing hotel uses and,

therefore, result in shorter overall visitor trips than are expected without the Project. The Project proposes to add 395 guestrooms across Universal Hollywood Drive from Universal Studios Hollywood and Universal CityWalk. The Existing Hotel Building is the closest hotel to the main entrance of Universal Studios Hollywood and Universal CityWalk. The only other hotel use within a similar proximity to these destinations is the Sheraton Universal, which abuts the Project Site to the west.

Given the Project's location relative to Universal Studios Hollywood and Universal CityWalk, it is reasonable to assume that many hotel visitors/guests would walk between these destinations and the Project Site. These walking trips would potentially replace current vehicle trips to these destinations by the visitors staying at off-site hotels. Additionally, the Existing Hotel Building provides a shuttle service which transports visitors and guests to and from Universal Studios Hollywood and Universal CityWalk, which would be available to future visitors and guests of the Project, thereby further reducing vehicle trips. Furthermore, the Project would provide 118 bicycle parking facilities for visitors and guests per the requirements of the LAMC. As the Project would provide 395 additional guestrooms within the direct vicinity of Universal Studios Hollywood and Universal CityWalk, would provide a shuttle transporting guests to and from these destinations, and would provide bicycle parking amenities, the Project would not contribute to significant visitor/guest trips, and, therefore, VMT impacts would be less than significant.

The Project would be below the City's work VMT significance thresholds and would not contribute to significant visitor/guest trips due to the Project's proximity to Universal Studios and Universal CityWalk, and would contain local-serving services of under 50,000 square feet. Therefore, Project impacts would be less than significant.

(2) Mitigation Measures

Impacts related to VMT were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Local Safety

As discussed in Subsection VI.6, *Impacts Found not to be Significant*, and in the Initial Study (**Appendix A**) of this Draft EIR, the roadways adjacent to the Project Site are part of an established urban roadway network and contain no sharp curves or dangerous intersections. While the Project would increase the number of vehicle trips to and from the Project Site, it would not construct new access driveways along the Project Site perimeter, significantly alter internal circulation patterns with the exception of the fire lane expansion/connection into the parking structure or create new pedestrian paths or stairways with the potential for substantial pedestrian/vehicle conflicts. Vehicles and pedestrians would continue to access the Project Site via the Project Site's existing driveway on Universal Hollywood Drive, which would not require modification to accommodate the proposed expansion. **Therefore, the Project would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, and impacts with respect to Threshold (c) as they relate to local safety would be less than significant. As such, no further analysis is required.**

(b) Freeway Safety

As noted previously, the interim guidance on freeway safety analysis requires freeway off-ramps where a proposed project adds 25 or more trips to any nearby freeway off-ramp serving the Project Site in either the morning or afternoon peak-hour.

The Project would add 29 trips to the US-101 Southbound Off-Ramp at Lankershim Boulevard during the weekday PM peak hour. The Project would not add 25 trips during the weekday AM and PM peak hours at other freeway off-ramps in the immediate vicinity of the Project Site.

As described in the 2023 TA Addendum, the change in queue length associated with the Project at the US-101 Freeway Southbound Off-Ramp right-turn approach under Future Cumulative with Project conditions increases by approximately 27 feet (i.e., just over one vehicle length) during the weekday PM peak hour (refer to Table 4, *Freeway Off-Ramp Queue Evaluation US-101 Freeway Southbound Off-Ramp at Lankershim Boulevard Weekday PM Peak Hour*, of the 2023 TA Addendum). This extension in queue length can be accommodated by the existing off-ramp and the vehicle queue would not extend onto the mainline. The change in queue length at the US-101 Freeway Southbound Off-Ramp right-turn approach would be less than the City's threshold of two vehicles, the Project would cause a less than significant freeway safety impact. There is no change in queue length associated with the Project's PM peak hour trips at the US-101 Freeway Southbound Off-Ramp's left-turn and through approaches. Therefore, the Project would cause a less-than-significant freeway safety impact.

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

(2) Mitigation Measures

Impacts related to hazardous design features were determined to be less than significant; therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to hazardous design features were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

As discussed in Subsection VI.6, *Impacts Found not to be Significant*, and in the Initial Study (Appendix A) of this Draft EIR, the Project Site is located in an established urban area that is well-served by a roadway network. As described above, implementation of Project Design Feature TRAF-PDF-2 will ensure access will remain unobstructed for land uses in proximity to the Project Site during Project construction and will require coordination with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary. Access to the Project Site would continue to be accommodated via the existing driveway entrance on Universal Hollywood Drive. Emergency vehicle access would also continue to be available via the existing service road along the eastern side of existing buildings. Furthermore, LADOT and the City's Bureau of Engineering would review all design plans to ensure that there are no Project traffic-related design features, which would impede access along Universal Hollywood Drive or with the Project vicinity. **Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant with respect to Threshold (d). As such, no further analysis is required.**

e) Cumulative Impacts

(1) Impact Analysis

The transportation analysis prepared in the 2023 TA Addendum utilized related projects lists provided by LADOT and the City of Los Angeles Department of City Planning (LADCP) within the Project vicinity as of August 2022. Per the 2022 TAG, related projects within a radius of one-quarter mile from the farthest outlying study intersection should be included. Therefore, related projects within a 1.15-mile radius (one-quarter mile past the farthest outlying study intersection, Barham Boulevard/W.C. Fields Drive – Cahuenga Boulevard East) of the Project Site were included. The list of related projects in the Project

area is presented in Chapter 3, *Environmental Setting*, of this Draft EIR, along with the location of the related projects in Figure III-1.

As discussed under Threshold (a), the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Each of the related projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be subject to individual discretionary review by the City for environmental impacts under CEQA, including a check for their consistency with applicable programs, plans, ordinances, and policies. Collectively, the Project and the related projects would add development and density in TPA/HQTA as an area with robust transit accessibility and high levels of pedestrian activity. As with the Project, related projects would be expected to support, include and/or enhance pedestrian, bicycle, and/or other alternative transportation facilities, increasing access to the City's multi-modal transportation network. The Project and the related projects would not preclude the City's ability to serve transportation needs as defined by the City's transportation policy framework. Therefore, the Project, in combination with the related projects, would not create inconsistencies or result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances. **As such, the Project's contribution to a cumulative impact related to a conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, would not be cumulatively considerable, and, therefore, cumulative impacts would be less than significant.**

According to the 2022 TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of the SCAG 2020-2045 RTP/SCS. As demonstrated in the Project-level VMT analysis above, the Project's daily work VMT per employee would be below the City's efficiency-based impact threshold, and, as such, the Project's contribution to cumulative transportation VMT impacts would not be considerable. Furthermore, as discussed in Section IV.A, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR, the Project would be consistent with, and would not conflict with, applicable 2020-2045 RTP/SCS actions and strategies to reduce GHG emissions associated with passenger vehicles and light duty trucks. **As such, the Project's contribution to a cumulative impact related to VMT would not be cumulatively considerable, and, therefore, cumulative impacts would be less than significant.**

With regard to design hazards, the Project would not result in a significant impact for local or freeway safety. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight

distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, modifications to access and circulation plans are largely confined to a project site and immediate surrounding area. No improvements that could significantly alter access and circulation in the immediate vicinity of the Project Site are proposed by either the Project or the related projects. Therefore, no cumulative impacts related to design hazards would occur. **Therefore, the Project's contribution to cumulative impacts associated with hazardous design conditions would not be considerable, and cumulative impacts would be less than significant.**

Based on the above, the Project's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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