

IV. Environmental Impact Analysis

M. Transportation

1. Introduction

This section analyzes the Project's potential impacts on transportation. The analysis is based on the Transportation Assessment for the Radford Studio Center Project (Transportation Assessment), dated March 2024 and updated January 2025, which was prepared for the Project by Gibson Transportation Consulting, Inc., and is included in its entirety in Appendix O.1 of this Draft EIR.¹

The Transportation Assessment was prepared pursuant to the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG), which was developed in July 2019 and updated in July 2020 and August 2022 to establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) Guidelines from the State of California that require transportation impacts to be evaluated based on vehicle miles traveled (VMT) rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment was approved by LADOT on August 9, 2024 and reaffirmed in January 2025. A copy of LADOT's approval of the Transportation Assessment is included in Appendix O.2 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Americans with Disabilities Act of 1990
- Complete Streets Act

¹ *Gibson Transportation Consulting, Inc., Transportation Assessment for the Radford Studio Center Project, Los Angeles, California, March 2024.*

- 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 Pass Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- LADOT Interim Guidance for Freeway Safety
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles
- Los Angeles River Design Guidelines

(1) Federal

(a) Americans with Disabilities Act of 1990

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

(2) State

(a) Complete Streets Act

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

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

(b) Assembly Bill 32 and Senate Bill 375

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

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

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

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

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

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

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

(c) California Vehicle Code

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

(d) Senate Bill 743

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

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

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

(e) *CEQA Guidelines Section 15064.3*

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit 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

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 20 minutes or less during the morning and afternoon peak commute periods.

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

VMT Calculator Version 1.4 (June 2023) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the current version of the TAG.

(3) Regional

(a) Southern California Association of Governments 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 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 toward 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, a 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:

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.*

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

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

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

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

(b) 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 (Community Plan) area. The Community Plan was adopted in 1998 and amended in 2016 as part of the Mobility Plan update. While an update to the Community Plan is under development, the current plan remains in effect. The Community Plan includes the following transportation and circulation objectives that are applicable to the Project. Additional applicable objectives and policies are discussed in Section IV.J, Land Use and Planning, of this Draft EIR.

Objective 10-1: To encourage improved local and express bus service through the community, and encourage bus routes to interface with freeways, high occupancy vehicle (HOV) facilities, and rail facilities.

Policy 10-1.1: Coordinate with the Metropolitan Transportation Authority (MTA) to improve local bus service to and within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass plan area.

Policy 10-1.2: Encourage the expansion wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled persons and the transit-dependent population.

Policy 10-1.3: Encourage the provision of safe, attractive and clearly identifiable transit stops with user friendly design amenities.

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

Policy 10-2.1: Develop an intermodal mass transportation plan to implement linkages to future mass transit service.

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., car pools, vanpools, buses, flex time, bicycles, and walking, etc.).

Policy 11-1.2: Encourage the use of Multiple-Occupancy Vehicle programs for shopping and other activities to reduce midday traffic.

Policy 11-1.3: Require that proposals for major new non-residential development projects include a submission of a TDM Plan to the City.

Policy 11-1.4: Support the provision of bicycle facilities in all new development.

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 [sic] that necessary road access and street improvements are provided to accommodate traffic generated by new development.

Policy 13-1.2: Street dedications shall be developed in accordance with standards and criteria contained in the Mobility Plan, an element of the General Plan and the City's Standard Street Dimensions, except where environmental issues and planning practices warrant alternate standards consistent with capacity requirements.

Policy 13-1.3: Discourage non-residential traffic flow for streets designed to serve residential areas only by the use of traffic control measures.

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

Objective 13-2: To insure [sic] that the location, intensity and timing of developed transportation infrastructure utilizing the City's streets standards.

Policy 13-2.2: Driveway access points onto arterial and collector streets should be limited in number and be located to insure the smooth and safe flow of vehicles and bicycles.

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

Policy 14-1.1: Assure that local bicycle facilities are identified and linked with facilities of neighboring areas of the City.

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 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 15-1.2: Consider new Citywide parking standards for areas around transit stations, designated centers and pedestrian oriented areas.

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 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

As discussed above, pursuant to CEQA Guidelines Section 15064.3 that implements SB 743, the City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in August 2022. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies, including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG has been developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.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.

⁵ LADOT, *Transportation Assessment Guidelines*.

(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 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.

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*.

(j) Los Angeles River Design Guidelines

The River Improvement Overlay (RIO) District is a special use district established by Ordinance Nos. 183,144 and 183,145 in August 2014 to support the goals of the Los Angeles River Revitalization Master Plan; contribute to the environmental and ecological health of the City's watersheds; establish a positive interface between river adjacent property and river parks and/or greenways; promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods; provide native habitat and support local species; provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; provide safe, convenient access to and circulation along the river; promote the river identity of river adjacent communities; and support the Low Impact Development Ordinance and the City's Irrigation Guidelines. The RIO District Ordinances establish landscaping, design criteria, and administrative review procedures for projects within the RIO District.⁷ The Los Angeles River Design Guidelines complement the Los Angeles River Revitalization Master Plan and builds on the original draft Los Angeles River Design Guidelines from July 2015.

b. Existing Conditions

Based on consultation with LADOT and the procedures and standards set forth in the TAG, the Project's study area (Study Area) analyzed in the Transportation Assessment extends beyond the typical 0.25-mile-radius and includes a total of 32 intersections, including 25 signalized intersections and seven unsignalized intersections, as listed in Table 2 of the Transportation Assessment. As illustrated in Figure 6 of the Transportation Assessment, the Study Area is generally bounded by Riverside Drive to the north, Tujunga Avenue to the east, Fryman Road to the south, and Whitsett Avenue to the west. The following discussion describes the key streets, pedestrian destinations, transportation facilities, and transit routes serving the Project Site, generally located within a 0.25-mile-radius, as illustrated in Figures 8 through 12 in the Transportation Assessment.

(1) Existing Street Systems and Public Transit

The existing street system in the Study Area consists of a regional roadway system, including freeways, arterials, and collector and local streets that provide regional, sub-regional, and local access and circulation within the Study Area.

⁷ City of Los Angeles Department of City Planning, *Zoning Information No. 2358, River Improvement Overlay District, Ordinance Nos. 183,144 and 183,145, revised January 12, 2015.*

(a) *Streets and Highways*

Listed below are the primary streets and highways that provide local and regional access to the Project Site:

- Whitsett Avenue is a designated Avenue II located approximately 0.75 miles west of the Project Site and travels in the north-west direction. It provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections. Unmetered parking with afternoon peak hour restrictions is generally available on the east side of the street within the Study Area.
- Laurel Canyon Boulevard is a designated Avenue I located approximately 0.25 miles west of the Project Site and travels in the north-south direction. It provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections and a center turn lane. Unmetered parking is generally available on both sides of the street within the Study Area. Laurel Canyon Boulevard provides a direct connection to US-101 via interchanges northwest of the Project Site.
- Radford Avenue is a designated Avenue II and travels in the north-south direction. Radford Avenue terminates at the south side of the Tujunga Wash and continues north of Moorpark Street. It is located on the western edge of the Project Site and provides two travel lanes, one lane in each direction. Unmetered parking is generally provided on both sides of the street within the Study Area.
- Colfax Avenue is a designated Avenue II located adjacent to a portion of the eastern boundary of the Project Site and travels in the north-south direction. It generally provides two to four travel lanes, one to two lanes in each direction, with left-turn lanes at intersections. Striped bicycle lanes and unmetered parking are generally provided on both sides of the street within the Study Area.
- Tujunga Avenue is a designated Avenue II located approximately 0.6 miles east of the Project Site and travels in the north-south direction. It provides two to four travel lanes, one to two lanes in each direction, with left-turn lanes at intersections and a center-turn lane south of Moorpark Street. Striped bicycle lanes and unmetered parking are generally provided on both sides of the street within the Study Area.
- Riverside Drive is a designated Avenue I located approximately 0.6 miles north of the Project Site and travels in the east-west direction. It provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections and a center-turn lane. Unmetered parking is generally available on both sides of the street within the Study Area.
- Landale Street is a designated Collector Street between Laurel Canyon Boulevard and Colfax Avenue and a designated Local Street west of Laurel Canyon Boulevard and east of Colfax Avenue. It is located approximately 900 feet north of the northern boundary of the Project Site and travels in the east-west direction.

It provides two travel lanes, one lane in each direction. Unmetered parking is generally available on both sides of the street within the Study Area.

- Sarah Street is a designated Local Street located approximately 0.3 miles north of the Project Site and travels in the east-west direction. It provides two travel lanes, one lane in each direction. Unmetered parking with peak hour restrictions is generally available on both sides of the street within the Study Area.
- Moorpark Street is a designated Avenue II located north of the Project Site and travels in the east-west direction. It provides four travel lanes, two lanes in each direction. Unmetered parking is generally available on both sides of the street except between Laurel Canyon Boulevard and Morella Avenue within the Study Area.
- Irvine Avenue is a designated Local Street and travels in the north-south direction. It is located approximately 0.2 miles east of the Project Site and provides two travel lanes, one lane in each direction. Unmetered parking is generally available within the Study Area.
- Woodbridge Street is a designated Local Street and travels in the east-west direction that terminates at Radford Avenue/the western boundary of the Project Site and continues east of Colfax Avenue. It provides two travel lanes, one lane in each direction. Unmetered parking is generally available within the Study Area.
- Ventura Boulevard is a designated Boulevard II located south of the Project Site and travels in the east-west direction. It provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections and a center-turn lane. Metered parking is generally available on both sides of the street within the Study Area.
- Ventura Place is a designated Local Street located southwest of the Project Site and travels in the northwest-southeast direction. It provides four travel lanes, two lanes in each direction, with right-turn and left-turn lanes at intersection termini at Laurel Canyon Boulevard and Ventura Boulevard. Metered parking is generally available on both sides of the street within the Study Area. Vehicle access to Ventura Place is restricted on Sundays between 6 A.M. and 3 P.M.
- Carpenter Avenue is a designated Collector Street south of Ventura Boulevard and a designated Local Street north of Ventura Boulevard that terminates at the southern boundary of the Project Site and continues north of Moorpark Street. It travels in the north-south direction and provides two travel lanes, one lane in each direction. Unmetered parking is generally available on both sides of the street within the Study Area.
- Berry Drive is a designated Local Street located approximately 0.35 miles east of the Project Site and travels in the north-south direction. It provides two travel lanes, one lane in each direction. Unmetered parking is generally available on both sides of the street within the Study Area.

- Maxwellton Road is a designated Local Street located approximately 0.3 miles southwest of the Project Site and travels in the east-west direction. It provides two travel lanes, one lane in each direction. Unmetered parking is generally available on both sides of the street within the Study Area.
- Laurel Terrace Drive/Sunshine Terrace Drive is a designated Collector Street located approximately 0.5 miles south of the Project Site and travels generally in the east-west direction. It provides two travel lanes, one lane in each direction. Unmetered parking is generally available on both sides of the street within the Study Area.
- Fryman Road is a designated Local Street located approximately 0.75 miles south of the Project Site and travels in the north-south direction. It provides two travel lanes, one lane in each direction. Unmetered parking with permit restrictions is generally available on both sides of the street within the Study Area.
- Valleyheart Drive (North) is a designated Local Street that terminates at Radford Avenue/the western boundary of the Project Site. Valleyheart Drive (South) is a designated Local Street that travels between Laurel Canyon Boulevard and Radford Avenue/the western boundary of the Project Site south of the Los Angeles River. Both Valleyheart Drive (North) and Valleyheart Drive (South) travel generally in the east-west direction and have two travel lanes, one lane in each direction. Valleyheart Drive (North) generally provides unmetered street parking on the north side of the street, and Valleyheart Drive (South) generally provides unmetered parking on both sides of the street.
- US-101 generally runs east-west direction in the Study Area. It is located approximately 0.35 miles north of the Project Site. In the vicinity of the Project Site, US-101 provides five travel lanes in each direction. Access to and from US-101 is available via interchanges at Laurel Canyon Boulevard.
- SR-170 generally runs in the northwest-southeast direction and is located approximately 2.2 miles northeast of the Project Site. In the vicinity of the Project Site, SR-170 provides three travel lanes and a high occupancy vehicle (HOV) lane in each direction. Access to and from SR-170 is available via interchanges at Tujunga Avenue and Riverside Drive.
- SR-134 generally runs in the east-west direction and is located approximately 0.7 miles northeast of the Project Site. Near the Project Site, SR-134 provides four travel lanes and an HOV lane in each direction. Access to and from SR-134 is available via interchanges from US-101 and at Tujunga Avenue.

Figure IV.M-1 and Figure IV.M-2 on pages IV.M-18 and IV.M-19 identify the roadway designations and modal priorities, respectively, of the streets within the Study Area based on the Mobility Plan. Additionally, as shown in Figure IV.M-3 on page IV.M-20,



LEGEND

- Project Site
- Boulevard II
- Avenue I
- Avenue II
- Collector
- Local / Other



Figure IV.M-1
Mobility Plan Street Designations



Figure IV.M-2
 Mobility Plan Roadway Modal Priorities

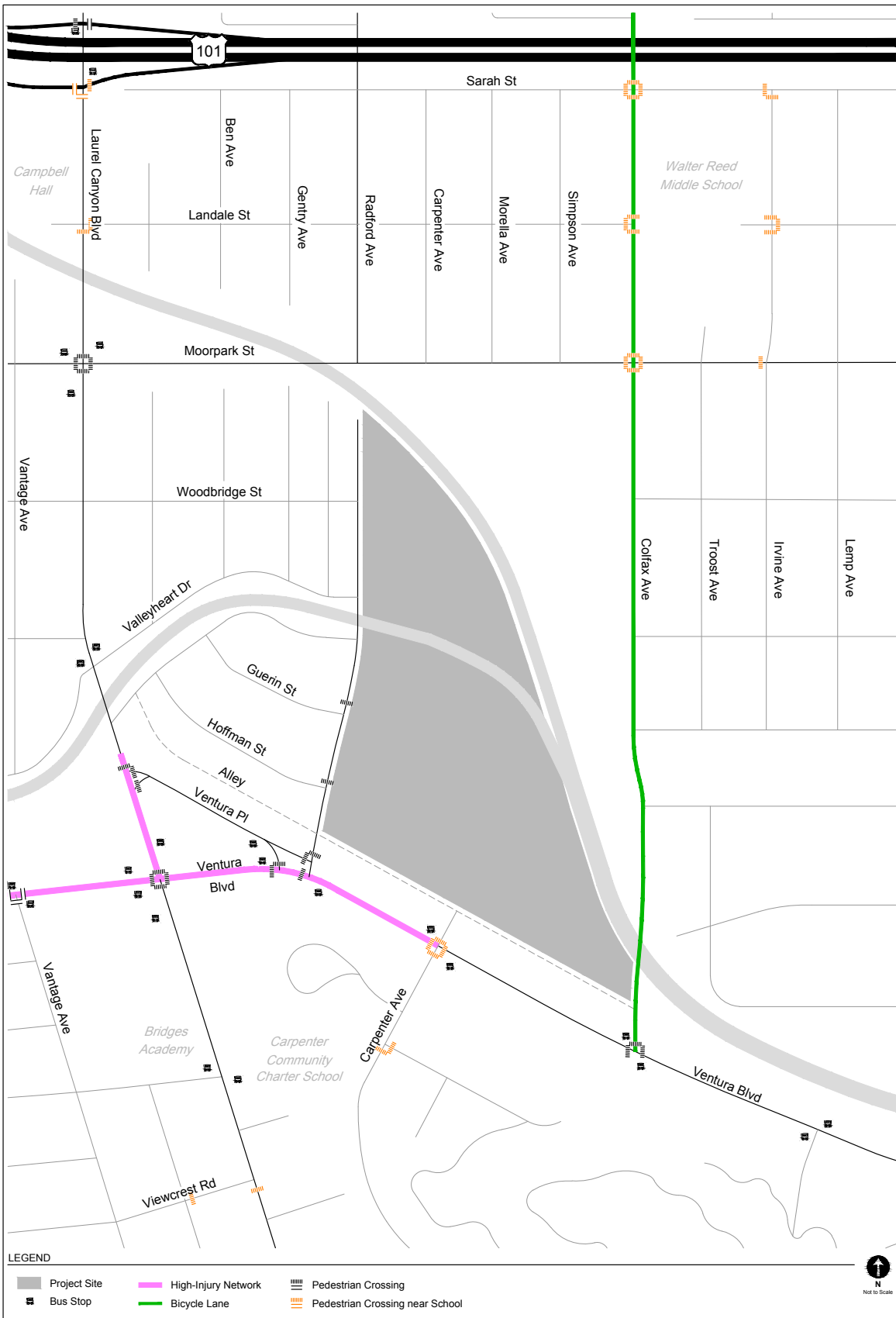


Figure IV.M-3
Existing Transportation Facilities

Laurel Canyon Boulevard between Ventura Place and Ventura Boulevard and Ventura Boulevard west of Carpenter Avenue have been identified as part of the HIN.

(b) Public Transit Service

The Study Area is served by bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT. The following provides a brief description of the bus lines providing service within the Study Area:

- Metro Local 218 is a local line that travels from Studio City to the Cedars Sinai Medical Center via Laurel Canyon Boulevard. This line operates between the hours of 5:30 A.M. and 10:00 P.M. and has an average headway of 60 minutes during the A.M. and P.M. peak periods.
- Metro Local 230 is a local line that travels from Sylmar/San Fernando Metrolink Station and Studio City via Laurel Canyon Boulevard. This line operates between the hours of 4:50 A.M. and 10:30 P.M. and has average headways of 20 to 23 minutes during the A.M. peak period and 18 to 22 minutes during the P.M. peak period.
- Metro Local 240 is a local line that travels from Northridge to the Metro B Line Universal City/Studio City Station via Reseda Boulevard and Ventura Boulevard. This line operates 24 hours a day and has average headways of 9 to 11 minutes during the A.M. and P.M. peak periods.
- LADOT DASH Van Nuys/Studio City is a local line that travels from Van Nuys to Studio City with service along Laurel Canyon Boulevard, Moorpark Street, and Ventura Boulevard within the Study Area. This line operates between the hours of 6:00 A.M. and 6:00 P.M. and has an average headway of 30 minutes during the A.M. and P.M. peak periods.

In addition, the Mobility Plan's TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. The Mobility Plan has designated Ventura Boulevard as part of the TEN.

(2) Existing Site Access and Parking

Vehicular access to the Project Site is provided at five access points along Radford Avenue, one access point along Colfax Avenue (also known as the Colfax Gate), and two

production access points along the alley just south of the Project Site.⁸ Pedestrian access to the Project Site is also available at seven access points along Radford Avenue, at the Colfax Gate, and at one access point along the alley south of the Project Site. A bridge that crosses the Los Angeles River provides internal vehicular and pedestrian access between the North Lot and South Lot of the Project Site. All vehicular and pedestrian entrances include secured, controlled access and a series of drive aisles that provide internal circulation throughout the Project Site.

As illustrated in Figure II-6 in Section II, Project Description, of this Draft EIR, existing automobile parking is located in multiple above-grade parking structures, which are accessible from both Radford Avenue and Colfax Avenue, as well as surface parking areas throughout the Project Site. A total of 3,095 vehicle spaces are currently provided within the Project Site.

(3) Existing Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

Sidewalks along both sides of Radford Avenue, Colfax Avenue, and Ventura Boulevard provide pedestrian connections to the Project Site. The Ventura Place/Radford Avenue and Ventura Boulevard intersection, the Carpenter Avenue and Ventura Boulevard intersection, and the Colfax Avenue and Ventura Boulevard intersection provide signalized pedestrian crossings near the Project Site with marked pedestrian crossings on most legs of the intersections. These intersections provide pedestrian phasing, crosswalk striping, and ADA accessible curb ramps.

The Mobility Plan aims to promote walking to reduce the reliance on automobile travel by providing more attractive and pedestrian-friendly sidewalks, as well as adding pedestrian signalizations, street trees, and pedestrian-oriented design features. The Mobility Plan has designated Laurel Canyon Boulevard south of Valley Spring Lane, Ventura Boulevard west of Carpenter Avenue, and Radford Avenue between Guerin Street and Ventura Boulevard as part of the PED, where pedestrian improvements could be prioritized to provide better connectivity to and from major destinations within communities.

(b) Bicycle Facilities

Based on the 2010 Bicycle Plan, the existing bicycle system consists of a limited network of bicycle lanes (Class II) and bicycle routes (Class III). Class II bicycle lanes are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. Class III bicycle routes and bicycle-friendly streets are those where motorists and

⁸ Access is limited for the two driveways along Radford Avenue north of the Los Angeles River.

cyclists share the roadway and there is no separated striping for bicycle travel. Bicycle routes and bicycle-friendly streets are preferably placed on Collector and lower volume Arterial Streets. Bicycle routes with shared lane markings, or “sharrows,” remind bicyclists to ride farther from parked cars to prevent collisions, increase awareness of motorists that bicycles may be in the travel lane, and show bicyclists the correct direction of travel. As detailed in the Transportation Assessment, there are currently Class II bicycle lanes along Riverside Drive, Colfax Avenue, and Tujunga Avenue within the Study Area.

The Mobility Plan’s NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. The Mobility Plan has designated Colfax Avenue north of Acama Street as part of the NEN. There are no BEN facilities near the Project Site.

c. Future Cumulative Transportation Conditions

Buildout under the Specific Plan could take place in one phase over a 39-month period or could occur in phases over multiple years. The Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Transportation Assessment analyzes Project buildout for 2028 and 2045 buildout conditions.

(1) Future Ambient Growth

As discussed in more detail in the Transportation Assessment, the analysis of future (cumulative) conditions includes both ambient growth, which reflects increases in traffic due to regional growth and development outside of the Study Area, and traffic generated by ongoing or entitled projects near or within the Study Area (i.e., related projects). As the ambient growth factor likely captures some traffic increases resulting from the related projects, the traffic analysis provides a conservative estimate of traffic volumes under Future Without Project Conditions. As specified by LADOT, a one-percent annual growth factor compounded annually was applied to the adjusted existing traffic volumes to simulate the effects of regional growth and development. A total growth of 5.10 percent was applied to account for the five-year period corresponding to buildout in Year 2028. An ambient growth factor of 0.5 percent per year compounded annually was applied to the adjusted traffic volumes between year 2028 to year 2045 to simulate regional traffic growth corresponding to the Project’s buildout under the Development Agreement. As such, a total growth of 14.95 percent was applied to account for the additional 17-year period. These growth factors account for increases in traffic due to potential projects plus projects not yet proposed and projects located outside the Study Area.

(2) Related Projects

A list of related projects was prepared based on information provided by the Department of City Planning, LADOT, and the City Bureau of Engineering (BOE), as well as recent studies of projects in the area. The related projects are listed in Table III-1 and mapped in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. The related projects are generally located within a 0.5-mile radius of the Project Site.⁹ Although the buildout years of many of the related projects are uncertain and may well extend beyond the Project's anticipated buildout year, and notwithstanding that some may not ultimately be approved or developed, all related projects were assumed to be completed by the estimated 2028 Project buildout year for purposes of the traffic analysis. Therefore, the projected traffic growth resulting from the related projects is a conservative estimate that overestimates the actual traffic volume growth that would likely occur by the 2028 Project buildout year. With the addition of the ambient growth factor previously discussed, Future Without Project Conditions are even more conservative. Refer to the Transportation Assessment for a discussion of the three-step process (trip generation, trip distribution, and trip assignment) used to estimate the related projects' traffic volume contributions to the study intersections.

(3) Future Roadway and Street Improvements

The analysis of Future Cumulative Transportation Conditions also accounts for roadway and street improvements that are funded and reasonably expected to be implemented prior to Project buildout. Any improvement that would result in changes to the physical configuration at the study intersections was incorporated into the transportation analysis. Other proposed traffic/trip reduction strategies, such as TDM programs for individual buildings and developments, were omitted from the analysis. The following plans were evaluated for their potential effects of the future transportation network.

- Los Angeles River Greenway & Bikeway Improvements: In coordination with Metro and other agencies, BOE has proposed bikeway and greenway improvements along the Los Angeles River within the San Fernando Valley that connect critical gaps in the Valley River bikeway and also include other improvements. Within the immediate vicinity of the Project Site, these anticipated improvements include bikeway improvements along Radford Avenue and the Tujunga Wash, a pedestrian/bicycle bridge over the Tujunga Wash, plantings, undergrounding of utilities, sidewalk paving and improvements to the existing Art Walk along Radford Avenue, fencing, solar lighting, signage, bio-swales and plantings along the Tujunga Wash, and a new pedestrian signal at Moorpark

⁹ While the majority of the related projects under consideration are located within 0.5 miles of the Project Site, additional development projects located beyond 0.5 miles of the Project Site (including the NBC/Universal Project located approximately 1.5 miles east of the Project Site) and 0.25 miles of the furthest outlying study intersections were also considered.

Street. BOE anticipates completion of these improvements by approximately Year 2030/2031.

- **Mobility Plan:** In the Mobility Plan, the City identifies key corridors as components of various “mobility-enhanced networks.” Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The following mobility-enhanced networks include corridors within the Project Site vicinity, which are depicted in Figure IV.M-2, above:
 - **Transit Enhanced Network (TEN):** As discussed above, the TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. The Mobility Plan has designated Ventura Boulevard as part of the TEN.
 - **Neighborhood Enhanced Network (NEN):** As discussed above, the NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. The Mobility Plan has designated Colfax Avenue north of Acama Street as part of the NEN.
 - **Bicycle Enhanced Network (BEN)/Bicycle Lane Network (BLN):** As discussed above, there are no BEN facilities proposed within the Project Site vicinity. Laurel Canyon Boulevard and Colfax Avenue are designated for Tier 2 bicycle lanes, and Ventura Boulevard is designated for Tier 3 bicycle lanes as part of the BLN.
 - **Pedestrian Enhanced District (PED):** As discussed above, the Mobility Plan has designated Laurel Canyon Boulevard south of Valley Spring Lane, Ventura Boulevard west of Carpenter Avenue, and Radford Avenue between Guerin Street and Ventura Boulevard as part of the PED, where pedestrian improvements could be prioritized to provide better connectivity to and from major destinations within communities.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access.

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the CNRA finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018, and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines Update*, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The *CEQA Transportation Analysis Guidelines Update* establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG in 2019. The analysis in this section and the Transportation Assessment, included as Appendix O.1 of this Draft EIR, uses the latest version of the TAG updated by LADOT in August 2022.

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

As described above, the CEQA Guidelines Transportation Threshold (a) has been updated to require an analysis of the proposed Project's potential to conflict with adopted plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the impact analysis below evaluates the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in Subsection 2.a, Regulatory Framework. In accordance with the TAG, a project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent.

(3) Vehicle Miles Traveled

(a) VMT Impact Thresholds

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA although CEQA allows lead agencies to set or apply their own significance thresholds. The TAG states that a residential project would result in a significant VMT impact if it would generate household VMT per capita higher than

15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee higher than 15 percent below the existing average work VMT per employee for the APC area in which it is located.

Residents contribute to household VMT while employees contribute to work VMT. The TAG identifies a daily household VMT per capita impact threshold of 9.4 and a daily work VMT per employee impact threshold of 11.6 for the South Valley APC area in which the Project Site is located. The Project does not include residential uses and, as such, a daily household VMT per capita impact threshold would not apply to the Project. The Project's analysis of VMT focuses on the work VMT. Therefore, if the Project's average work VMT per employee is equal to or lower than 11.6, the Project's overall VMT impact would be less than significant.

These thresholds—and the VMT analysis to which the thresholds apply—are based on specific types of one-way trips, including:

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

The location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of the Technical Advisory on Evaluating Transportation Impacts in CEQA.¹⁰ Therefore, as detailed in *City of Los Angeles VMT Calculator Documentation* (VMT Calculator Documentation), the City's household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, and the work VMT per employee threshold applies to Home-Based Work Attraction trips.¹¹

Other types of one-way trips considered in the VMT Calculator include Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use), Home-Based Other Attraction (trips to a non-workplace destination

¹⁰ *California Governor's Office of Planning and Research*, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

¹¹ *LADOT and Los Angeles Department of City Planning*, City of Los Angeles VMT Calculator Documentation, May 2020.

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

LADOT developed its VMT Calculator (Version 1.4; June 2023) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with the TAG.

(b) Travel Behavior Zone

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

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

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

(c) Mixed-Use Development Methodology

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

- The project location's jobs/housing balance, which factors into how many trips are local or internal to a mixed-use project

- Land use density where the project is located, which factors into the likelihood of short trips, as well as walking and bicycling
- Transportation network density, which affects the circuitry of travel (whether driving, walking, or bicycling) and, therefore, affects both trip length and the likelihood of choosing non-automobile modes of travel
- Proximity to transit, which affects the likelihood that residents or employees will travel via transit rather than automobile
- Proximity to retail and other destinations, affecting the likelihood that residents or employees will take short trips or non-automobile modes for routine commercial activities
- Vehicle ownership rates, with higher levels of vehicle ownership leading to a higher rate of automobile trips
- Household size, which affects both the number of trips made by a given residential unit (increasing or decreasing overall VMT) and the number of people when calculating the daily VMT per capita

(d) Trip Lengths

The VMT Calculator determines a project's VMT based on the trip length information from the City's Travel Demand Forecasting (TDF) Model, which considers the traffic analysis zone within 0.125 miles of a project to determine the trip length and trip type, which factor into the calculation of a project's VMT.

(e) Population and Employment Assumptions

The VMT Calculator contains population assumptions based on Census data and employment assumptions derived from multiple data sources, including the *2012 Developer Fee Justification Study* (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, *Trip Generation Manual, 9th Edition* (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling resources.¹² A summary of the population and employment assumptions for various land uses is provided in Table 1 of the VMT Calculator Documentation.

¹² *The 2024 LAUSD Developer Fee Justification Study and Trip Generation Manual, 11th Edition are now available; however, the City's VMT Calculator utilized the editions indicated herein.*

(f) *Transportation Demand Management Strategies*

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

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

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented by the California Air Pollution Control Officers Association in the report *Quantifying Greenhouse Gas Mitigation Measures*.¹³

(g) *LADOT's VMT Calculator Assumptions*

LADOT's VMT Calculator was used to evaluate Project VMT and compare it to the applicable VMT impact criteria. The VMT Calculator has built-in land use characteristics for standard land uses but does not include sound stage and production-related uses as the built-in land uses are not exhaustive and do not account for all possible uses. Where a use is not specifically identified, it is appropriate to select a representative land use type or to use empirical data. Based on a review of relevant empirical and historical data and in consultation with LADOT, it was determined that the daily trip generation characteristics and patterns of the Project's employee-based sound stage- and production-related land uses were similar in behavior to general office land use characteristics. As such, in order to evaluate the VMT generated by the Project's non-retail employees, the VMT Calculator's custom land use feature was used to represent the 2,175,000 square feet of total permitted floor area for sound stage, production support, production office, and general office uses on

¹³ *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures, August 2010.*

the Project Site. The 25,000 square feet of retail space was separately input into the VMT Calculator.¹⁴ For the purposes of providing a conservative analysis, the approximately 25,000 square feet of retail uses were input into the VMT Calculator as a high-turnover restaurant land use because it generates more trips than a standard retail land use.

The VMT Calculator's custom land use feature requires inputs for total daily trip generation, total employees, and trip production and attraction characteristics. The trip estimates exclude transit/walk-in adjustments since the VMT Calculator internally calculates those adjustments. Table IV.M-1 on page IV.M-32 shows the calculation of daily trips associated with the approximately 2,175,000 square feet of non-retail, studio-related land uses included as part of the custom land use in the VMT Calculator. Collectively, these uses are estimated to generate 16,981 trips before transit/walk-in adjustments. In addition, based on the VMT Calculator Documentation summarized in Table 10B of the Transportation Assessment, the non-retail uses would employ an estimated 8,820 employees.¹⁵ Because the non-retail employees are expected to have daily travel characteristics similar to general office employees, the trip production and attraction characteristics were matched to the general office land use as detailed in VMT Calculator Documentation. In this manner, the custom land use would generate VMT equivalent to an office development with approximately 8,820 non-retail employees generating approximately 16,981 trips before transit/walk-in adjustments.

As discussed below in Project Design Feature TR-PDF-2, though the Project includes an extensive TDM Program, the VMT analysis conservatively excludes most of the proposed measures for the purposes of determining whether the Project could have a significant impact on VMT. In accordance with guidance from the City, the VMT Calculator analysis incorporates only two TDM measures: bicycle parking per LAMC requirements and promotions and marketing of site-specific transportation options and the effects of travel choices.

(4) Hazardous Geometric Design Features

(a) Geometric Design Feature and Incompatible Uses

The TAG includes a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle, and pedestrian safety impacts, project access points, internal circulation, and parking access from an operational and safety

¹⁴ The approximately 2,200,000 square feet of floor area upon completion (2,175,000 square feet of non-retail and 25,000 square feet of retail) includes approximately 532,990 square feet of existing uses to remain and approximately 1,667,010 square feet of new construction.

¹⁵ The retail space would generate approximately 100 retail employees (as calculated internally by the VMT Calculator), for a total estimated Project employment of 8,920 people at buildout.

**Table IV.M-1
Custom Land Use Inputs for VMT Analysis—Daily Trip Estimates For Non-Retail Uses^a**

Land Use	Daily Vehicle Trip Rates ^b	Existing Uses		Proposed Uses	
		Size	Daily Vehicle Trips	Size	Daily Vehicle Trips
Sound Stage	5.91	359,730 sf	2,126	450,000 sf	2,660
Production Support	4.14	255,510 sf	1,058	300,000 sf	1,242
Production Office	9.34	450,060 sf	4,204	725,000 sf	6,772
General Office ^b	10.84	113,810 sf	1,234	700,000 sf	6,307
Total		1,179,110 sf	8,622	2,175,000 sf	16,981

sf = square feet

^a The daily trip generation characteristics and patterns of studio-related uses are similar in scope and behavior to the general office land use. Thus, the VMT Calculator's custom land use feature was used to estimate VMT per employee for the Project. The custom land use inputs include total daily trips and total employees, as well as trip purpose assumptions, which were matched to those of the VMT Calculator's general office land use.

^b Trip generation rates for sound stage, production support, and production office uses are based on empirical data from other studios in Los Angeles and have been used to estimate studio-related trips for several transportation studies, including NBCUniversal Evolution Plan Alternative 10 Transportation Analysis (Gibson Transportation Consulting, 2012) and Transportation Study for the Paramount Pictures Master Plan (Gibson Transportation Consulting, 2015).

^c Trip generation rate for the Project based on the best-fit curve formula listed in Trip Generation, 11th Edition for the General Office Building land use.

$$\text{Daily} - \ln(T) = 0.87 \ln(X) + 3.05$$

T = Average Vehicle Trips

X = Gross Floor Area (ksf)

Trip generation rate for the existing uses based on the average rate from ITE for the General Office Building land use.

Source: Gibson Transportation Consulting, Inc., 2025.

perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveways) are reviewed. Where project driveways would cross pedestrian facilities or bicycle facilities (e.g., bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of the consequences that could result are considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. Using this methodology, a project's design, including proposed infrastructure improvements, land uses, and open spaces, are reviewed to determine if the project would increase and/or create a hazardous geometric design feature(s) and/or incompatible use.

(b) Freeway Safety Analysis

Based on Section 2.4.4 of the TAG, a transportation assessment for a development project should include an analysis of nearby freeway off-ramps serving a project site where a project adds 25 or more A.M. or P.M. peak-hour trips. A project would result in a significant impact at such a ramp if each of the following three criteria is 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).

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

(5) Emergency Access

In consultation with the Los Angeles Fire Department (LAFD), analysis of a project's potential access impacts must include a review of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination is then made pursuant to the thresholds of significance identified above regarding the potential for these types of project features to impede emergency access on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would include the Project Design Features set forth below.

Project Design Feature TR-PDF-1: A detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval prior to commencing construction. The Construction Traffic Management Plan will formalize how Project construction will be carried out and identify specific actions that will reduce effects on the surrounding community. The Construction Traffic Management Plan will

be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following elements, as appropriate:

- The Applicant will designate a construction manager to serve as a liaison with the surrounding community and respond to any construction-related inquiries. Publicly-visible signs will be posted at various locations with the liaison's information and phone number to contact regarding inquiries and/or complaints, including dust complaints. The South Coast Air Quality Management District's phone number will also be included to ensure compliance with applicable regulations.
- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets or in predominantly residentially zoned areas.
- Temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people trained in pedestrian and bicycle safety at the Project Site's driveways) during all construction activities adjacent to Radford Avenue, Ventura Boulevard, and Colfax Avenue, to ensure traffic safety on the public right-of-way.
- Scheduling of construction-related activities to reduce the effect on traffic flow on surrounding major roadways.
- Containment of construction activity within the Project Site boundaries.
- Coordination with the Los Angeles Department of Transportation (LADOT) Parking Meter Division to address any potential loss of metered parking spaces.
- Implementing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.
- Rerouting construction trucks to reduce travel on congested streets.
- Provision of dedicated turn lanes for the movement of construction trucks and equipment on- and off-site, subject to LADOT review and approval.
- Prohibition of haul truck staging on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.

- Sufficient dampening 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 Project Site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day.

Project Design Feature TR-PDF-2: The Project will implement a series of transportation demand management (TDM) measures that exceed the requirements established in the existing TDM Ordinance. The TDM strategies will be implemented for the Project Site as a whole and will be available to both the existing and new employees on-site. The TDM Program will be subject to review and approval by the City, and the Applicant will record a Covenant and Agreement to ensure that the TDM Program will be maintained. The following TDM strategies will be implemented as proposed under the TDM Program:

- Education Programs/On-Site Coordinator: A coordinator will reach out to employees directly to promote the benefits of TDM. The coordinator would provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, ride-share/carpool/vanpool programs, and parking incentives.
- Transportation Information Center/Kiosks via Mobility Hubs: The Project will install a transportation information center at the Mobility Hubs.¹⁶ The transportation information center will provide employees and visitors with information regarding transit, commute programs, and non-vehicular travel planning. Informational digital bulletin boards and wayfinding information will be displayed along pedestrian paths to direct pedestrians to the Mobility Hubs, nearby transit stops, bicycle parking, and bikeshare facilities.
- Bicycle Amenities: In addition to the short-term and long-term bicycle parking spaces provided in accordance with the LAMC, the Project would also provide showers, lockers, and bicycle service areas and repair stands within the Project Site to facilitate bicycle use. The Project would incorporate features for bicyclists, such as exclusive access points and secured bicycle parking facilities. The Project Applicant would also contribute toward the implementation of bicycle improvements within the Study Area under the Mobility Plan.
- Pedestrian Amenities: The Project will incorporate features for pedestrians, such as landscape improvements, exclusive access points, and upgraded pedestrian facilities and bus stops.

¹⁶ The initial mobility hub would be located in the South Lot. Upon completion of the Radford Bridge, a second mobility hub would be located in the North Lot.

Additionally, the Project Site will be designed to be a safe, friendly, and convenient environment for pedestrians. The Project will provide more pedestrian-friendly sidewalks and areas along Radford Avenue, Colfax Avenue, and Moorpark Street, and maintain internal walkways throughout the Project Site. The Applicant will also contribute toward pedestrian facilities improvements as part of Vision Zero.

- Ride-Share Matching and Carpool/Vanpool Program: The on-site TDM coordinator will provide ride-share matching services to match interested employees with similar commuters into carpools and vanpools.
- Neighborhood Enhancements: The Project will enhance the transportation mobility around the immediate Project Site area to encourage alternative transportation modes and connections to the Project Site from off-site locations. The Project will also enhance existing crosswalks at the signalized intersections in the Project area to current LADOT standards. As part of the Radford Bridge, the Project will provide public pedestrian and bicycle access from Moorpark Street to Ventura Boulevard via Radford Avenue, while prohibiting through access north and south along Radford Avenue for vehicles. Access to the Los Angeles River and Tujunga Wash will also be enhanced.
- First-Mile/Last-Mile Options: In recent years, there has been a proliferation of new options for personal transportation that help to address first-mile/last-mile connectivity issues with public transit. These options include motorized scooters, skateboards, and bicycles, as well as human-powered bicycles. Some of these options involve personal ownership (various types of electric skateboards, bicycles, and scooters) and some are publicly available for short-term rentals (electric scooters, Metro Bike Share pedal-powered bicycles). These services are rapidly evolving and gaining widespread acceptance, and it is anticipated that by the time the Project is completed, the landscape for these services, as well as the regulatory issues surrounding some of them, may look substantially different. The Applicant is committed to forward-thinking mobility solutions in the design and implementation of the Project and intends to provide support for such services at the Mobility Hubs. These services give employees a variety of travel mode choices and, therefore, encourage the use of non-automobile modes of transportation to and from the Project Site and reduce VMT.
- Carpool/Vanpool Parking and Loading via Mobility Hubs: The Mobility Hubs will provide safe and convenient passenger loading areas for employee carpools/vanpools along with access to the Project Site's internal roadway network to get to the parking

structures. Additional passenger loading areas are also proposed within the Project Site at the Mobility Hubs.

- **Guaranteed Ride Home Program:** A Guaranteed Ride Home program assures that transportation service will be provided to individuals who commute without their personal automobiles. This program overcomes one of the primary concerns of those who may choose alternative modes of transportation, which is how to get home or to a child’s school in case of an emergency. In the event of personal or family emergencies, the individual will be reimbursed for a taxi ride, ride-share ride, or short-term car rental. This program will cover all employees participating in the carpool/vanpool program or using transit to and from the Project Site. A support service, such as Guaranteed Ride Home, is an important part of TDM implementation that assures an individual will not be dependent on a carpool or transit schedule in the event of an emergency.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Table 2.1-1 in the TAG identifies the City plans, policies, programs, ordinances, and standards relevant in determining project consistency. Attachment D of the TAG, Plans, Policies, and Programs Consistency Worksheet, provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: Mobility Plan; Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan; Plan for a Healthy Los Angeles; the LAMC; Vision Zero; and Citywide Design Guidelines. The Project’s potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

(a) Mobility Plan

As discussed above, the Mobility Plan combines “complete street” principles with five goals that define the City’s mobility priorities: Safety First; World Class Infrastructure; Access for all Angelenos; Collaboration, Communication, and Informed Choices; and Clean Environments and Healthy Communities. A detailed analysis of the Project’s potential to conflict with the policies in the Mobility Plan is provided in Table IV.M-2 beginning on page IV.M-38. As previously described, the Mobility Plan identifies key corridors within the Study Area as components of various “mobility-enhanced” networks, including the TEN, NEN, PED, and BEN/BLN. As discussed above, in the vicinity of the Project Site, Ventura Boulevard is part of the TEN; Colfax Avenue north of Acama Street is part of the NEN;

**Table IV.M-2
Potential for Project to Conflict with the Mobility Plan**

Objective, Policy, Program, or Plan	Would the Project conflict?
Chapter 1: Safety First	
<p><u>Policy 1.1 Roadway User Vulnerability</u> Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.</p>	<p>No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing the policy. The Project would contribute toward pedestrian and bicycle facility improvements, including ADA ramps. The Project would also improve the continental crosswalk striping at the intersection of Carpenter Avenue and Ventura Boulevard to increase pedestrian and motorists visibility. All improvements within the public right-of-way would be designed and completed in consultation with LADOT, or other agencies, and in compliance with applicable regulatory standards. The Project also proposes to enhance public access to the Los Angeles River and Tujunga Wash and construct the Radford Bridge, a bridge connection from the existing northern terminus of Radford Avenue to Moorpark Street. The Project would also implement a protected Class IV bikeway along Radford Avenue adjacent to the Project Site consistent with the City's 2010 Bicycle Plan to provide a safer bike connection to the Los Angeles River and Tujunga Wash. Pedestrian access to the Project Site would be provided separate from the vehicle access points to reduce potential vehicle-pedestrian conflicts.</p>
<p><u>Policy 1.2 Complete Streets</u> Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.</p>	<p>No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing the policy. The Project would comply with all design element requirements, which may affect public rights-of-way, including proper driveway alignment, sidewalk widths, improved lighting elements, and landscaping design, which would not hinder sight distance, mobility, or accessibility. Furthermore, the Project's streetscape improvements and bicycle facilities would facilitate pedestrian and bicycle accessibility to improve the safety and mobility of all users.</p>
<p><u>Policy 1.3 Safe Routes to Schools</u> Prioritize the safety of school children on all streets regardless of highway classifications.</p>	<p>No Conflict. Carpenter Community Charter School is located approximately 800 feet south of the Project Site along Carpenter Avenue. The City's Safe Routes to School program currently does not include plans for Carpenter Community Charter School. Nonetheless, it is anticipated that striped crosswalks near the Project Site vicinity would continue to be used as crossing locations, including across Carpenter Avenue at Ventura Boulevard and Laurelwood Drive and across Laurel Canyon Boulevard at Maxwellton Road. The Project would provide intersection upgrades at the intersection of Carpenter Avenue and Ventura Boulevard, which would include the improvement of existing continental crosswalk striping to provide safer pedestrian crossings by increasing visibility and the</p>

Table IV.M-2 (Continued)
Potential for Project to Conflict with the Mobility Plan

Objective, Policy, Program, or Plan	Would the Project conflict?
	creation of exclusive eastbound and westbound left-turn phasing to reduce potential pedestrian-vehicle conflicts.
<p><u>Policy 1.6 Multi-Modal Detour Facilities</u> Design detour facilities to provide safe passage for all modes of travel.</p>	<p>No Conflict. The Project would prepare a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1 that would include detour routes for any potential impediments to the public right-of-way that may affect pedestrian, bicyclists, motorists, and transit users.</p>
Chapter 2: World Class Infrastructure	
<p><u>Policy 2.2 Complete Streets Design Guide</u> Establish the Complete Streets Design Guide as the City's document to guide the operations and design of streets and other public rights-of-way.</p>	<p>No Conflict. As part of the Project's Radford Bridge and any off-site physical improvements, the Project would conform to all design element requirements that may affect the public rights-of way, including proper driveway alignment, sidewalk widths, improved lighting elements, and landscaping design, to improve safety, visibility, mobility, and accessibility at Project access points and along the Project frontages.</p>
<p><u>Policy 2.3 Pedestrian Infrastructure</u> 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.</p>	<p>No Conflict. Radford Avenue along the Project Site is part of a designated PED. The Project would enhance pedestrian facilities along all Project Site frontages through sidewalk improvements, including the widening of sidewalks in some areas consistent with Mobility Plan standards, installation of new street trees and landscaping, lighting, wayfinding signage, and pedestrian amenities, such as benches. The Project would provide a 17-foot-wide setback area along the western edge of the North Lot and a 10-foot-wide setback area along the western edge of the South Lot along Radford Avenue, as well as a 15-foot-wide setback area along the southeastern edge of the South Lot along Colfax Avenue, a portion of which would be comprised of landscaping. As part of the Project, public access to the Los Angeles River and Tujunga Wash would be enhanced through the provision of a new paved pedestrian/bicycle path. The Project would also upgrade the crosswalks and bus stops along the Project Site perimeter and provide designated pedestrian entrances to the Project Site. Moreover, the Project would include safe, delineated pathways for pedestrians throughout the Project Site.</p>
<p><u>Policy 2.4 Neighborhood Enhanced Network</u> Provide a slow speed network of locally serving streets.</p>	<p>No Conflict. No roadways along the Project Site are part of the NEN. Colfax Avenue, north of Acama Street and across the Los Angeles River and Tujunga Wash from the Project Site, is designated as part of the NEN; however, the Project does not propose any vehicular access along this segment. Nevertheless, the Project would provide improvements, such as a Class IV bikeway on Radford Avenue, that would provide comfortable and safe routes for localized travel of slower-moving modes, such as bicycling, or other slow speed motorized means of travel. The</p>

Table IV.M-2 (Continued)
Potential for Project to Conflict with the Mobility Plan

Objective, Policy, Program, or Plan	Would the Project conflict?
	<p>Project's Radford Bridge would facilitate vehicular access to and from the Project Site at the northern terminus of Radford Avenue. With the exception of emergency vehicles, no through access for vehicles north or south along Radford Avenue would be permitted to use the Radford Bridge ensure there would be no vehicular conflicts with other vehicles, pedestrians, and bicyclists. As such, Project vehicles would not interfere with the neighborhood character of the surrounding area.</p> <p>Additionally, a full analysis of the Project's potential effects on neighborhood streets, along with the Project's Neighborhood Traffic Management Plan, is provided in Section 5C of the Transportation Assessment. As discussed therein, the Project would contribute to and implement a Neighborhood Traffic Management Plan for the residential neighborhoods north, west, south, and east of the Project Site to minimize potential cut-through trips on residential streets.</p>
<p><u>Policy 2.5 Transit Network</u> Improve the performance and reliability of existing and future bus service.</p>	<p>No Conflict. No roadways along the Project Site are part of the TEN. In the vicinity of the Project Site, Ventura Boulevard south of the Project Site is part of the TEN. While this policy applies to the City and not development projects, the Project would not preclude future improvements to existing and future transit services or operations that would conflict with plans under development by Metro and/or LADOT. Additionally, the Project proposes on-site Mobility Hubs that would support alternative transportation modes.</p>
<p><u>Policy 2.6 Bicycle Networks</u> Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.</p>	<p>No Conflict. Adjacent to the Project Site, Colfax Avenue is part of the BLN. Bicycle lanes are provided along both sides of the street immediately north of the Project Site's existing vehicular access point on Colfax Avenue. The Project also proposes to modify the street designation of Radford Avenue from Avenue II to Modified Avenue II to facilitate a protected Class IV bikeway adjacent to the Project Site. The Project's open space plan to provide access to and connect pedestrians and bicyclists with the Los Angeles River would be consistent with the improvements already envisioned by the City. The Project would also provide on-site bicycle parking and services, such as repair stands, showers, and lockers, to encourage bicycling for employees and visitors to the Project Site. The proposed Mobility Hubs would also provide space for bike-share facilities, bicycle rentals, and other similar services that may be available in the future.</p>
<p><u>Policy 2.9 Multiple Networks</u></p>	<p>No Conflict. As discussed above in Policies 2.3 to 2.6, the Project vicinity includes a mix of enhanced networks identified as part of the Mobility Plan. While this policy applies to the City and not development projects, the</p>

Table IV.M-2 (Continued)
Potential for Project to Conflict with the Mobility Plan

Objective, Policy, Program, or Plan	Would the Project conflict?
Consider the role of each enhanced network when designing a street that includes multiple modes.	Project would not preclude the City from implementing this policy. The Project would improve the overall pedestrian experience surrounding the Project Site and would not conflict with the City's bicycle plans as identified in the Mobility Plan. The Project's Radford Bridge would facilitate pedestrian and bicycle access to and from the Project Site at the northern terminus of Radford Avenue. With the exception of emergency vehicles, no through access for vehicles north or south along Radford Avenue would be permitted to use the Radford Bridge to ensure there would be no vehicular conflicts with other vehicles, pedestrians, and bicyclists.
<p><u>Policy 2.10 Loading Areas</u></p> <p>Facilitate the provision of adequate on and off-street loading areas.</p>	<p>No Conflict. In addition to providing on-site parking in subterranean structures, above-grade parking structures, and surface parking lots, the Project would provide on-site loading facilities for passengers, commercial vehicles, and studio production-related trucks. The Mobility Hubs would be the primary locations for passenger loading. The Project would provide private service areas and roadways for all other loading services within the Project Site. Thus, no commercial loading operations would occur within the public right-of-way.</p>
<p><u>Policy 2.17 Street Widening</u></p> <p>Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.</p>	<p>No Conflict. The Project does not propose the widening of any roadways adjacent to the Project Site. As such, the Project would not conflict with the intent of the Mobility Plan.</p>
<p>Chapter 3: Access for All Angelenos</p>	
<p><u>Policy 3.1 Access for All</u></p> <p>Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.</p>	<p>No Conflict. The Project supports initiatives to create transit-oriented developments by expanding employment opportunities in a TPA well-served by public transit. The Project would provide facilities for all travel modes through on-site bicycle parking areas and amenities, a new paved pedestrian/bicycle path via the Project's Radford Bridge located at the northern terminus of Radford Avenue, and development of the Mobility Hubs. The Mobility Hubs would provide opportunities for first-mile/last-mile connections to encourage Project employees and visitors to use public transit, carpools, vanpools, and bikes/scooters to get to and from the Project Site and support TDM strategies to further promote alternative transportation modes. The Project's TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service, a ride-share matching and</p>

Table IV.M-2 (Continued)
Potential for Project to Conflict with the Mobility Plan

Objective, Policy, Program, or Plan	Would the Project conflict?
	carpool/vanpool program, first-mile/last-mile options, and a Guaranteed Ride Home program.
<p><u>Policy 3.2 People with Disabilities</u> Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>	<p>No Conflict. The Project would be designed to meet all ADA requirements, including providing adequate access to pedestrian amenities at nearby intersections by meeting specific ADA curb ramp standards and providing the minimum sidewalk width along the Project Site's street frontages.</p>
<p><u>Policy 3.3 Land Use Access and Mix</u> Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p>No Conflict. The Project would focus growth in a high-density, jobs-rich area in close proximity to transit. The Project would support initiatives to reduce vehicle trips by expanding employment opportunities in proximity to residential areas, neighborhood services, and local-serving retail and restaurants in an urban area. The Project would also encourage ride-sharing and the use of alternative mobility modes via the Mobility Hubs. Additionally, the Project would implement a TDM Program to further reduce the number of single occupancy vehicle trips to the Project Site.</p>
<p><u>Policy 3.4 Transit Services</u> Provide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services.</p>	<p>No Conflict. The Project Site is located near bus stops serviced by local bus lines. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing this policy. The Project would include development of the Mobility Hubs that would act as central locations for Project employees and visitors to access convenient and multi-modal transportation services. Pedestrian and bicycle access to existing and future transit services would be enhanced with the creation of the new Radford Bridge, Class IV bikeways, and additional landscaping, sidewalk, and crosswalk improvements adjacent to the Project Site.</p>
<p><u>Policy 3.5 Multi-Modal Features</u> Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.</p>	<p>No Conflict. The Project's Mobility Hubs would support multi-modal mobility options through a transportation information center and first-mile/last-mile connections for transit, passenger loading spaces for carpools and vanpools, bicycle parking, and related bicycle services, such as valet service, repair stands, showers, and lockers, to maximize multi-modal connectivity and access for transit riders. In combination with the numerous transportation services to be provided at the proposed Mobility Hubs, the Project's location within a TPA near several public transit services would encourage the use of alternative mobility modes. The TDM Program includes strategies that would further encourage the use of transit and other alternative modes of transportation and would include features, such as bicycle and scooter rentals. The TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle</p>

Table IV.M-2 (Continued)
Potential for Project to Conflict with the Mobility Plan

Objective, Policy, Program, or Plan	Would the Project conflict?
	service, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, and a Guaranteed Ride Home program.
<p><u>Policy 3.7 Regional Transit Connections</u></p> <p>Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.</p>	<p>No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing this policy. The Project would improve access between transit and major regional destinations by creating Mobility Hubs that would provide space for first-mile/last-mile solutions, such as bike-share, bicycle rentals, and other similar services, and improve the efficiency and convenience to existing and future transit access and services.</p>
<p><u>Policy 3.8 Bicycle Parking</u></p> <p>Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.</p>	<p>No Conflict. The Project would provide convenient, well-maintained, and secured long-term and short-term bicycle parking to encourage bicycling for employees and visitors to the Project Site. The Mobility Hubs would also provide bike share facilities or similar first-mile/last-mile transportation alternatives and bicycle amenities, such as repair stands, showers, and lockers.</p>
<p>Chapter 4: Collaboration, Communication, & Informed Choices</p>	
<p><u>Policy 4.1 New Technologies</u></p> <p>Support new technology systems and infrastructure to expand access to transportation choices.</p>	<p>No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing this policy. The Project's TDM Program described in Project Design Feature TR-PDF-2 would support the latest improvements in first-mile/last-mile transportation solutions within the Mobility Hubs, such as bike-share, bicycle rentals, or similar programs. The Project would support new technology systems and infrastructure by incorporating pedestrian wayfinding signage and real-time transit information via digital bulletin boards so that employees and visitors can be informed of the available transportation services.</p>
<p><u>Policy 4.2 Dynamic Transportation Information</u></p> <p>Support a comprehensive, integrated transportation database and digital platform that manages existing assets and dynamically updates users with new information.</p>	<p>No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing this policy. The Mobility Hubs would be equipped with digital bulletin boards that display real-time information about public transit schedules and shuttle services.</p>
<p><u>Policy 4.8 Transportation Demand Management Strategies</u></p> <p>Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.</p>	<p>No Conflict. The Project's TDM Program, as presented in detail in Project Design Feature TR-PDF-2, includes the following measures to reduce dependence on single-occupancy vehicles:</p> <ul style="list-style-type: none"> • Educational Programs/On-Site Coordinator • Transportation Information Center/Kiosks • Carpool/Vanpool Parking and Loading

Table IV.M-2 (Continued)
Potential for Project to Conflict with the Mobility Plan

Objective, Policy, Program, or Plan	Would the Project conflict?
	<ul style="list-style-type: none"> • Bicycle and Pedestrian Amenities • First-Mile/Last-Mile Options • Ride-Share Matching, Carpool/Vanpool, Guaranteed Ride Home Programs • Local Transit Infrastructure Improvements • Shuttle Service • Transportation Mobility Enhancements
<p><u>Policy 4.13 Parking and Land Use Management</u></p> <p>Balance on-street and off-street parking supply with other transportation and land use objectives.</p>	<p>No Conflict. The Project includes subterranean structures, above-grade parking structures, and surface parking lots to meet the needs of employees and visitors at the Project Site. The Project would not rely on any on-street parking. The Specific Plan would establish vehicular parking requirements for each of the land use categories.</p>
<p><u>Policy 4.14 Wayfinding</u></p> <p>Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms.</p>	<p>No Conflict. The Project, through the TDM Program described in Project Design Feature TR-PDF-2, would include marketing activities, including printed/posted materials and digitally distributed information, to ensure that employees and visitors at the Project Site are aware of all mobility options available on-site and in the surrounding area. The Project would provide pedestrian wayfinding information displayed along the pedestrian paths to direct pedestrians to the Mobility Hubs, nearby transit stops, bicycle parking, and bike-share facilities.</p>
<p>Chapter 5: Clean Environments & Healthy Communities</p>	
<p><u>Policy 5.1 Sustainable Transportation</u></p> <p>Encourage the development of a sustainable transportation system that promotes environmental and public health.</p>	<p>No Conflict. The Project would encourage a sustainable transportation system that promotes environmental and public health by supporting alternative modes of transportation through the services available at the Mobility Hubs, such as displaying and distributing transit information, providing bike-share rentals, and implementing first-mile/last-mile solutions. The Project would enhance pedestrian facilities along all Project Site frontages, enhance public access to the Los Angeles River and Tujunga Wash, and provide new landscaping elements and a protected bikeway along Radford Avenue consistent with the 2010 Bicycle Plan. The Project would also provide secured on-site bicycle parking facilities and amenities and dedicated pedestrian entries, all of which would promote active transportation modes, such as biking and walking. Additionally, the Project is located in a TPA within a 0.25-mile walking distance to bus stops served by local transit lines, thereby providing Project employees and visitors with public transportation alternatives. Together, these Project elements would encourage walking, biking, and other forms of exercise which would promote public health.</p>

Table IV.M-2 (Continued)
Potential for Project to Conflict with the Mobility Plan

Objective, Policy, Program, or Plan	Would the Project conflict?
<p><u>Policy 5.2 Vehicle Miles Traveled (VMT)</u> Support ways to reduce vehicle miles traveled (VMT) per capita.</p>	<p>No Conflict. As discussed below under Threshold (b), the Project is estimated to generate lower work VMT per employee than the average for the area. Furthermore, the Project would implement a TDM Program described in Project Design Feature TR-PDF-2 to reduce single occupancy vehicle trips and promote alternative transportation modes.</p>
<p><u>Policy 5.4 Clean Fuels and Vehicles</u> Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.</p>	<p>No Conflict. The Project would provide electric vehicle (EV)-ready charging stations and have additional parking spaces capable of supporting future EV supply equipment to accommodate those who arrive in EVs. By providing this type of service, the Project promotes usage of clean fuels and EVs.</p>
<p>^a Objectives, Policies, Programs, or Plans based on information provided in <i>Mobility Plan 2035: An Element of the General Plan</i> (Los Angeles Department of City Planning, January 2016). Source: Gibson Transportation, 2025.</p>	

Laurel Canyon Boulevard, Colfax Avenue, and Ventura Boulevard have been designated as part of the BLN; and Laurel Canyon Boulevard south of Valley Spring Lane, Ventura Boulevard west of Carpenter Avenue, and Radford Avenue between Guerin Street and Ventura Boulevard are identified as part of the PED. As provided in the Transportation Assessment, though no specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. As discussed further below, the Project would support the City's overarching objective of the mobility-enhanced networks to improve urban mobility.

The Mobility Plan also designates street and sidewalk width standards based on a street's functional classification. The Project would maintain the existing roadway widths on Radford Avenue and Colfax Avenue. In addition, the Project would provide a 17-foot-wide setback area along the western edge of the North Lot, a 10-foot-wide setback area along the western edge of the South Lot along Radford Avenue, and a 15-foot-wide setback area along the southeastern edge of the South Lot along Colfax Avenue, a portion of which would include landscaping.

The Project would enhance public pedestrian and bicycle access to the Los Angeles River and Tujunga Wash through the construction of the Radford Bridge. The Project is also requesting to modify Radford Avenue from Avenue II to Modified Avenue II to provide a protected Class IV bikeway adjacent the Project Site. Additionally, as a result of the Project's

proposed Radford Bridge, vehicular circulation at the Project Site would be improved with the introduction of the new gate to the North Lot, which would alleviate Project-related vehicle traffic at the other driveways and redistribute trips generated by the existing studio-related uses at the Project Site. Further, due to the well-connected network of vehicular, pedestrian, and bicycle facilities provided on-site connecting the North and South Lots, the Project would not conflict with the Mobility Plan's infrastructure goals.

The Project would support initiatives to create transit-oriented developments by expanding employment opportunities in a location served by transit, supporting Metro ridership goals, and enhancing transportation mobility. The Project is located in a dense, urbanized area near existing and future transit stops that would encourage the use of alternative modes of transportation through the pedestrian/bicycle amenities discussed previously and the services that would be made available at the Mobility Hubs discussed further below. The Project would also provide employment and commercial opportunities in proximity to alternative transportation options, such as local bus stops and bicycle amenities, to reduce reliance on vehicle travel.

The Project's Mobility Hubs would support multi-modal mobility options, first-mile/last-mile connections, and other TDM strategies, including, but not limited to, bike-share services, carpool/vanpool loading areas, and informational digital bulletin boards. The Project would also provide secured bicycle parking facilities and amenities, such as repair stands, showers, and lockers within the Project Site. These measures would promote active transportation modes, such as biking and walking. Furthermore, the Project's TDM Program would further reduce vehicle trips and would result in lower work VMT per employee compared to the average for the area as demonstrated in the analysis further below.

Based on the above, the Project would not conflict with the Mobility Plan.

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

A detailed analysis of the Project's potential to conflict with the transportation-related policies set forth in the Community Plan is provided in Table IV.M-3 beginning on page IV.M-47. As detailed therein, the Project includes open space and landscaping improvements to enhance the public areas along the Project Site frontages. The Project would also improve mobility for pedestrians and encourage the use of alternative transportation modes through landscaping elements along the Project frontages, on-site bicycle amenities, and on-site Mobility Hubs. The proposed Mobility Hubs would provide opportunities for first-mile/last-mile solutions to encourage Project employees and visitors to use public transit, carpools, vanpools, and bikes/scooters to get to and from the Project Site and support other TDM strategies to further reduce the number of single-occupancy trips generated by the Project, as discussed in further detail below. Therefore, the Project would not conflict with the transportation-related goals and objectives of the Community Plan.

**Table IV.M-3
Potential for Project to Conflict with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass
Community Plan^a**

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
Policy 2-3.1: Existing pedestrian-oriented areas are to be preserved.	No Conflict. The Project would improve pedestrian oriented areas by enhancing the public areas along the Project frontages through the provision of new landscaping and street trees, lighting, wayfinding signage, and pedestrian/transit amenities, such as benches. The Project would also improve the surrounding pedestrian environment by widening certain sidewalks and upgrading crosswalks to continental crosswalks and traffic signals with exclusive left-turn phasing to improve visibility and safety and reduce potential pedestrian-vehicle conflicts. The Project would also contribute toward pedestrian facility improvements within the Study Area.
Policy 2-3.2: New development needs to add to and enhance the existing pedestrian street activity.	No Conflict. The Project would enhance the public areas along all Project Site frontages by providing new landscaping and street trees, lighting, wayfinding signage, and pedestrian/transit amenities, such as benches. The Project would improve the surrounding pedestrian street activity and environment by widening certain sidewalks and upgrading crosswalks to continental crosswalks and traffic signals with exclusive left-turn phasing to improve visibility and safety and reduce potential pedestrian-vehicle conflicts. The Project would also contribute toward pedestrian facility improvements within the Study Area. The Project would enhance the existing pedestrian street activity by enhancing public access to the Los Angeles River and Tujunga Wash in coordination with the Project's proposed Radford Bridge. A new paved pedestrian/bicycle path and landscaping improvements along Radford Avenue would also be provided as part of the Project. The improved pedestrian network would be further supported by the multi-modal mobility options to be provided at the proposed Mobility Hubs.
Policy 2-4.4: Landscaped corridors should be created and enhanced [sic] through the planting of street trees along segments with no building setbacks and through median plantings.	No Conflict. The Project would provide approximately 109,569 square feet of open space along the Project Site boundaries. As part of the Project, the adjacent sidewalks would be lined with regularly spaced street trees and landscaping elements to provide adequate shade, create a more comfortable environment for pedestrians, and improve the overall existing streetscape. In addition, a 17- to 10-foot-wide setback area would be provided along Radford Avenue, and a 15-foot-wide setback area would be provided along Colfax Avenue. These areas would function as buffers and transitional space around the Project Site perimeter and would incorporate landscaping.
Policy 2-5.1: Require that future development of properties located along the Los Angeles River be designed with river access features.	No Conflict. The Project proposes to enhance public access to the Los Angeles River and Tujunga Wash for pedestrians and bicyclists through the proposed Radford Bridge, a bridge connection extending from the northern

Table IV.M-3 (Continued)
Potential for Project to Conflict with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
	terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street, which would provide pedestrian and bicycle routes across the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the Los Angeles River trail system.
Policy 10-1.1: Continue to coordinate with the Metropolitan Transportation Authority (MTA) to improve local bus service to and within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass plan area.	No Conflict. The Project would coordinate with the appropriate agencies, including Metro, regarding any improvements to local transit services in the area, such as improvements to benches, shelters, lighting, and signage at bus stops in the Project Site vicinity.
Policy 10-1.2: Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled people, students, and low-income, transit-dependent populations.	No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing this policy. The Project would enhance the public areas along all Project Site frontages and access to the Los Angeles River and Tujunga Wash. A protected bikeway would also be provided along Radford Avenue adjacent to the Project Site. The Project would also contribute toward pedestrian facility improvements within the Study Area. The Project design would comply with all ADA requirements.
Policy 10-1.3: Encourage the provision of safe, attractive and clearly identifiable transit stops with user friendly design amenities.	No Conflict. While this policy applies to LADOT and Metro (i.e., transit service providers in the Project area) and not development projects, the Project would incorporate landscaping improvements, lighting, and wayfinding signage. As discussed in Policy 10-1.1 above, the Project would coordinate with the appropriate agencies, including Metro, regarding any improvements to local transit services in the area, such as improvements to benches, shelters, lighting, and signage at bus stops in the Project Site vicinity. The Project would also include Mobility Hubs, which would serve to connect the Project Site with surrounding public transit lines and encourage alternative means of transportation and mobility.
Policy 10-2.1: Develop an intermodal mass transportation plan to implement linkages to future mass transit service.	No Conflict. The Project would support the initiatives for an intermodal mass transportation plan by providing improvements to connections to existing and future transit stops and installing on-site Mobility Hubs to support existing and future multi-modal mobility options. The Project's Mobility Hubs would support first-mile/last-mile solutions to encourage Project employees and visitors to use public transit, carpools, vanpools, and bikes/scooters to get to and from the Project Site and support other TDM strategies. The Mobility Hubs would also support future shuttle services to provide a connection to existing and/or future transit stations (e.g., Metro B and G Lines).

Table IV.M-3 (Continued)
Potential for Project to Conflict with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
<p>Policy 11-1.1: Encourage non-residential developments to provide employee incentives for using alternatives to the automobile (i.e., car pools, vanpools, buses, flex time, bicycles, and walking, etc.).</p>	<p>No Conflict. The Project would implement a TDM Program described in Project Design Feature TR-PDF-2 to promote and provide employees and visitors with opportunities to utilize alternative transportation modes and reduce the number of single occupancy vehicle trips to the Project Site. The Project Mobility Hubs would provide opportunities for first-mile/last-mile solutions to encourage Project employees and visitors to use public transit, carpools, vanpools, and bikes/scooters to get to and from the Project Site and support TDM strategies to further promote alternative transportation modes. The Project's TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service, a rideshare matching and carpool/vanpool program, first-mile/last-mile options, and a Guaranteed Ride Home program. In addition, the Project's TDM Program would encourage travel via alternative transportation modes and reduce single-occupancy vehicle trips. The Project would contribute toward signal improvements at nearby intersections and the implementation of bicycle facilities within the Study Area. The on-site coordinator would reach out to employees directly to promote the benefits of the TDM Program and would provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/vanpool programs, and parking incentives.</p>
<p>Policy 11-1.2: Encourage the use of Multiple-Occupancy Vehicle programs for shopping and other activities to reduce midday traffic.</p>	<p>No Conflict. The Project would implement a TDM Program described in Project Design Feature TR-PDF-2 to promote and provide employees and visitors with opportunities to utilize alternative transportation modes and reduce the number of single occupancy vehicle trips to the Project Site. The TDM Program would include, among other things, a rideshare matching and for carpool/vanpool programs. Additionally, the Project would include various on-site amenities and support facilities through the implementation of the Mobility Hubs and improved off-site pedestrian and bicycle facilities that would promote midday off-site trips made via alternative transportation modes. Furthermore, the Project Site is located in a dense, urbanized area near local-serving commercial retail, restaurant, and supermarket uses within walking distance that would promote non-automobile trips and pedestrian activity.</p>
<p>Policy 11-1.3: Require that proposals for major non-residential development projects include submission of a TDM Plan to the City.</p>	<p>No Conflict. The Project would submit its TDM Program to the City for approval.</p>

Table IV.M-3 (Continued)
Potential for Project to Conflict with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
<p>Policy 11-1.4: Support the provision of bicycle facilities in all new development.</p>	<p>No Conflict. The Project would provide on-site bicycle parking and services, such as repair stands, showers, and lockers, to encourage bicycling for employees and visitors to the Project Site. The Mobility Hubs would also provide space for bike-share facilities, bicycle rentals, and other similar services that may be available in the future. In addition a protected class IV bikeway would also be provided along Radford Avenue adjacent to the Project Site consistent with the 2010 Bicycle Plan.</p>
<p>Policy 11-2.2: Require sidewalks with new roadway construction and substantial reconstruction of existing roadways.</p>	<p>No Conflict. Sidewalks would be included as part of the Project's Radford Bridge construction. The Project would not involve substantial reconstruction of existing roadways.</p>
<p>Policy 12-1.1: Install ATSAC equipment at an accelerated rate with expanded funding.</p>	<p>No Conflict. The majority, if not all, of the signalized intersections within the City are currently equipped with both Automated Traffic Surveillance and Control (ATSAC) equipment and Adaptive Traffic Control System (ATCS). While this policy applies to the City and not development projects, the Applicant would contribute toward transportation systems management (TSM) improvements and signal upgrades within the vicinity of the Project Site to improve LADOT's capability to monitor and improve traffic operations on City streets.</p>
<p>Policy 13-1.1: To the extent feasible and consistent with the Mobility Plan's and the Community Plans' policies promoting multi-modal transportation (e.g., walking, bicycling, driving, and taking public transit) and safety, maintain a satisfactory LOS for streets that should not exceed LOS "D" for Boulevards, Avenues, and Collector Streets. If existing levels of service are LOS "E" or LOS "F" on a portion of an arterial or collector street, then the level of service for future growth should be maintained at LOS "E", where feasible and consistent with the Mobility Plan.</p>	<p>No Conflict. Pursuant to SB 743, the CEQA transportation analysis methodology was changed from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via a VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Nevertheless, Section 5B of the Transportation Assessment details the non-CEQA LOS operations at the 32 study intersections that were evaluated.</p> <p>With regard to this policy's intent to promote multi-modal transportation, the Project would provide pedestrian enhancements around the Project Site, including landscaping, sidewalk and crosswalk improvements, and bus stop improvements. Additionally, the Project's Radford Bridge would enhance pedestrian and bicycle access and connections to nearby transit services. Refer to the discussion for Policy 11-1.1, above, regarding the proposed Mobility Hubs and the Project's TDM strategies to encourage alternative modes of transportation.</p>
<p>Policy 13-1.2: Street dedications shall be developed in accordance with standards and criteria contained in the Mobility Plan, an element of the General Plan and the City's Standard Street Dimensions, except where environmental issues and planning practices</p>	<p>No Conflict. The Project would be consistent with the intent of the Mobility Plan. The Project would maintain roadway widths in accordance with Mobility Plan standards. The Applicant is requesting a waiver of dedication but would provide a three-foot sidewalk easement to widen the existing sidewalk along Radford Avenue. The request for waivers</p>

Table IV.M-3 (Continued)
Potential for Project to Conflict with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
warrant alternate standards consistent with capacity requirements.	would be reviewed by City staff as part of the Project's entitlements.
Policy 13-1.3: Discourage non-residential traffic flow for streets designed to serve residential areas only by the use of traffic control measures.	No Conflict. The Project is designed to discourage non-residential traffic flow through residential streets with the installation of traffic control measures as part of the proposed Radford Bridge. In addition, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to minimize potential cut-through trips on affected residential streets.
Policy 13-1.4: New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking,	No Conflict. The proposed driveways would be located along Radford Avenue and Colfax Avenue, which currently provide vehicular access to the Project Site. The proposed driveway at Carpenter Avenue would be located along an alley to minimize disturbance to existing traffic flow along major arterials (i.e., Ventura Boulevard). In addition, the Radford Bridge would improve access and traffic flow to the Project Site. The Project would include sufficient parking to meet the needs of employees and visitors at the Project Site, which would be accessible from all of the signalized driveways. Furthermore, the Project's anticipated queues entering the Project driveways would not extend into the public rights-of-way and would not substantially affect through traffic along adjacent corridors. All security gates would be located to provide adequate queuing areas that would meet City requirements and Project demand, thereby ensuring that vehicles do not queue on the public streets.
Policy 13-2.1: No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map, or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project.	No Conflict. Under the proposed Specific Plan, the Project would include up to 2,200,000 square feet of studio-related uses. As discussed under Policy 13-1.1, pursuant to SB 743, the CEQA transportation analysis methodology was changed from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via the VMT methodology. As discussed below under Threshold (b), VMT impacts would be less than significant. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Nevertheless, Section 5B of the Transportation Assessment details the non-CEQA LOS operations at the 32 study intersections that were evaluated. The operational analysis of the transportation system and the traffic generated by the Project is provided in Section 5B of the Transportation Assessment. The Project will be fully reviewed by City departments, the City Planning Commission, and City Council prior to a decision being made.

Table IV.M-3 (Continued)
Potential for Project to Conflict with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
<p>Policy 13-2.2: Driveway access points onto arterial and collector streets should be limited in number and be located to insure the smooth and safe flow of vehicles and bicycles.</p>	<p>No Conflict. The roadways surrounding the Project Site are designated Avenues II, and any existing and proposed driveways would be located along these roadways. Nonetheless, any modifications to the driveways would be designed to minimize vehicle conflicts with other vehicles, pedestrians, and bicyclists. Additionally, the Project would provide a restored driveway at Carpenter Avenue along the adjacent public alley and along Radford Avenue south of Moorpark Street via the proposed Radford Bridge, thereby distributing vehicles more evenly along the street frontages and across the Project Site. The design of all Project vehicular access points would be subject to the review and approval of LADOT and BOE.</p>
<p>Policy 14-1.1: Assure that local bicycle facilities are identified and linked with facilities of neighboring areas of the City.</p>	<p>No Conflict. Bicycle lanes are provided along both sides of Colfax Avenue immediately north of the Project Site's existing vehicular access point. As part of the Project, a protected bikeway consistent with the 2010 Bicycle Plan would also be provided along Radford Avenue adjacent to the Project Site through the proposed modification of the street classification from Avenue II to Modified Avenue II.</p>
<p>Policy 14-1.2: Encourage the provision of showers, changing rooms and bicycle storage at new and existing non-residential developments and public places.</p>	<p>No Conflict. The Project would provide on-site bicycle parking and services, such as repair stands, showers, and lockers, to encourage bicycling for employees and visitors to the Project Site. The Mobility Hubs would also provide space for bike-share facilities, bicycle rentals, and other similar services that may be available in the future.</p>
<p>Policy 14-2.1: Identify pedestrian oriented areas.</p>	<p>No Conflict. The Project Site is not located within the pedestrian oriented areas as identified in the Ventura/Cahuenga Boulevard Corridor Specific Plan. However, the Project would improve pedestrian oriented areas by enhancing the public areas along the Project frontages, as discussed in further detail in Policy 2-3.1 above.</p>
<p>Policy 15-1.1: Consolidate parking, where appropriate, to minimize the number of ingress and egress points onto arterials.</p>	<p>No Conflict. The Project would include subterranean and above-grade parking structures on-site to meet the needs of employees and visitors and consolidate the primary parking garages in the North and South Lots. In addition, vehicles would be able to access the entire Project Site through internal roadway connections to minimize local off-site circulation. Furthermore, the Mobility Hubs would also provide consolidated locations for passenger loading areas to limit activity in the public right of way.</p>
<p>Policy 15-1.3: New parking lots and new parking garages shall be developed in accordance with design standards.</p>	<p>No Conflict. The Project would construct new parking lots and garages in accordance with applicable City design standards.</p>

Table IV.M-3 (Continued)
Potential for Project to Conflict with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Objective, Policy, Program, or Plan ^b	Analysis of Project Consistency
<p>^a Additional Community Plan objectives and policies that are applicable to the Project are discussed in Section IV.J, Land Use and Planning, and Table 4 of Appendix M of this Draft EIR.</p> <p>^b Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Los Angeles Department of City Planning, 2001.</p> <p>Source: Gibson Transportation Consulting, Inc., 2025.</p>	

(c) Plan for a Healthy Los Angeles

A detailed analysis of the Project’s potential to conflict with the policies in the Plan for a Healthy Los Angeles related to transportation is provided in Table IV.M-4 beginning on page IV.M-54. In summary, the Project would promote healthy living by encouraging the use of active travel modes. As discussed below, the on-site Mobility Hubs would support multi-modal mobility options, such as bike amenities and bike share services, to improve the convenience of making trips without the use of a personal automobile. Further, the Project supports healthy lifestyles by expanding employment opportunities in a TPA in proximity to residential areas, commercial destinations, and other neighborhood serving retail uses near transit, providing on-site bicycle amenities, and enhancing bicycle facilities adjacent to the Project Site that would allow employees to travel via alternative transportation modes that are environmentally sustainable and physically beneficial. The Project would also enhance the pedestrian environment with expanded pedestrian facilities and landscaping elements surrounding the Project Site for a more comfortable environment for pedestrians. The Project would also provide pedestrian and bicycle connections from the current terminus of Radford Avenue to Moorpark Street via the proposed Radford Bridge and Class IV protected bikeway along Radford Avenue. Finally, as discussed further below under Threshold (b), the Project is estimated to generate lower work VMT per employee than the average for the area. Because VMT directly contributes to GHG emissions, the Project would also generate lower GHG per capita than the area average. Therefore, the Project would not conflict with and would not obstruct the implementation of the policies set forth in the Plan for a Healthy Los Angeles.

(d) Los Angeles Municipal Code

LAMC Section 12.21 A.16 sets forth bicycle parking requirements for new developments. The Project would meet the LAMC requirements for on-site bicycle parking supply and would also provide showers, lockers, and bicycle service areas. Thus, the Project is consistent with LAMC Section 12.21 A.16.

**Table IV.M-4
Project Consistency with the Plan for a Healthy Los Angeles**

Objective, Policy, Program, or Plan ^a	Would the Project conflict?
Chapter 1: Los Angeles, a Leader in Health and Equity	
<p><u>Policy 1.5 Plan for Health</u></p> <p>Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.</p>	<p>No Conflict. The Project supports initiatives to create transit-oriented developments by expanding employment opportunities and improving the jobs/housing balance in a designated TPA. The Project would provide bicycle parking and amenities to encourage bicycling for employees and visitors to the Project Site. The Project also includes open space and landscaping improvements to enhance the public areas along the perimeter of the Project Site and pedestrian and bicyclist access to the Los Angeles River and Tujunga Wash. Furthermore, the proposed Radford Bridge, extending from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street, would provide pedestrian and bicycle routes across the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the Los Angeles River trail system. Along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with two Class IV bikeways. The Project would also provide multi-modal mobility options via the Mobility Hubs offering a better connection to existing and future transit options.</p>
<p><u>Policy 1.7 Displacement and Health</u></p> <p>Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.</p>	<p>No Conflict. The Project would provide employment and entrepreneurial opportunities through its continuation and expansion of existing studio-related uses and public-serving retail space. The Project would not displace any existing housing as no housing currently exists on the Project Site. Furthermore, the Project would not displace any existing residents, tenants, or services from the surrounding areas as the Project would not cause the removal of any off-site uses.</p>
Chapter 2—A City Built for Health	
<p><u>Policy 2.1 Access to Goods and Services</u></p> <p>Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.</p>	<p>No Conflict. The Project would provide up to 25,000 square feet of public-serving retail space on the ground level of the Project Site, easily accessible by foot from the surrounding residential neighborhoods.</p>

Table IV.M-4 (Continued)
Project Consistency with the Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan ^a	Would the Project conflict?
Chapter 5—An Environment Where Life Thrives	
<p><u>Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction</u></p> <p>Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.</p>	<p>No Conflict. The Project is estimated to generate lower work VMT per employee than the average for the South Valley APC area, as demonstrated further below in this section. Furthermore, the Project would implement a TDM Program, described in Project Design Feature TR-PDF-2, to further reduce VMT per capita. VMT directly contributes to GHG emissions, so the Project would also generate lower GHG per capita than the area average.</p>
<p>^a Objectives, Policies, Programs, or Plans based on information provided in Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Los Angeles Department of City Planning, March 2015).</p> <p>Source: Gibson Transportation Consulting, Inc., 2025.</p>	

The City's TDM Ordinance, set forth in LAMC Section 12.26 J, establishes trip reduction requirements for non-residential projects in excess of 25,000 square feet, such as the Project. Applicable requirements of the TDM Ordinance include providing a bulletin board or display case of transportation information, carpool/vanpool loading and designated parking areas, pathways or safe routes from development buildings to public sidewalks, and, if determined necessary by LADOT or the local transit agency, improved bus stops. The Project would comply with the requirements of the TDM Ordinance through the Project's design and TDM Program that includes the following measures, as further detailed above in Project Design Feature TR-PDF-2:

- Educational Programs/On-Site Coordinator
- Transportation Information Center/Kiosks
- Carpool/Vanpool Parking and Loading
- Bicycle and Pedestrian Amenities
- First-Mile/Last-Mile Options
- Ride-Share Matching, Carpool/Vanpool, Guaranteed Ride Home Programs
- Neighborhood Enhancements

With regard to parking, the Specific Plan would establish parking requirements for the permitted land uses (i.e., sound stage, production support, production office, general office,

and retail uses), ranging from two to three parking spaces per 1,000 square feet of floor area, for a sitewide total of approximately 6,050 parking spaces upon full buildout of the total floor area permitted under the proposed Specific Plan. Non-occupiable structures, such as sets/façades, kiosks, and parking/entry facilities, would not provide dedicated parking. Vehicles could be parked in tandem (double or triple) or by valet, depending on the specific parking layout. In addition, the Specific Plan would set forth a process for approval and implementation of a reduced/shared parking plan, so long as an adequate parking supply is maintained. In addition, parking may be located in a combination of above-ground parking structures, subterranean structures, and/or surface spaces at any location within the Project Site provided the Specific Plan's parking requirements are met.

With regard to potential traffic hazard impacts associated with signage, LAMC Section 14.4.5 A states that no sign or sign support structure shall be erected, constructed, painted, or maintained, and no permit shall be issued if the sign or sign support structure, because of its location, size, nature, or type, constitutes a hazard to the safe and efficient operation of vehicles upon a street or a freeway, or creates a condition that endangers the safety of persons or property. The Project would not include digital signage visible from the surrounding roadways, and any signage visible from the surrounding roadways would comply with this requirement. Thus, the Project would comply with LAMC Section 14.4.5 A.

Based on the above, the Project would meet the applicable LAMC requirements.

(e) Vision Zero

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The Project Site is not located adjacent to any roadways that have been identified as part of the HIN. Additionally, no active Vision Zero Safety Improvements projects are planned adjacent to or within the Project Site vicinity. The closest streets that are identified in the HIN are Laurel Canyon Boulevard between Ventura Place and Ventura Boulevard and Ventura Boulevard west of Carpenter Avenue. The Project's improvements to the pedestrian environment would not preclude any future Vision Zero safety improvements by the City. Furthermore, the Project would enhance pedestrian and bicycle safety with improvements, such as pedestrian areas along the Project Site frontages, a new bikeway along Radford Avenue, and enhanced pedestrian and bicyclist access to the Los Angeles River and Tujunga Wash. Therefore, the Project would not conflict with Vision Zero.

(f) Citywide Design Guidelines

A detailed discussion of how the Project would promote each of the Citywide Design Guidelines is provided in Section IV.J, Land Use and Planning, of this Draft EIR. As detailed therein, the Project would not conflict with the applicable Citywide Design Guidelines related to transportation.

(g) Other Plans and Policies

As discussed in detail in Section IV.J, Land Use and Planning, of this Draft EIR, the Project would not conflict with the 2024–2050 SCAG RTP/SCS policies related to encouraging pedestrian activity and reducing VMT. As indicated therein, the Project would improve mobility and accessibility, encourage transit use, and reduce VMT and GHG emissions. These would be achieved by intensifying urban density within an area in close proximity to transit and destinations; providing complementary new uses (i.e., general office, production) in close proximity to existing residential, retail, and restaurant uses; providing pedestrian and bicycle improvements; providing EV charging stations; implementing TDM measures; supporting healthy and equitable communities by encouraging walking and bicycling; providing public realm improvements (i.e., new street trees, native grasses and shrubs, bicycle parking and supporting amenities, etc.); and incorporating sustainability features in accordance with the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards, which would support resource efficiency by conserving water and energy.

(h) Conclusion

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

(2) Mitigation Measures

Project-level impacts related to the consistency with adopted City plans, programs, ordinances and policies regarding the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the consistency with adopted City plans, programs, ordinances, and policies regarding circulation 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

Table IV.M-5 on page IV.M-58 summarizes the results of the analysis using the VMT Calculator. It includes estimates of gross daily vehicle trips and total VMT, the total estimated

**Table IV.M-5
Project VMT Analysis Summary**

Project Information^a	
Address	4200 N. Radford Avenue
Area Planning Commission	South Valley
Travel Behavior Zone (TBZ) ^b	Compact Infill
Maximum VMT Reduction ^c	40%
VMT Analysis^a	
Project Land Uses	
Sound Stage	450,000 sf
Production Support	300,000 sf
Production Office	725,000 sf
General Office	700,000 sf
Retail	25,000 sf
Employee Population ^d	8,920
Work VMT	
Total Work VMT ^e	55,610
Work VMT per Employee ^f	6.2
Impact Threshold	11.6
Significant Impact	No
<p><i>sf = square feet</i></p> <p>^a The gross total Project Analysis is from LADOT VMT Calculator Version 1.4 (June 2023) output reports provided in Appendix D of the Transportation Assessment. A custom land use was developed for the studio and office-related uses based on information in Tables 10A and 10B of the Transportation Assessment, included as Appendix O.1 of this Draft EIR.</p> <p>^b A "Compact Infill" TBZ is characterized in the City of Los Angeles VMT Calculator Documentation as higher density neighborhoods that include multi-story buildings and well connected streets.</p> <p>^c The maximum allowable VMT reduction is based on the Project's designated TBZ.</p> <p>^d Total employee population estimates include studio, production, and office employment estimates detailed in Table 10B of the Transportation Assessment, included as Appendix O.1 of this Draft EIR. Retail employment factors are detailed in City of Los Angeles VMT Calculator Documentation (LADOT and DCP, May 2020).</p> <p>^e The VMT forecasts incorporate VMT reductions associated with the implementation of certain TDM strategies as part of the Project, including the provision of LAMC-required bicycle parking and promotions and marketing of alternative transportation options and choices.</p> <p>^f Work VMT per Employee is based on the "home-based work attraction" trip types.</p> <p>Source: Gibson Transportation Consulting, Inc., 2025.</p>	

employee population, the significance thresholds for the South Valley APC, and the calculation of the Project's VMT per employee. As shown in Table IV.M-5, the Project would generate approximately 55,610 total daily work VMT. As a result, the Project would generate

an average work VMT per employee of 6.2, which falls below the significance threshold for the South Valley APC area (11.6 work VMT per employee). As previously noted, the additional TDM measures would further reduce VMT per employee.

The analysis above considers the VMT impacts associated with the proposed development program detailed in Table II-1 in Section II, Project Description, of this Draft EIR. As discussed in Section II, Project Description, the proposed Specific Plan would allow for limited exchanges between certain permitted studio land uses and associated floor areas that accounts for the special needs of the Project Site and allows for adapting to and addressing potential future changes in technology and space requirements inherent to the rapid pace of entertainment technology's advancement. Accordingly, the Specific Plan would allow for the limited increase in sound stages and production support uses for an equivalent decrease in the floor area of other permitted uses, provided that the maximum permitted floor area of 2,200,000 square feet is not exceeded. Specifically, sound stage floor area may be increased by up to 125,000 square feet (from 450,000 square feet to up to 575,000 square feet) in exchange for equivalent decreases in the floor area of other uses, and production support floor area may be increased by up to 275,000 square feet (from 300,000 to up to 575,000 square feet) in exchange for equivalent decreases in the floor area of other uses. As shown in Table F-1 of Appendix O.1, four exchange scenarios were evaluated that account for the maximum land use exchanges. Tables F-2 and F-3 of Appendix O.1 provide the VMT results, and the daily trip estimates, respectively, for these exchange scenarios. As shown in Table F-2 of Appendix O.1, the land use exchange that generates the greatest VMT per employee is the exchange of 275,000 square feet of sound stages to production support uses (Land Use Exchange Scenario 2). This land use exchange scenario would result in a VMT per employee ratio of 6.8, which would be below the impact threshold of 11.6. Thus, with implementation of the limited land use exchanges, the Project's VMT impact would be less than significant.

Based on the above, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Thus, the Project's VMT impact would be less than significant.

(2) Mitigation Measures

The Project's VMT impact would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

The Project's VMT impact would be less than significant. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

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

(1) Impact Analysis

(a) Geometric Design Feature

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would not include hazardous geometric design features. In addition, the Project would not introduce any incompatible uses as the Project involves the continuation of the existing studio use. **As such, as determined in the Initial Study, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and the impact would be less than significant. No further analysis of this issue is required.**

(b) Freeway Safety Analysis

As discussed above, Section 2.4.4 of the TAG provides guidance on freeway safety analyses for land use proposals that are required to prepare a transportation assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.

Based on the Project's trip generation estimate and traffic distribution pattern, which was reviewed and approved by LADOT, the Project would add 25 or more peak hour trips to the following off-ramps during the A.M. and P.M. peak hours:

- US-101 Northbound Off-Ramp to Laurel Canyon Boulevard (A.M. peak hour)
- US-101 Southbound Off-Ramp to Laurel Canyon Boulevard (A.M. and P.M. peak hours)
- SR-170 Southbound Off-Ramp to Riverside Drive (A.M. peak hour)
- SR-134 Westbound Off-Ramp to Lankershim Boulevard (A.M. peak hour)

In accordance with the Freeway Guidance, the 95th percentile ramp queue was calculated using the Highway Capacity Manual (HCM) methodology. Conditions were analyzed for the anticipated Project buildout year of 2028 and the long-term buildout year of 2045, which includes growth and traffic from related projects, both with and without Project

trips. As detailed in the Transportation Assessment, under Future with Project Conditions (Year 2028) and Future with Project Conditions (Year 2045), none of the four analyzed off-ramps would have queues that both exceed the ramp storage length and include Project-related trips that would add 50 feet or more to any queue during any of the analyzed peak hours compared to Future without Project Conditions (Year 2028 and Year 2045). Therefore, the Project would not be subject to a speed differential analysis or cause an adverse safety condition, and impacts would be less than significant. Nonetheless, the Project would implement a TDM Program to reduce single-occupancy vehicle trips to and from the Project Site.

Based on the above, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts, including freeway safety impacts, would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, while it is expected that the majority of Project construction activities would be confined to the Project Site, limited off-site construction activities may occur within adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access, as discussed in Project Design Feature TR-PDF-1. As stated therein, a detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval prior to commencing construction. The Construction Traffic Management Plan will formalize how Project construction will be carried out and identify specific actions that will reduce effects on the surrounding community. In particular, the Applicant will designate a construction manager

to serve as a liaison with the surrounding community and respond to any construction-related inquiries. In addition, while operation of the Project would generate vehicle trips in the Project vicinity and would result in limited modifications to Project Site access, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. The proposed Radford Bridge would also provide additional access for emergency vehicles. **As such, as determined in the Initial Study, the Project would not result in inadequate emergency access. Thus, impacts related to inadequate emergency access would be less than significant, and no further analysis of this issue is required.**

Refer also to Section IV.G.1, Public Services—Fire Protection, of this Draft EIR for an analysis of emergency access specific to fire protection services.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, as previously discussed, the Transportation Assessment assumes the completion of construction in year 2028 under the most conservative analysis, including buildout of all related projects by then, and also analyzes buildout under the long-term scenario to be comprehensive. Furthermore, with the exception of the freeway safety analysis, discussed above, the Project's impact analyses per the CEQA Guidelines Appendix G transportation thresholds and the TAG are not dependent upon the Project buildout date, and, therefore, the results and conclusions presented herein are equally applicable to a long-range completion date. As such, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

(a) Consistency with Transportation Plans and Policies

In addition to potential Project-specific impacts, the TAG requires that the Project be reviewed in combination with nearby related projects to determine if there may be a cumulatively significant impact resulting from inconsistency with a particular program, plan, policy, or ordinance. In accordance with the TAG, the cumulative analysis must include

consideration of any related projects within 0.5 miles of the Project Site and any transportation system improvements in the vicinity. Table II-1 in Section III, Environmental Setting, of this Draft EIR identifies the related projects located within 0.5 miles of the Project Site. None of the related development projects are located along the same block as the Project. In addition, each of the related projects would be separately reviewed and approved by the City, including a review of their consistency with applicable programs, plans, policies, and ordinances. **Therefore, the Project, together with the related projects, would not result in cumulatively considerable impacts associated with inconsistencies with transportation-related programs, plans, policies, and ordinances, and cumulative impacts would be less than significant.**

(b) Vehicle Miles Traveled

As discussed in more detail in the Transportation Assessment, a development project would have a cumulative VMT impact if it is inconsistent with the RTP/SCS, the regional plan to reach state air quality and GHG reduction targets. As detailed in the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less-than-significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact as those projects are already shown to align with the long-term VMT and GHG goals of the RTP/SCS. As described above, the Project would not result in a significant VMT impact. Further, the Project would be designed to further reduce single occupancy trips to the Project Site through various TDM strategies that would be incorporated as part of the Project design, including provisions of LAMC-required bicycle parking and promotions and marketing of alternative transportation modes and choices. Furthermore, the Project Site is well-served by various local bus lines, and the proposed Mobility Hubs would contribute to the productivity and use of the regional transportation system in line with the RTP/SCS goals. **Therefore, the cumulative impacts of the Project with respect to VMT would be less than significant.**

(c) Freeway Safety

As discussed in the Project-level analysis under Threshold (c) above, under Future with Project Conditions (Year 2028) and Future with Project Conditions (Year 2045), none of the four analyzed off-ramps would have queues that both exceed the ramp storage length and include Project-related trips that would add 50 feet or more to any queue during any of the analyzed peak hours compared to Future without Project Conditions (Year 2028 and Year 2045). Therefore, the Project would not be subject to a speed differential analysis or cause an adverse safety condition, and impacts would be less than significant.

As discussed above, Section 2.4.4 of the TAG provides guidance on freeway safety analyses for land use proposals that are required to prepare a transportation assessment. Specifically, a project would not have the potential to result in significant freeway safety

impacts unless it adds 25 or more trips to any off-ramp in either the A.M. or P.M. peak hour. As such, some of the related projects would not exceed this screening threshold at any area off-ramps, and would result in impacts to freeway safety that would be less than significant. Other related projects that would add 25 or more trips to any area off-ramp would be subject to a queuing analysis, and if it is determined that potentially significant impacts would occur, mitigation measures would be included for that related project to address impacts. **Therefore, Project impacts related to freeway safety would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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