IV. Environmental Impact Analysis
K. Transportation

1. Introduction

This section analyzes the Project's potential impacts related to transportation. The analysis is primarily based on the Transportation Assessment for the Television City 2050 Specific Plan Project (Transportation Assessment) prepared for the Project in October 2021 and the Supplemental VMT Analysis Memo for the Television City 2050 Project (Supplemental VMT Memo) prepared in March 2022, included in their entirety in Appendix M.1 and Appendix M.3, respectively, of this Draft EIR.[1,2]

The analysis of vehicle miles traveled (VMT) is based on the Transportation Assessment and the Supplemental VMT Memo. The Transportation Assessment was prepared pursuant to the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (July 2020), which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment was approved by LADOT on November 16, 2021. In addition, LADOT concurred with the findings of the Supplemental VMT Memo on March 17, 2022. Copies of LADOT's approvals for the Transportation Assessment, the Supplemental VMT Memo, and the proposed haul route are included with each document in Appendix M.2, Appendix M.4, and Appendix M.5, respectively, of this Draft EIR.

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1 Gibson, Transportation Assessment for the Television City 2050 Specific Plan Project, Los Angeles, California, October 2021.

2 Gibson, Supplemental VMT Memo for the Television City 2050 Project, Los Angeles, California, March 9, 2022.

2. Environmental Setting

a. Regulatory Framework

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

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

(1) Federal

(a) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits

discrimination based on disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

(2) State

(a) Complete Streets Act

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

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

(b) Assembly Bill 32 and Senate Bill 375

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

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

There are five major components to SB 375. First, regional GHG emissions targets: California ARB’s Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State.

These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

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

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

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

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

(c) California Vehicle Code

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

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar

measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

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

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

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, Determining the Significance of Transportation Impacts. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop[3] or a stop along an existing high-quality transit corridor[4] should be

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

presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (July 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the 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 towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016–2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for four percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours.

[4] "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.

TPAs are PGAs that are within 0.5 mile of a major transit stop that is existing or planned. Job centers are defined as areas with significantly higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

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

(4) Local

(a) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[5] 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;

[5] 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.

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

(5) Clean Environments and Healthy Communities.

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

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

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

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

The Project Site is located within the Wilshire Community Plan area. 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.H, Land Use and Planning, of this Draft EIR.

> Objective 10-1: Continue to encourage improved and additional local and express bus service and neighborhood shuttles throughout the Wilshire Community Plan Area.
>
> Policy 10-1.1: Continue to coordinate with the Metropolitan Transportation Authority (MTA) and the Los Angeles Department of Transportation

(LADOT) with plans to improve local and express bus service serving Wilshire.

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.

Objective 10-2: Increase work trips and non-work trips made on public transit.

Policy 10-2.1: Develop coordinated intermodal public transit plans to implement linkages to future public transit services.

Objective 11-1: Promote an adequate system of Bikeways for commuter, school and recreational use.

Policy 11-1.1: Encourage funding and construction of bikeways to connect residential neighborhoods to schools, open space areas, and employment centers.

Policy 11-1.2: Provide Bikeways along Boulevards II and Avenues in the Wilshire Community Plan Area.

Policy 11-1.3: Assure that local bicycle facilities are linked with the facilities of neighboring areas of the City.

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

Objective 11-2: Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers.

Policy 11-2.1: Encourage the safe utilization of public utility easements and other public rights-of-way along streets wherever feasible for the use of pedestrians.

Policy 11-2.3: Protect and improve existing pedestrian-oriented street segments.

Objective 12-1: Pursue Transportation Demand Management Strategies that maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

Policy 12-1.1: Encourage non-residential developments to provide employee incentives for using alternatives to the automobile (carpools, van pools, buses, shuttles, subways, bicycles, walking) and provide flexible work schedules.

Policy 12-1.2: Encourage the use of Multiple-Occupancy Vehicle programs for shopping and other non-work activities to reduce midday, evening, and special event traffic.

Policy 12-1.3: Require that proposals for major non-residential development projects include submission of a TDM Plan to the City.

Policy 12-1.4: Promote the development of transportation facilities and services that encourage higher transit ridership, increased vehicle occupancy, and improved pedestrian and bicycle access.

Objective 13-1: Increase traffic capacity on existing freeways and streets, through policy changes, and minor physical improvements to existing streets.

Policy 13-1.1: Install Automated Traffic Surveillance and Control (ATSAC) equipment at all signalized intersections in the Wilshire Community Plan Area.

Policy 13-1.2: Install an Adaptive Traffic Control System (ATCS) at all intersections along Boulevards II and Avenues, and some Collector Streets to improve intersection capacity by an additional 3%. This upgrade of the existing ATSAC system provides an additional capacity enhancement beyond that of ATSAC.

Policy 13-1.3: Implement or enhance “Smart Corridors” to coordinate Caltrans’ freeway traffic management system, with the ATSAC/ATCS street traffic signal management system to enhance incident management and motorist information, and thereby reduce traffic delays.

Policy 13-1.5: Identify and implement intersection improvements (channelization, turn lanes, signal modifications) on all Boulevards II and Avenues, and along some Collector Streets, throughout the Wilshire Community Plan Area.

Objective 14-1: Initiate and continue existing Residential Neighborhood Protection Plans to mitigate traffic and parking impacts throughout the Wilshire Community Plan Area.

Policy 14-1.1: The City Planning Department and LADOT should continue to work closely with the Wilshire Community Plan Area residents to identify existing and anticipated “cut-through” traffic and spillover parking from adjacent commercial areas. Through neighborhood community meetings, traffic calming programs and strategies should be developed for effective Residential Neighborhood Protection Plans.

Policy 14-1.2: Support and research emerging traffic calming techniques as potential traffic mitigation factors in impacted residential neighborhoods.

Objective 15-1: Provide off-street parking in appropriate locations in accordance with Citywide standards and community needs.

Policy 15-1.1: Minimize the number of ingress and egress points to and from all Boulevards II and Avenues in the Wilshire Community Plan Area.

Policy 15-1.2: Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.

Policy 15-1.3: Manage the supply of on-street parking to provide convenient parking for customers of commercial land uses and to encourage employees to park in off-street lots or garages or use alternate modes of transportation.

Objective 16-1: To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable Levels of Service (LOS) and ensure that necessary Freeway and Street access and improvements are provided to accommodate additional traffic anticipated from Wilshire Community Plan land use changes and/or by new development.

Policy 16-1.1: To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multimodal transportation (e.g., walking, bicycling, driving and taking public transit) and safety, maintain a satisfactory Level of Service (LOS) above LOS "D" for Boulevards IIs, especially those which serve Regional Commercial Centers and Community Commercial Centers; and above LOS "D" for Avenues and Collector Streets.

Policy 16-1.2: Streets should be developed in accordance with standards and criteria contained in the Transportation Element of the General Plan and consistent with the City's Standard Street Dimensions. In some cases, exceptions may exist where significant environmental issues and/or sound planning practices may warrant alternate standards, consistent with street performance standards and traffic flow volume capacity requirements.

Objective 16-2: Ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.

Policy 16-2.1: No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations: The transportation infrastructure serving the project site and surrounding area, presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the

existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.

(c) Los Angeles Municipal Code

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

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

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

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

(d) LADOT Transportation Assessment Guidelines

On July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model, and transportation impact thresholds based on VMT, pursuant to

CEQA Guidelines Section 15064.3 and the 2019 CEQA updates that implement SB 743. The City established the Transportation Assessment Guidelines (TAG) that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[6]

(e) LADOT Manual of Policies and Procedures Section 321

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

(f) Vision Zero

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

[6] LADOT, Transportation Assessment Guidelines, July 2020.

(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.[7] Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b. Existing Conditions

Based on consultation with LADOT and 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 31 intersections, including 28 signalized intersections and three unsignalized intersections located at existing or proposed Project driveways, as listed in Table 2 and illustrated in Figure 6 of the Transportation Assessment. The following discussion describes the key streets, transportation facilities, and transit routes serving the

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

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

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

(a) Streets and Highways

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

- Crescent Heights Boulevard is a designated Modified Avenue III that travels in the north-south direction and is located approximately 0.25 mile west of the Project Site. It provides four travel lanes, two in each direction. Travel lanes are typically 10 to 11 feet wide, and the total paved width is approximately 42 to 43 feet. Metered and unmetered on-street parking with permit exemptions is generally available on the west side of the street with morning peak hour restrictions and on the east side of the street with afternoon peak hour restrictions within the Study Area.

- Laurel Avenue is a designated Local Street that travels in the north-south direction and is located approximately 1,000 feet west of the Project Site. It is an undivided two-way street with total paved width of approximately 36 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Edinburgh Avenue is a designated Local Street that travels in the north-south direction and is located approximately 700 feet west of the Project Site. It is an undivided two-way street with total paved width of approximately 36 to 40 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Hayworth Avenue is a designated Local Street that travels in the north-south direction and is located approximately 400 feet west of the Project Site. It is an undivided two-way street with a total paved width of approximately 36 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Fairfax Avenue is a designated Avenue II that travels in the north-south direction and is located along the western boundary of the Project Site. It provides five travel lanes within the Study Area, including two in each direction and a two-way left-turn median. Travel lanes are typically 10 feet wide, and the total paved

width varies from approximately 55 to 68 feet. Metered on-street parking is generally available on both sides of the street north of Beverly Boulevard and on the west side of the street south of Beverly Boulevard within the Study Area. Existing access to the Project Site is provided along Fairfax Avenue.

- Orange Grove Avenue is a designated Local Street that travels in the north-south direction and intersects Beverly Boulevard on the northern boundary of the Project Site. It is an undivided two-way street with a total paved width of approximately 30 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Ogden Drive is a designated Local Street that travels in the north-south direction and intersects Beverly Boulevard on the northern boundary of the Project Site. It is an undivided two-way street with a total paved width of approximately 30 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Genesee Avenue is a designated Local Street that travels in the north-south direction and intersects Beverly Boulevard on the northern boundary of the Project Site. It is an undivided two-way roadway with a total paved width of approximately 30 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area. Existing signalized access to the Project Site is provided along Beverly Boulevard at the southern terminus of Genesee Avenue.

- Spaulding Avenue is a designated Local Street that travels in the north-south direction and intersects Beverly Boulevard on the northern boundary of the Project Site. It is an undivided two-way street with a total paved width of approximately 30 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Stanley Avenue is a designated Local Street that travels in the north-south direction and is aligned with the eastern border of the Project Site. It is an undivided two-way street with total paved width of approximately 30 feet. Unmetered on-street parking is generally available on both sides of the street within the Study Area. The roadway becomes The Grove Drive south of Beverly Boulevard.

- The Grove Drive is a designated Collector Street that travels in the north-south direction and is located along the eastern boundary of the Project Site. It provides four to five travel lanes, including two in each direction and a two-way left-turn median south of the Project Site. Travel lanes are typically 10 feet wide, and the total paved width varies from approximately 50 to 54 feet. Parking is prohibited on the street adjacent to the Project Site.

- Curson Avenue is a designated Local Street that travels in the north-south direction and is located approximately 600 feet east of the Project Site. It is an

undivided two-way road with a total paved width of approximately 28 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Sierra Bonita Avenue is a designated Local Street that travels in the north-south direction and intersects Beverly Boulevard approximately 900 feet east of the Project Site. It is an undivided two-way street with a total paved width of approximately 30 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Gardner Street is a designated Local Street that travels in the north-south direction and is located approximately 0.25 mile east of the Project Site. It is an undivided two-way road with a total paved width of approximately 30 feet north of Beverly Boulevard and 36 feet south of Beverly Boulevard. Daytime unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Vista Street is a designated Local Street that travels in the north-south direction and is located approximately 0.3 mile east of the Project Site. It is an undivided two-way street with a total paved width of approximately 30 feet. Unmetered on-street parking with permit exemptions is generally available on both sides of the street within the Study Area.

- Rosewood Avenue is a designated Collector Street that travels in the east-west direction and is located approximately 0.28 mile north of the Project Site. It is an undivided two-way road with a total paved width of approximately 30 feet. Unmetered on-street parking is generally available on both sides of the street east of Fairfax Avenue within the Study Area.

- Oakwood Avenue is a designated Local Street that travels in the east-west direction and is located approximately 800 feet north of the Project Site. It is an undivided two-way road with a total paved width of approximately 30 feet. Unmetered on-street parking is generally available on both sides of the street within the Study Area.

- Beverly Boulevard is a designated Modified Avenue I that travels in the east-west direction and is located along the northern boundary of the Project Site. It provides four travel lanes, two in each direction, and left-turn lanes at most intersections. Travel lanes are typically 10 feet wide, and the total paved width is approximately 70 feet. Metered on-street parking is generally available on both sides of the street within the Study Area. Existing access to the Project Site is provided along Beverly Boulevard at Genesee Avenue.

- West 1st Street is a designated Local Street that travels in the east-west direction and intersects Fairfax Avenue along the western boundary of the Project Site. It is an undivided two-way road with a total paved width of

approximately 30 feet. Permit parking is generally available on both sides of the street within the Study Area.

- West 3rd Street is a designated Avenue II that travels in the east-west direction and is located approximately 900 feet south of the Project Site. It provides four travel lanes, two in each direction, and left-turn lanes at most intersections. Travel lanes are typically 10 feet wide, and the total paved width varies from approximately 53 to 68 feet. Metered on-street parking is generally available on both sides of the street west of Fairfax Avenue, and unmetered on-street parking is generally available on the north side of the street east of The Grove Drive within the Study Area.

- Colgate Avenue is a designated Local Street that travels in the east-west direction and is located approximately 0.3 mile south of the Project Site. It is an undivided two-way road with a total paved width of approximately 34 feet. Unmetered on-street parking with permit parking exemptions west of Fairfax Avenue is generally available on both sides of the street within the Study Area.

Figure IV.K-1 and Figure IV.K-2 on pages IV.K-20 and IV.K-21 identify the roadway designations and modal priorities, respectively, of the streets within the Study Area based on the Mobility Plan. Fairfax Avenue and Beverly Boulevard adjacent to the Project Site and West 3rd Street within the Project Site vicinity 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), LADOT Downtown Area Shuttle (DASH), and LADOT Cityride. The following bus lines provide service within the Study Area:

- Metro Local 14: Route 14 is a local line that travels from downtown Los Angeles to Beverly Center via Beverly Boulevard, with an average headway of 15 minutes during the weekday morning and afternoon peak hours. Weekend service is also available, with longer headways. It provides service to Hancock Park and Fairfax Village. This line travels along Beverly Boulevard within the Project Site vicinity and stops at Fairfax Avenue and Genesee Avenue adjacent to the Project Site.

- Metro Local 16: Route 16 is a local line that travels from downtown Los Angeles to West Hollywood via 3rd Street, with an average headway of six minutes during the weekday morning and afternoon peak hours. Weekend service is also available, with longer headways. It provides service to Koreatown, Park La Brea, and Beverly Grove. This line travels along 3rd Street within the Project Site vicinity and stops at Fairfax Avenue near the Project Site.

Figure IV.K-1
Roadway Designations in Study Area

Source: Gibson Transportation Consulting, Inc., 2021.

Figure IV.K-2

Modal Priorities and High Injury Network in Study Area

Source: Gibson Transportation Consulting, Inc., 2022.

- Metro Local 217: Route 217 is a local line that travels from the Metro B Line Vermont/Sunset Station to the Metro E Line La Cienega/Jefferson Station via Hollywood Boulevard and Fairfax Avenue, with an average headway of 10 minutes during the weekday morning and afternoon peak hours. Weekend service is also available, with longer headways. It provides service to Los Feliz, Hollywood, and West Hollywood. This line travels along Fairfax Avenue within the Project Site vicinity and stops at Beverly Boulevard and West 1st Street adjacent to the Project Site.

- Metro Local 218: Route 218 is a local line that travels from Studio City to Cedars Sinai Medical Center via Laurel Canyon Boulevard and Fairfax Avenue, with an average headway of 60 minutes during the weekday morning and afternoon peak hours. Weekend service is also available, with longer headways. It provides service to Mount Olympus, West Hollywood, Park La Brea, and Beverly Hills. This line travels along Fairfax Avenue within the Project Site vicinity and stops at Beverly Boulevard and West 1st Street adjacent to the Project Site.

- LADOT DASH Bus Service FX Local: LADOT DASH FX is a local line that travels from Cedars Sinai Medical Center to Wilshire Boulevard, with an average headway of 30 minutes during the weekday morning and afternoon peak hours. Weekend service is also available, with longer headways. This line travels along Fairfax Avenue within the Project Site vicinity and stops at Beverly Boulevard and West 1st Street adjacent to the Project Site.

- LADOT Cityride Bus Service PLB Limited: LADOT Cityride PLB is a limited line that travels within the Park La Brea area. It provides service on Tuesdays and Thursdays only from 10:00 A.M. to 4:00 P.M. with an average headway of 20 minutes. This line travels along Fairfax Avenue and Beverly Boulevard within the Project Site vicinity and stops at West 1st Street on Fairfax Avenue and Genesee Avenue on Beverly Boulevard adjacent to the Project Site.[8]

There are multiple bus routes providing service between the Project Site and Union Station, the largest regional transit hub in Southern California located on Cesar E. Chavez Avenue at Alameda Avenue just beyond the limits of the Study Area. Many additional bus and rail lines connect to Union Station, providing one-transfer access to a large public transit network.

(2) Existing Parking and Site Access

Existing studio parking is provided in surface lots primarily located along the perimeter of the Project Site. The current parking supply is approximately 1,510 spaces.

[8] Cityride is a transportation assistance program for individuals 65 years of age or older and qualified persons with disabilities. It provides service from 10:00 A.M. to 4:00 P.M. with 20-minute intervals.

As illustrated in Figures II-7 and II-8 in Section II, Project Description, of this Draft EIR, access to the Project Site is provided at multiple points around the perimeter, including the following: (1) three driveways and one pedestrian gate along Beverly Boulevard;[9] (2) two driveways and one pedestrian gate along Fairfax Avenue; (3) a pedestrian gate along The Grove Drive; and (4) one pedestrian gate along the southern boundary of the Project Site. All vehicular and pedestrian entrances and exits include internal controlled access, and a series of drive aisles and sidewalks provide access throughout the Project Site.

(3) Existing Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

The sidewalks that serve as routes to the Project Site provide connectivity but do not meet Mobility Plan standards in all cases. Along the Project Site frontages, 10-foot-wide sidewalks/parkways are provided on Fairfax Avenue, 12- to 15-foot-wide sidewalks are provided on Beverly Boulevard, and 9-foot-wide sidewalks are provided on the west side of The Grove Drive. Sidewalks are not currently provided on the east side of The Grove Drive, but there are various pedestrian connections through Pan Pacific Park. All of the signalized intersections in the Project vicinity provide crosswalk striping, pedestrian push buttons and phasing, and ADA accessibility improvements, such as tactile warning strips and wheelchair ramps. Adjacent to the Project Site, continental crosswalks (i.e., high visibility crosswalks characterized by wide "zebra" striping patterns) are provided on all legs of the Fairfax Avenue and Beverly Boulevard intersection; all legs of Genesee Avenue and Beverly Boulevard; and on three legs of Stanley Avenue/The Grove Drive and Beverly Boulevard (there is no crosswalk on the east leg). Additionally, uncontrolled continental crosswalks are provided on the north and west legs of the Fairfax Avenue and West 1st Street intersection, and a signalized continental crosswalk is provided midblock on The Grove Drive, approximately 500 feet south of Beverly Boulevard.

(b) Bicycle Facilities

Based on the City's 2010 Bicycle Plan, the City's existing bicycle system consists of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle lanes (Class II) are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. Bicycle routes and bicycle-friendly streets are those where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes and bicycle-friendly streets are preferably located on collector and lower volume arterial streets. Bicycle routes with shared lane markings, or "sharrows," remind bicyclists to ride farther

[9] Two of the Beverly Boulevard driveways are existing curb cuts that are not currently used for access.

from parked cars to prevent collisions, make motorists aware of bicycles potentially in the travel lane, and show bicyclists the correct direction of travel. Within the Project vicinity, bicycle lanes (Class II) are provided along Hauser Boulevard between West 3rd Street and 6th Street.

(4) Existing Traffic Volumes

As discussed in the Transportation Assessment, intersection turning movement counts during the typical weekday morning (7:00 A.M. to 10:00 A.M.) and afternoon (3:00 P.M. to 6:00 P.M.) commuter peak periods were collected at most of the study intersections in September 2019. At the intersection of Fairfax Avenue and West 1st Street, the latest available traffic count data from February 2017 was obtained for use in the analysis.[10] An increase of one percent per year was applied to all study intersections to reflect assumed ambient traffic growth through Year 2021. The resulting intersection peak hour traffic volumes, representing Existing Conditions in Year 2021, are illustrated in Figure 13 of the Transportation Assessment.

c. Future Without Project Conditions

Buildout under the Specific Plan could take place in one phase over a 32-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 2043. However, the Transportation Assessment assumes the completion of Project construction in 2026, with a qualitative discussion of a long-range buildout scenario.

(1) Future Ambient Growth

As discussed in more detail in the Transportation Assessment, the analysis of future 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 by Year 2026. The total adjustment applied over the

[10] Due to the Safer at Home order in response to the COVID-19 pandemic, typical traffic patterns have been disrupted and LADOT is allowing the use of historical traffic count data with application of an adjustment factor.

five-year period was 5.10 percent. This growth factor also accounts for increases in traffic due to projects not yet proposed, as well as projects located outside of the Study Area.

(2) Related Projects

A list of related projects was prepared based on information provided by the Department of City Planning, LADOT, the Cities of West Hollywood and Beverly Hills, as well as recent studies of projects in the area. The related projects are listed in Table III-2 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.[11] 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 2026 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 in the five years prior to the anticipated 2026 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 Without Project 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 analysis. Other proposed traffic/trip reduction strategies, such as TDM programs for individual buildings and developments, were omitted from the analysis. Figure 17 in the Transportation Assessment illustrates the locations of the proposed transportation facility improvements, including any future transit, bicycle, and pedestrian facilities within 0.25 mile of the Project Site.[12] The following improvements were evaluated for their potential effects on the future roadway configurations and are included in the Future Without Project Conditions:

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[11] While the majority of the related projects under consideration are located within 0.5 mile of the Project Site, several more distant projects, including a few located in the Cities of Beverly Hills and West Hollywood, are included as well.

[12] While LADOT recommended in their Assessment Letter for the Transportation Assessment to improve the visibility of crosswalks (as reflected in the Transportation Assessment), all crosswalks adjacent to the

(Footnote continued on next page)

- Metro D (Purple) Line Extension: The planned Metro D (Purple) Line extension will provide seven additional stations from the existing Wilshire/Western Station to the planned Westwood/Veterans Administration Hospital Station. The line will operate underground, with the majority of the alignment along Wilshire Boulevard. The Metro D Line extension is expected to be completed by 2027, and the first section (which includes the Wilshire/La Brea Station, Wilshire/Fairfax Station, and Wilshire/La Cienega Station) is currently under construction and is anticipated to be completed by 2024. The Wilshire/Fairfax Station would be located approximately 0.8 mile south of the Project Site, with a station portal on the southeast corner of Orange Grove Avenue and Wilshire Boulevard. The Wilshire/Fairfax Station is expected to be operational prior to the anticipated completion year of the Project. However, to provide a conservative analysis, no additional trip reductions in existing or future vehicular traffic were assumed to account for patrons that would utilize the Metro D Line extension. In addition, no changes to the lane configurations at the study intersections are anticipated with the completion of the Metro D Line extension.

  As part of the first section of the Metro D Line extension, Metro is undertaking public surveys to understand and prioritize transportation facilities improvements as part of a first-mile/last-mile strategic plan. Although the plan has not been finalized, it is anticipated to include pedestrian and bicycle improvements within a 0.5-mile radius of each of the three new rail stations.[13] Pedestrian improvements may include bulb-outs, bus stop improvements, landscaping and shade, new or improved crosswalks and sidewalks, pedestrian and bicycle lighting, street furniture, traffic calming, and/or wayfinding signage. Bicycle improvements may include protected bicycle lanes, sharrows, bicycle friendly streets, and/or bicycle hubs. No changes to the lane configurations at the study intersections as a result of these potential improvements are assumed in this analysis.

- NextGen Bus Plan: Metro's NextGen Bus Plan project would restructure the current Metro bus routes and schedules into a new competitive bus system that would provide fast, frequent, reliable, and accessible service. The plan was approved by Metro in October 2020 and would be implemented with a three-phase roll-out through the end of 2021. As part of the NextGen Bus Plan, Metro proposes increases in frequency and potential route consolidation within the Study Area on Locals 14, 16, 17, and 217, Limited 316, and Rapid 780. These transit operational improvements would not affect the lane configurations at the study intersections. Additionally, LADOT and Metro are working together

Project Site have since been improved with continental crosswalks. The analysis below reflects current conditions.

13 Metro has proposed pedestrian and bicycle improvements for additional sections of the Metro D Line extension, which are detailed in "Purple Line Extension First/Last Mile Plan: Sections 2 & 3" (Metro, May 2020). It is anticipated that Metro will provide similar improvements for Section 1 of the Metro D Line extension.

to identify corridors for potential exclusive bus lanes and supporting signal improvements. Within the Study Area, La Brea Avenue is under consideration for bus-only lanes. No decisions have been finalized, and, thus, no changes to the physical configuration along La Brea Avenue are assumed in this analysis.

- Vision Zero: The City has various transportation improvements planned within the Study Area as part of Vision Zero. These include pedestrian improvements at Fuller Avenue and Beverly Boulevard and traffic signal improvements at Martel Avenue/Hauser Boulevard and West 3rd Street. The improvements at Fuller Avenue and Beverly Boulevard, which are funded, include the installation of a new rectangular rapid flash beacon (RRFB), ADA compliance ramps, and street lighting to replace an uncontrolled crosswalk. LADOT has indicated that similar improvements may be needed elsewhere within the Study Area to improve pedestrian accessibility and safety. Because these additional locations have not been identified or funded, no changes were assumed in this analysis. The improvement at Martel Avenue/Hauser Boulevard and West 3rd Street consists of the installation of protected left-turn phasing on the northbound and southbound approaches to allow vehicles to turn left without conflicting with pedestrians or other vehicles. This improvement is not currently funded, and, therefore, no changes at the intersection are assumed in this analysis.

- Active Transportation: The City's Active Transportation program is dedicated to supporting the "active" travel modes for everyone, including those who walk, bike, ride, or roll. It seeks to provide opportunities to connect neighborhoods and destinations, to make public transit more accessible, and to support Angelenos in using streets for more than driving, all while putting safety first. Improvements included as part of the Active Transportation program are bicycle signal detection and traffic signals, continental crosswalks, curb extensions and ramps, and neighborhood traffic circles. The local network of bicycle wayfinding and traffic calming measures facilitate bicycle travel and provide an alternative from high-stress roadways with high vehicular travel. No changes to the lane configurations at the study intersections as a result of these improvements are assumed in this analysis.

- Pedestrian Facilities Improvements: A new pedestrian crosswalk is proposed across The Grove Drive at the approximate location of the Southern Shared Access Drive. The new crosswalk will provide connection between the Holocaust Museum LA and Pan Pacific Park to the east and the Project Site and The Grove to the west. There is currently no pedestrian crossing at this location. The Project would not preclude the installation of this improvement. No changes to the lane configurations at the study intersections would result from this improvement.

- 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 specific

improvements that may be implemented in those networks have not yet been identified, and there is no schedule for implementation; therefore, no changes to the intersection lane configurations were made as a result of the Mobility Plan. However, as detailed below, the mobility-enhanced networks included corridors within the Project Site vicinity:

- Transit Enhanced Network (TEN): 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. Fairfax Avenue, Beverly Boulevard, and West 3rd Street have been designated as part of the TEN.

- Neighborhood Enhanced Network (NEN): 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 NEN designates Edinburgh Avenue, Ogden Drive between West 3rd Street and Colgate Avenue, The Grove Drive/Stanley Avenue north of Caruso Place, Rosewood Avenue, and West 1st Street west of Fairfax Avenue and east of Gardner Street as part of the network.

- Bicycle Enhanced Network (BEN)/Bicycle Lane Network (BLN): The BEN is intended to provide a low-stress network of Class I bicycle paths and Class IV protected bicycle lanes. There are no BEN facilities proposed within the Study Area. The BLN would consist of Class II striped bicycle lanes and Class III shared bicycle lanes (sharrows). Fairfax Avenue, Beverly Boulevard, The Grove Drive south of Caruso Place, and West 3rd Street have been designated for future bicycle lane or sharrow implementation in the BLN.

- Pedestrian Enhanced District (PED): 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. Crescent Heights Boulevard south of West 1st Street, Fairfax Avenue, Beverly Boulevard between Crescent Heights Boulevard and Spaulding Avenue, and West 3rd Street west of The Grove Drive are designated as part of the PED.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the TAG, the Project would have a significant impact related to transportation/traffic 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 California Natural Resources Agency finalized the updates to the 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. The analysis in this section and the Transportation Assessment, included as Appendix M of this Draft EIR, uses the latest version of the TAG updated by LADOT in 2020.

(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 plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below evaluates the Project's potential to conflict with the applicable plans, programs, ordinances, and policies previously discussed. In accordance with the TAG, a project that generally conforms with and does not obstruct the City's development policies and standards is considered to be consistent with applicable plans.

(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. As discussed above, the *CEQA Transportation Analysis Update* establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG in July 2019. Threshold T-2.1 (Causing Substantial VMT) of 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 6.0 and a daily work VMT per employee impact threshold of 7.6 for the Central APC area, in which the Project is located. Therefore, if the Project's average household VMT per capita is equal to or lower than 6.0 and the average work VMT per employee is equal to or lower than 7.6, 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.[14] 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.[15]

Other types of trips generated by the Project, including Non-Home-Based Other Production (i.e., trips to a non-residential destination originating from a non-residential use at the Project Site), Home-Based Other Attraction (i.e., trips to a non-workplace destination originating from a residential use), and Non-Home-Based Other Attraction (i.e., trips to a non-residential destination originating from a non-residential use), are not factored into the VMT per capita and VMT per employee thresholds, as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, those trips were factored into the calculation of total Project VMT for screening purposes when determining whether a VMT analysis for the Project would be required.

LADOT developed its VMT Calculator (Version 1.3; July 2020) 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 and are categorized as follows:

1. Suburban (Zone 1): Very low-density areas primarily centered around single-family homes and a 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.

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

[15] LADOT and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation*, February 2019.

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

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

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

(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 circuity 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. The TDF Model considers the traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the project's VMT.

(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. A summary of the population and employment assumptions for various land uses is provided in Table 1 of the City of Los Angeles VMT Calculator Documentation.

(f) TDM Strategies

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

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

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in *Quantifying Greenhouse Gas Mitigation Measures*.[16]

(4) Hazardous Geometric Design Features

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

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

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.

(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.

(6) Freeway Safety Analysis

Based on the City Freeway Guidance, 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 morning or afternoon 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).

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

(7) Project Trip Generation and Related Characteristics

As discussed in the Transportation Assessment, trip generation for certain proposed land uses, including sound stages, production support, and production office uses, was based on empirical studies of trip generation at other studios in Los Angeles, as standard publications, such as the Institute of Transportation Engineers (ITE) Trip Generation Manual, do not provide data for studio-related uses. The primary difference between production office and general office uses, for trip generation purposes, is that production office trips exhibit less concentrated peak hour demands, spreading across morning and afternoon peaks due to the nature of the work and the schedules of the employees. Therefore, the trips generated by production office during the standard commuter peak hours are fewer than those generated by a typical office building. Trips for the retail uses were estimated based on a conservative (i.e., worst-case from a trip generation perspective) mix of grocery store, restaurant, and coffee shop uses. Various adjustments were applied to the trip generation estimates in accordance with the TAG. Specifically, estimates for each land use were reduced by 15 percent to account for staff and visitors traveling to the Project Site via public transit rather than automobile due to the Project Site's proximity to numerous bus/transit options.

The trip generation rates used in the analysis and the resulting Project trip generation estimates are presented in Table 6 of the Transportation Assessment. As shown therein, the Project is projected to generate approximately 787 net new morning peak hour trips (584 inbound, 203 outbound) and 855 net new afternoon peak hour trips (250 inbound, 605 outbound). When accounting for the existing floor area on-site that would remain as part of the Project, the total driveway trip estimates include 1,197 morning peak hour trips (876 inbound, 321 outbound) and 1,276 afternoon peak hour trips (396 inbound, 880 outbound), as detailed in Table 7 of the Transportation Assessment.

With regard to trip distribution, the geographic distribution of Project trips depends on the location of residential centers from which Project employees and visitors would be drawn, characteristics of the street system serving the Project Site, the level of accessibility of the routes to and from the Project Site, existing intersection traffic volumes, and the location and configuration of the proposed driveways, as well as input from LADOT staff. Refer to Figures 19B and 20B of the Transportation Assessment for the intersection-level trip distribution patterns of the proposed uses. This information was then used to assign Project-generated traffic at the study intersections. Figure 21 of the Transportation Assessment illustrates the Project-only traffic volumes at the study intersections during typical weekday morning and afternoon peak hours, while Figure 22 therein illustrates the total trips at each Project Site driveway during typical weekday morning and afternoon peak hours.

c. Project Design Features

The Project would include the Project design features set forth below. The operational Project design features set forth in Project Design Feature TR-PDF-2 below are not included in their entirety in the VMT impact analysis calculations presented herein, as they are not required to reduce any significant transportation impacts resulting from the Project. However, a supplemental VMT analysis that includes the effects of the additional TDM measures in Project Design Feature PDF-2 is included in Appendix M of this Draft EIR.

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 Project 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 contact information to contact regarding 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 Fairfax Avenue, Beverly Boulevard, and The Grove Drive, 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, to the extent feasible.

- 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 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.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities and posting of the telephone number at the Project Site readily visible to any interested party during site preparation, grading, and construction.
- Obtaining the required permits for truck haul routes from the City prior to the issuance of any building permit for the Project.

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 current 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 Project 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:

- Educational Programs/On-Site Coordinator: A coordinator will reach out to employees directly to promote the benefits of TDM. The coordinator will provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities, rideshare/carpool/ vanpool programs, and parking incentives. Marketing activities,

including printed/posted materials and digitally distributed information, will ensure that employees and visitors at the Project Site are aware of the benefits of the TDM Program and all of the mobility options available on-site and in the surrounding area.

- Transportation Information Center/Kiosks via Mobility Hub: The Project will install a transportation information center at a Mobility Hub. 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 Hub, nearby transit stops, bicycle parking, and bikeshare facilities.
- Bicycle Parking and Amenities: In order to facilitate bicycle use, the Project will provide short-term and long-term bicycle parking spaces in accordance with the Los Angeles Municipal Code (LAMC), as well as valet service, showers, lockers, and bicycle service areas and repair stands within the Project Site. The Project will incorporate features for bicyclists, such as exclusive access points and secured bicycle parking facilities. The Project Applicant will also contribute toward the implementation of bicycle improvements within the Study Area in accordance with 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. 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 Fairfax Avenue, Beverly Boulevard, and The Grove Drive and maintain internal walkways throughout the Project Site. The Project Applicant will also contribute toward pedestrian facilities improvements as part of Vision Zero.
- Shuttle Service: The Applicant will either operate or fund an employee van or shuttle service between the proposed Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site. The shuttle will operate during typical commuter peak periods and provide service from or near the Project Site to the Metro D Line Wilshire/Fairfax Station. The shuttle service will enhance employee access to the Metro D Line and, therefore, result in greater reductions in vehicle trips and vehicle miles traveled (VMT). Additionally, the Mobility Hub could support future shuttle services to connect to existing and future transit stations (e.g., the Metro B Line or Crenshaw North Extension).

- 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 the existing crosswalks at the signalized intersections along Beverly Boulevard at Fairfax Avenue and Stanley Avenue/The Grove Drive to current LADOT standards with new continental crosswalks and black and white contrast markings.[17]
- 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 in the design and implementation of the Project and will provide support for such services at the Mobility Hub, as appropriate. Specifically, as required by LADOT, the Mobility Hub will include space to accommodate support uses, storage, maintenance, and staging facilities. These services will give employees and visitors a variety of travel mode choices and, therefore, encourage the use of non-automobile modes to and from the Project Site and reduce VMT.
- Carpool/Vanpool Parking and Loading via Mobility Hub: The Mobility Hub 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 on Fairfax Avenue, Beverly Boulevard, and the Southern Shared

[17] While LADOT recommended in their Assessment Letter for the Transportation Assessment to improve the visibility of crosswalks, all crosswalks adjacent to the Project Site have since been improved with continental crosswalks.

Access Drive for carpools, vanpools, shuttles, ride-share, taxi, and other commercial and non-commercial vehicles.

- 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 the 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.
- Transit Infrastructure Improvements: The Project will improve the existing transit infrastructure at bus stops located within the immediate vicinity of the Project Site along Fairfax Avenue and Beverly Boulevard. This will include, where applicable, upgrades to provide adequate benches, shelters, lighting, light-emitting diode (LED) displays, and signage.

Project Design Feature TR-PDF-3: The Project will include the following off-site Vision Zero safety improvements:[18]

- Where applicable, the Project will improve the existing pedestrian infrastructure at the bus stops located around the Project Site perimeter along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract.
- The Project Applicant will contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue.

Project Design Feature TR-PDF-4: The Project Applicant will contribute up to $1.34 million toward transportation systems management (TSM) improvements within the Project area that may be considered to better accommodate intersection operations and increase network capacity

[18] While LADOT recommended in their Assessment Letter for the Transportation Assessment to improve the visibility of crosswalks, all crosswalks adjacent to the Project Site have since been improved with continental crosswalks.

throughout the Study Area. LADOT's Automated Traffic Surveillance and Control (ATSAC) Section has identified the following improvements within the Project area along Fairfax Avenue, Beverly Boulevard, and The Grove Drive:

- Fairfax Avenue and Beverly Boulevard—Signal upgrades, 351 cabinet with new signal controller, system loop, flashing yellow arrow at Beverly Boulevard for the westbound left-turn.
- Fairfax Avenue and Oakwood Avenue—Northbound and southbound system loops.
- Fairfax Ave and 3rd Street—Signal upgrades, new cabinet, flashing yellow arrow for eastbound and westbound left turn.
- The Grove Drive and 3rd Street—New signal controller for leading pedestrian interval.
- The Grove Drive and Beverly Boulevard—Closed Circuit TV (CCTV) camera, new cabinet and signal controller for leading pedestrian interval.
- The Grove Drive Corridor—Signal communication including conduit, 25 pair interconnect, 24SM single mode fiber, pull boxes, and ground cables.
- Beverly Boulevard and Genesee Avenue—System loops for eastbound and westbound, and new cabinet and westbound left-turn phasing (if warranted).
- Beverly Boulevard and Gardner Street—System loops for eastbound and westbound.
- Beverly Boulevard and Curson Avenue—System loops for eastbound and westbound.

Project Design Feature TR-PDF-5: The Project will install left-turn signal phases at the following three key intersections: Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street.

(1) Relevant Project Characteristics

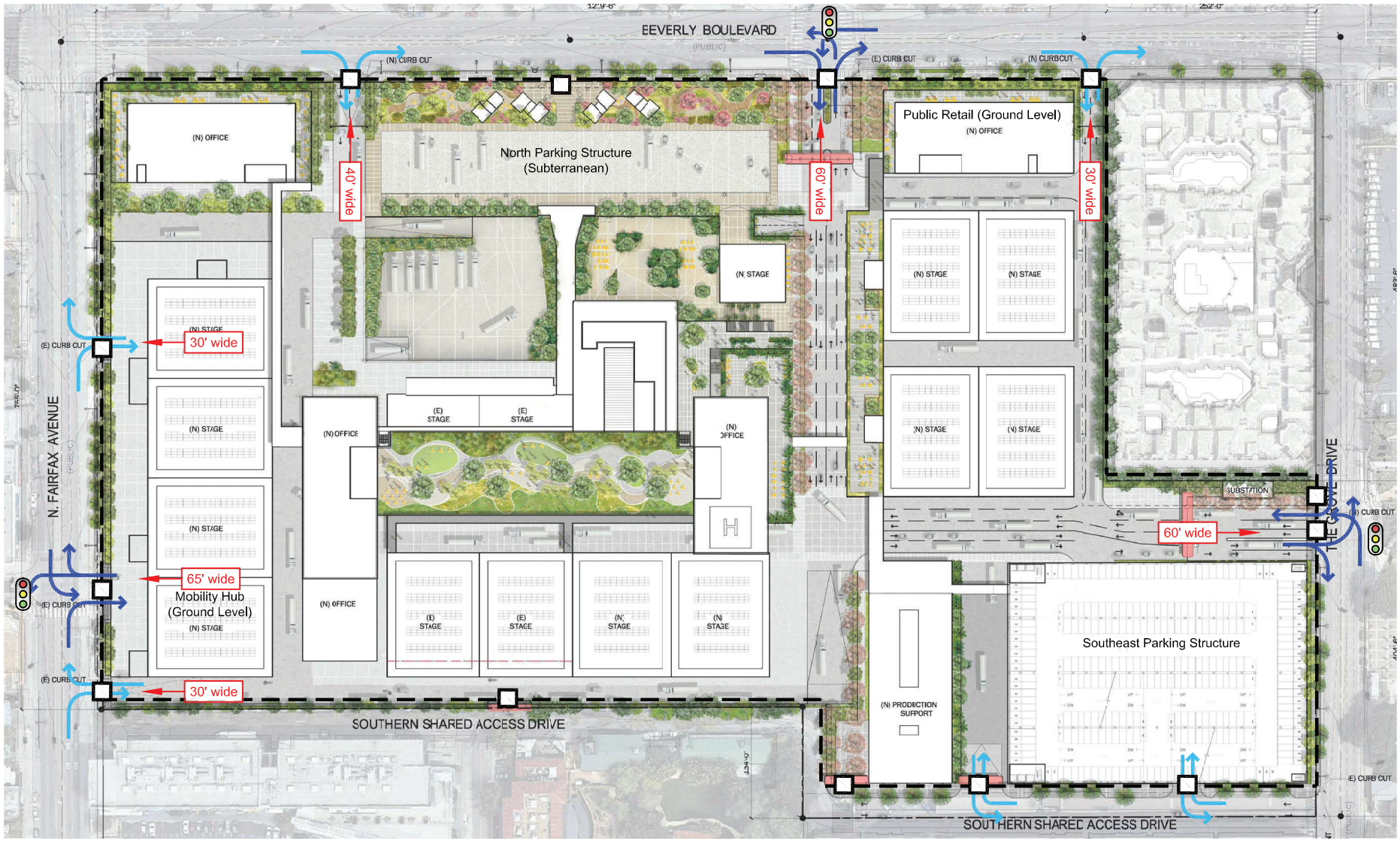
As described in Section II, Project Description, of this Draft EIR, the Project represents the continuation of an existing studio use and involves the modernization and expansion of Television City to meet the contemporary needs and changing demands of the entertainment industry, while rehabilitating and preserving the integrity of the historic resource on-site. Under the Specific Plan proposed as part of the Project, portions of the Project Site would be redeveloped with new studio-related uses, circulation improvements, parking facilities, landscaping, and open space. At full buildout, the Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of floor area within the Project

Site, for a sitewide Floor Area Ratio (FAR) of approximately 1.75:1. The Specific Plan would allow for the construction of up to 1,626,180 square feet of new sound stage, production support, production office, general office, and retail uses; the demolition of up to 495,860 square feet of existing uses; and the retention of up to 247,820 square feet of existing uses. As such, the Project would result in a total net increase of approximately 1,130,320 square feet of floor area upon full buildout. The specific mix of uses ultimately constructed would depend upon market demands, and the Specific Plan would allow flexibility in locating the various uses within the Project Site. The Specific Plan would also allow for the exchange of certain permitted land uses through a limited land use exchange procedure (discussed further below). Buildout under the Specific Plan could take place in one phase over a 32-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 2043.

As discussed further below and shown in Figure IV.K-3 on page IV.K-43, vehicular access would be provided via the nine vehicular access points: three driveways along Beverly Boulevard, including one entry/exit driveway and two right-in/right-out driveways; three driveways along Fairfax Avenue, including one entry/exit driveway and two right-in/ right-out driveways; one entry/exit driveway on The Grove Drive; and two right-in/left-out entry/exit driveways along the Southern Shared Access Drive, accessed from The Grove Drive. Any new driveways would be designed in accordance with the standards set forth in the LADOT Manual of Policies and Procedures and subject to the approval of LADOT and the Los Angeles Bureau of Engineering.

The Project would incorporate a multi-level circulation plan that provides flexible and efficient access from all Project Site driveways and efficient circulation to meet the demands of a large-scale production studio. Two primary production levels would provide access, staging, storage, and connectivity between active production and supporting uses. The main level (at Project Grade), or the production activity level, would provide direct and separate access for vehicles and pedestrians to the uses on-site via a unified ground plane encircling the production facilities. The lower level, or the production operations level, would provide large areas of flexible space to house production vehicles and store equipment, with direct access to the production activity level above via vehicle ramps, pedestrian stairs and elevators, and service elevators.[19] To facilitate efficient, safe, and effective production circulation, both the production activity and the production operations levels would provide space for basecamp, production staging, loading, and emergency

[19] Basecamps are flexible production staging areas where mobile facilities, such as trucks, generators, and support vehicles related to production, are temporarily staged. Within the Project Site, basecamp activities typically occur within surface parking areas and other open space areas.



LEGEND

Primary Vehicular Access

Secondary Vehicular Access

XX' Approximate Driveway Width

Security Entry Point & Boundary

N
Not to Scale

Figure IV.K-3
Vehicular Project Site Access

Source: Gibson Transportation Consulting, Inc., 2021.

vehicle access throughout the Project Site. These levels would be interconnected via a series of vehicular and pedestrian ramps, stairs, and elevators.

The Specific Plan would establish parking requirements for each of the main land use categories (sound stages, production support, production office, general office, and retail uses), ranging from one to three parking spaces per 1,000 square feet of floor area, for a sitewide total of approximately 5,300 parking spaces. Specifically, for every 1,000 square feet of floor area: two parking spaces would be required for retail uses, production support uses, and all other uses permitted under the Specific Plan (excluding sound stages, production office, and general office uses); 2.5 parking spaces would be required for sound stage uses; and three parking spaces would be required for production office and general office uses. Childcare, security stations, basecamp, and non-occupiable structures, such as sets/façades, kiosks, infrastructure-related facilities, and parking/entry facilities, would not require dedicated parking. Vehicles may be parked in tandem (double or triple) or by valet, depending on the specific parking layout. In addition, the Specific Plan sets forth a process for the approval and implementation of a reduced/shared parking plan, as long as an adequate parking supply is maintained. While the conceptual site plan provided in Figure II-4 in Section II, Project Description, of this Draft EIR, illustrates specific parking locations, ultimately, parking may be located anywhere within the Project Site or off-site upon submittal of an off-site parking agreement or covenant satisfactory to the Director of the Department of City Planning. Accordingly, parking may be provided in a combination of above-ground structures, subterranean structures, and/or surface spaces and may be designed to accommodate semi-automated or fully automated parking operations. Additionally, on-site parking for production vehicles would be provided adjacent to the proposed sound stages and in other large areas to accommodate basecamp activities. Furthermore, temporary off-site parking due to any displacement resulting from production filming and related activities may be provided, with shuttle service to the Project Site as needed. Lastly, existing uses and facilities may be maintained without changes in their respective existing parking requirements.

As part of the TDM Program set forth in Project Design Feature TR-PDF-2 and as depicted in Figure II-9 in Section II, Project Description, of this Draft EIR, a Mobility Hub would be located on-site to support first-mile/last-mile connections; encourage employee and visitor use of public transit, carpooling, vanpooling, and biking/scootering to work; and to support other TDM strategies. First/last mile services would include personal transportation options such as motorized and non-motorized scooters, skateboards, and bicycles, both personally owned and as short-term rentals (e.g., bike share services). The Mobility Hub would also provide an off-street space for employees and visitors to access passenger pick-up/drop-off zones, carpools, vanpools, shuttles, ride-share, taxis, and other commercial and non-commercial vehicles, and the temporary parking of buses. In particular, the Mobility Hub would support shuttle service between the planned Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site, as well as future shuttle services

connecting to other existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension). Additionally, the Mobility Hub would include space to accommodate support uses, storage, maintenance, staging facilities, bike share, security, guest/hospitality services, and ridership amenities. Such amenities would include a transportation information center providing real-time transit information via digital bulletin boards, wayfinding information for nearby transit stops, and bicycle-related services such as valet service, repair stands, showers, and lockers. Additional services to be provided at the Mobility Hub are detailed in the proposed TDM Program set forth in Project Design Feature TR-PDF-2.

Pedestrian access to the Project Site is illustrated in Figure II-8 in Section II, Project Description, of this Draft EIR. As shown therein, pedestrian access would be provided from Beverly Boulevard, Fairfax Avenue, The Grove Drive, and the southern property line. All access points would be controlled with gates and/or staffed guard houses. A gate marking the main pedestrian entrance to the Project Site would be located along Beverly Boulevard near the center of the Project Site. Internal paths would be utilized throughout the Project Site to facilitate efficient circulation and access to all buildings and parking areas from the various Project driveways, and pedestrian bridges may be used to connect production areas within the buildings. Additionally, ride-share pick-up/drop-off zones could be located along Beverly Boulevard, Fairfax Avenue, and/or the Southern Shared Access Drive, as well as in the Mobility Hub. As discussed further below and illustrated in Figure IV.H-3 through Figure IV.H-6 in Section IV.H, Land Use and Planning, of this Draft EIR, sidewalks would be widened in certain locations along the Project Site perimeter to allow for greater separation between pedestrians and vehicles, and streetscaping and other amenities would be incorporated to enhance the pedestrian experience.

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; Wilshire Community Plan; Plan for a Healthy Los Angeles; LAMC; Vison Zero; and the 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 consistency with the applicable policies in the Mobility Plan is provided in Table IV.K-1 on page IV.K-47. In summary, the Project is conceived as a pedestrian- and transit-oriented development that emphasizes accessibility by all travel modes. The Project's conceptual Mobility Hub, preliminarily located along Fairfax Avenue in the southwest corner of the Project Site, 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. Furthermore, the Project would provide dedicated curbside passenger loading areas at the Mobility Hub and along the Project Site perimeter, along the Project Site frontages on Fairfax Avenue and Beverly Boulevard, and along the Southern Shared Access Drive. The Project would also widen portions of the existing sidewalks around the Project Site perimeter consistent with the Mobility Plan goals and, to the extent feasible under the City's current bus shelter contract, improve the existing bus stops along Fairfax Avenue and Beverly Boulevard with adequate benches, shelters, lighting, LED displays, and signage. Additionally, the Applicant would contribute toward the implementation of bicycle improvements and pedestrian facilities improvements in the Study Area, including funding for a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. The Project would also implement traffic signal improvements and traffic calming measures in the Project Site vicinity, including the installation of left-turn signal phasing at the following three key intersections per Project Design Feature TR-PDF-5 and in coordination with LADOT: Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street.

With regard to parking, the Project would provide sufficient on-site parking to meet the needs of employees and visitors at the Project Site. As previously described, the Specific Plan would establish vehicular parking requirements for each of the land use categories ranging from one to three parking spaces per 1,000 square feet of floor area. A limited area of existing on-street metered parking along Beverly Boulevard east of Genesee Avenue would be converted to a commercial loading zone to support the uses along Beverly Boulevard.

In combination with the numerous transportation services to be provided at the Project's Mobility Hub, the Project's location approximately 0.8 mile north of the future Metro D (Purple) Line Wilshire/Fairfax Station, which is anticipated to be operational by 2024, would encourage the use of alternative mobility modes. Additionally, the Project's TDM Program would further reduce vehicle trips. The Project is estimated to generate

Table IV.K-1
Project Consistency With the Mobility Plan 2035

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
Chapter 1: Safety First	
Policy 1.1 Roadway User Vulnerability: Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.	**No Conflict.** The most vulnerable roadway user is typically a pedestrian, and the Project would include several improvements that prioritize pedestrian safety and the pedestrian experience, including landscaping, sidewalk improvements, and bus stop improvements around the Project Site perimeter. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. Dedicated pedestrian entries to the Project Site would be provided along the Project Site perimeter, as illustrated in Figure II-8 in Section II, Project Description, of this Draft EIR. The Project would include an on-site (off-street) Mobility Hub with pedestrian access to support multi-modal mobility options, including first-mile/last-mile connections and other TDM strategies. The Applicant would also contribute toward pedestrian facility improvements within the Study Area as part of Vision Zero, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. All improvements within the public right-of-way would be designed and completed in consultation LADOT or other agencies, as applicable, and in compliance with applicable City regulatory standards.
Policy 1.2 Complete Streets: Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.	**No Conflict.** The Project would comply with all applicable design element requirements, which may affect public rights-of-way, including proper driveway alignment, sidewalk widths, improved lighting elements, and landscape design, to promote safety, mobility, and accessibility. The Project's sidewalk and crosswalk improvements would facilitate pedestrian and bicycle accessibility and improve the safety and mobility of all users. The Project Applicant would also contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue.
Policy 1.3 Safe Routes to Schools: Prioritize the safety of school children on all streets regardless of highway classifications.	**No Conflict.** Hancock Park Elementary School is located approximately 0.3 mile south of the Project Site along Fairfax Avenue. The Safe Routes to School program for Hancock Park Elementary School identifies most of the striped crosswalks south of Beverly Boulevard within the Project Site vicinity as "recommended crossing" locations, including across Fairfax Avenue at 1st Street. The Project Applicant would install a new traffic signal at that location, thus improving pedestrian safety compared to the current uncontrolled crosswalks and prioritizing the safety of school children. Additionally, Ohel Chana High School and Morasha Hebrew Academy are located less than 100 feet and less than 800 feet, respectively, to the northeast of the Project Site

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
	along Beverly Boulevard. Continental crosswalks are currently provided across Beverly Boulevard at the adjacent and nearby signalized intersections at Fairfax Avenue, Genesee Avenue, The Grove Drive/Stanley Avenue, and Curson Avenue. As previously discussed, Project Design Feature TR-PDF-2 includes improvements to the existing crosswalks at Fairfax Avenue and Stanley Avenue/The Grove Drive to current LADOT standards with new continental crosswalks and black and white contrast markings. Additionally, the Project Applicant would contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue.
Policy 1.6 Multi-Modal Detour Facilities: Design detour facilities to provide safe passage for all modes of travel.	**No Conflict.** The Project includes a Construction Traffic Management Plan set forth in Project Design Feature TR-PDF-1 that would identify detour routes to provide safe passage for all applicable travel modes, including pedestrian and transit users.
Chapter 2: World Class Infrastructure	
Policy 2.3 Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** Fairfax Avenue and Beverly Boulevard along the Project Site perimeter are designated as part of a PED. The Project would improve pedestrian access and mobility and provide pedestrian-friendly areas along all street 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 upgrade the crosswalks and bus stops around the Project Site perimeter and provide designated pedestrian entrances to the Project Site. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. Moreover, the Project would include safe, delineated pathways for pedestrians throughout the Project Site. The Applicant would also contribute toward pedestrian facility improvements within the Study Area as part of Vision Zero, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. Thus, the Project would provide high-quality pedestrian access to provide a safe and comfortable walking environment.
Policy 2.4 Neighborhood Enhanced Network: Provide a slow speed network of locally serving streets.	**No Conflict.** The Grove Drive adjacent to the Project Site and 1st Street west of Fairfax Avenue are part of the NEN. Both roadways would provide direct access to the Project Site. The Project Site frontages would be lined with street trees as visual cues for the neighborhood character of the streets. Additionally, per Project Design Feature TR-PDF-5, the Project Applicant would contribute toward traffic signal

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
	upgrades consisting of the installation of left-turn signal phasing at the following three key intersections in coordination with LADOT: Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street. Furthermore, the Project's new signalized driveways and pedestrian crossings would facilitate vehicular traffic to and from the Project Site and minimize vehicular conflicts with other vehicles, pedestrians, and bicyclists. In addition, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding residential streets, thus supporting this policy to provide a slow speed network of locally serving streets.
Policy 2.5 Transit Network: Improve the performance and reliability of existing and future bus service.	**No Conflict.** While this policy is primarily directed at transit agencies, the Project would not conflict with or preclude any action to improve the performance and reliability of bus service. Adjacent to the Project Site, Fairfax Avenue and Beverly Boulevard are part of the TEN. The Project Site would continue to be accessible from both roadways. The Project would not preclude future improvements to existing and future transit services or operations and would not conflict with plans under development by Metro, such as the planned Metro D Line (Purple) extension, and/or LADOT. The Project proposes an employee shuttle service between the future Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site. Additionally, a Mobility Hub would support transit use through a transportation information center and first-mile/last-mile connections for transit, as well as future shuttle services to provide a connection to existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension).
Policy 2.6 Bicycle Networks: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities (includes scooters, skateboards, rollerblades, etc.).	**No Conflict.** Adjacent to the Project Site, Fairfax Avenue and Beverly Boulevard have been identified as part of the BLN. The Project would provide on-site short-term and long-term bicycle parking and related services, such as valet service, repair stands, showers, and lockers, to encourage bicycling for employees and visitors to the Project Site. A Mobility Hub would also provide space for bike-share facilities and other similar services that may be available in the future. Furthermore, the Project would contribute toward the implementation of bicycle improvements within the Study Area in accordance with the Mobility Plan. The Applicant would support City efforts to install bicycle lanes adjacent to the Project Site. Accordingly, the Project would contribute to the provision of safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.
Policy 2.9 Multiple Networks: Consider the role of each mode enhanced network	**No Conflict.** While this policy is primarily directed at the City, the Project would not conflict with or preclude

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
when designing a street that included multiple modes.	implementation of a street design that includes multiple modes. As detailed in Policies 2.3 to 2.6 and illustrated in Figure IV.K-2, the Project vicinity includes a mix of enhanced networks identified in the Mobility Plan. As previously discussed, the Project would improve the overall pedestrian experience surrounding the Project Site and would not conflict with the City's bicycle plans identified in the Mobility Plan.
Policy 2.10 Loading Areas: Facilitate the provision of adequate on and off-street loading areas.	**No Conflict.** The Project would provide on-site loading facilities for passengers, commercial vehicles, and studio production-related trucks. The Mobility Hub would be the primary location for passenger loading, with secondary dedicated space potentially along the Southern Shared Access Drive, Fairfax Avenue, and Beverly Boulevard. The Project would provide private service areas, loading docks, and internal roadways for all other loading activities within the Project Site. Accordingly, the Project would provide adequate on- and off-street loading areas. No commercial loading operations would occur within the public right-of-way.
Policy 2.17 Street Widenings: 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.	**No Conflict.** The Project Applicant proposes a 2-foot roadway widening on The Grove Drive to provide a dedicated northbound left-turn lane into the Project driveway. The Project Applicant is requesting a waiver of dedication in this area but would provide a 3-foot public sidewalk easement to widen the sidewalk by one foot overall in order to comply with Mobility Plan standards. The proposed dedications and waiver request would be reviewed by City staff as part of the Project's entitlements. The Project would also provide a public sidewalk easement on Fairfax Avenue and would maintain the existing right-of-way and sidewalk widths on Beverly Boulevard consistent with Mobility Plan standards. The Project would be consistent with the intent of the Mobility Plan with approval of the requested waiver. Thus, as addressed herein and in the Transportation Assessment, careful consideration has been given to the implications (including costs, character, safety, travel, infrastructure, and environment) of all proposed street widenings, including when the resulting roadway would be less than the standard dimension.
Chapter 3: Access for All Angelenos	
Policy 3.1 Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	**No Conflict.** The Project would support initiatives to create transit-oriented development by expanding employment opportunities and promoting the jobs/housing balance in a dense urbanized area well served by transit. As previously discussed, the Project would provide facilities for all travel modes through the development of the Mobility Hub, on-site bicycle parking and related amenities, and upgraded sidewalks and frontage areas along the Project Site perimeter, thereby recognizing all modes of travel as integral components of the City's transportation system. The Mobility

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
	Hub would provide opportunities for first-mile/last-mile connections, encourage employee and visitor use of public transit, carpooling, vanpooling, and biking/scootering to work, 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 to the planned Metro D (Purple) Line Wilshire/Fairfax Station, ride-share matching and carpool/vanpool programs, first-mile/last-mile options, and a Guaranteed Ride Home Program.
Policy 3.2 People with Disabilities: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** The Project's design would be consistent with ADA requirements and, therefore, support this policy to accommodate the needs of people with disabilities, with direct connections to pedestrian amenities at adjacent and nearby intersections. The Project would also improve the surrounding pedestrian environment by widening certain sidewalks, installing new landscaping and two new traffic signals, as well as upgrading the existing bus stops along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. In addition, the Project Applicant would contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue.
Policy 3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No Conflict.** The Project would provide multi-modal transportation solutions, including a Mobility Hub, to connect with surrounding public transit lines, encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit, thereby supporting this policy to reduce vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services. The Project would expand employment opportunities in proximity to residential areas, destinations, and local-serving retail and restaurants in an urbanized area. The surrounding mix of land uses would offer convenient non-commute opportunities for Project employees and visitors to help to minimize vehicle trips. The Project would support initiatives to create pedestrian- and transit-oriented development as it would redevelop an infill site located near multiple transit services. The Project also would encourage ride-sharing and the use of alternative mobility modes via its Mobility Hub. Additionally, the Project would implement a TDM Program to further reduce the number of single occupancy vehicle trips to the Project Site.
Policy 3.4 Transit Services: Provide all residents, workers, and visitors with affordable, efficient, convenient, and	**No Conflict.** The bus stops adjacent to the Project Site are serviced by several local and rapid bus lines and would be upgraded along Fairfax Avenue and Beverly Boulevard to

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
attractive transit services.	include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. The Project's Mobility Hub would act as a central location 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 additional landscaping, sidewalk, and crosswalk improvements along the Project Site perimeter. The Project's location approximately 0.8 mile north of the future Metro D (Purple) Line Wilshire/Fairfax Station, which is anticipated to be operational by 2024, would encourage the use of alternative mobility modes. Additionally, the Project would include an employee shuttle service between the future Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site. The Mobility Hub would also support future shuttle services to provide a connection to existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension). Thus, the Project would support this policy to provide all residents, workers, and visitors with efficient, convenient, and attractive transit services.
Policy 3.5 Multi-Modal Features: Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	**No Conflict.** The Project's Mobility Hub 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, thereby maximizing multi-modal connectivity and access for transit riders. In combination with the numerous transportation services to be provided at a Mobility Hub, the Project's location 0.8 mile north of the future Metro D (Purple) Line Wilshire/Fairfax Station , which is anticipated to be operational by 2024, would encourage the use of alternative mobility modes. In addition, the Project would improve the existing transit infrastructure at bus stops located within the immediate vicinity of the Project Site along Fairfax Avenue and Beverly Boulevard, which would include, where applicable, upgrades to provide adequate benches, shelters, lighting, LED displays, and signage. The Project's 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 service to the planned Metro D (Purple) Line Wilshire/Fairfax Station, ride-share matching and carpool/vanpool programs, first-mile/last-mile options, and a Guaranteed Ride Home Program.
Policy 3.7 Regional Transit Connections: Improve transit access and service to major	**No Conflict.** The Project would improve access between transit and major regional destinations by expanding

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
regional destinations, job centers, and inter-modal facilities.	employment opportunities and promoting the jobs/housing balance in an urbanized area near multiple transit services. The Mobility Hub would provide space to accommodate first-mile/last-mile connections, such as bike-share, bicycle rentals, and other similar services, thus making the use of existing and future transit services more convenient. Additionally, the Project proposes an employee shuttle service between the planned Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site. The Mobility Hub would also support future shuttle services to provide a connection to existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension).
Policy 3.8 Bicycle Parking: Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	**No Conflict.** The Project would provide convenient, secure, and well-maintained long-term and short-term bicycle parking facilities to encourage bicycling for employees and visitors to the Project Site. The Mobility Hub would also provide bike-share facilities or similar first-mile/last-mile transportation alternatives and bicycle amenities, such as valet service, repair stands, showers, and lockers.
Chapter 4: Collaboration, Communication, & Informed Choices	
Policy 4.1 New Technologies: Support new technology systems and infrastructure to expand access to transportation choices.	**No Conflict.** As described in Project Design Feature TR-PDF-2, the Project would support the latest improvements in first-mile/last-mile transportation solutions within the Mobility Hub, 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 choices.
Policy 4.2 Dynamic Transportation Information: Support a comprehensive, integrated transportation database and digital platform that manages existing assets and dynamically updates users with new information.	**No Conflict.** As part of the Project, the Mobility Hub would support a comprehensive, integrated transportation database and digital platform by providing digital bulletin boards that display real-time information regarding arriving buses and shuttle services to update riders with new information.
Policy 4.8 Transportation Demand Management Strategies: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** As described in Project Design Feature TR-PDF-2 and discussed throughout this analysis, the Project would utilize the following TDM strategies to reduce dependence on single-occupancy vehicles: • 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 • Local Transit Infrastructure Improvements

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
	• Shuttle Service • Neighborhood Enhancements
Policy 4.13 Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** The Project would provide sufficient parking to meet the needs of employees and visitors at the Project Site. The Specific Plan would establish vehicular parking requirements for each of the land use categories ranging from one to three parking spaces per 1,000 square feet of floor area. Parking may be provided in a combination of above-ground structures, subterranean structures, and/or surface spaces and may be designed to accommodate semi-automated or fully automated parking operations. Additionally, on-site parking for production vehicles would be provided adjacent to the proposed sound stages and in other large areas to accommodate basecamp activities. Furthermore, the Project would include a Mobility Hub, which would provide space to accommodate first-mile/last-mile connections, such as bike-share, bicycle rentals, and other similar services, thus making the use of existing and future transit services more convenient. By reducing the need for on- and off-street parking, the Project would support this policy of balancing the parking supply with other transportation and land use objectives.
Policy 4.14 Wayfinding: Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms.	**No Conflict.** The Project's TDM Program would provide user-friendly information about mobility options and local destinations, delivered through a variety of channels, including marketing activities, such as 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 also provide pedestrian wayfinding information displayed along pedestrian paths to direct pedestrians to the Mobility Hub, nearby transit stops, bicycle parking and bike-share facilities.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.1 Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health.	**No Conflict.** The Project would encourage sustainable transportation through the services provided at the Mobility Hub, such as transit information, bike-share rentals and other first-mile/last-mile solutions. The Project would provide pedestrian-friendly areas along Fairfax Avenue, Beverly Boulevard, and The Grove Drive, including sidewalk widening in certain areas and the installation of new street trees and landscaping along all public Project Site frontages. The Project would upgrade the crosswalks and bus stops around the Project Site perimeter, as needed, and would signalize the currently uncontrolled crosswalk across Fairfax Avenue at 1st Street. Bus stops along Fairfax Avenue and Beverly Boulevard would be upgraded to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. Furthermore, the Project Applicant would

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

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
	contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. The Project would also provide secure on-site bicycle parking facilities and amenities and dedicated pedestrian entries, all of which would support active transportation modes, such as biking and walking, to promote environmental and public health. Additionally, a number of bus lines provide transit service throughout the Project Site area, with bus stops located adjacent to the Project Site on both Beverly Boulevard and Fairfax Avenue, as well as within a 0.25-mile radius, thus providing employees and visitors with numerous public transportation alternatives.
Policy 5.2 Vehicle Miles Traveled (VMT): Support ways to reduce vehicle miles traveled (VMT) per capita.	**No Conflict.** The Project is estimated to generate lower work VMT per employee than the average for the Central APC area. The Project would further reduce VMT per capita through the implementation of the TDM Program measures described in Project Design Feature TR-PDF-2.
Policy 5.4 Clean Fuels and Vehicles: Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.	**No Conflict.** The Project would encourage the use of alternative fuels, new mobility technologies, and supporting infrastructure by providing electric vehicle (EV) charging stations and additional parking spaces capable of supporting future EV supply equipment in accordance with LAMC requirements.

[a] *Project consistency with additional applicable policies is discussed in Section IV.H, Land Use and Planning, of this Draft EIR and detailed in Table 1 of Appendix I of this Draft EIR.*

Source: Gibson Transportation Consulting, Inc., 2021.

lower VMT per capita for employees than the average for the area, as demonstrated in the analysis further below.

The preceding discussion highlights the Project characteristics that support specific policies in the Mobility Plan, as detailed in Table IV.K-1 beginning on page IV.K-47. Additionally, the Project would not hinder other goals and policies identified in the Mobility Plan. A discussion of specific Mobility Plan roadway standards and related Project improvements in the public realm, as illustrated in Figure IV.H-3 through Figure IV.H-6 in Section IV.H, Land Use, of this Draft EIR, is provided below.

Currently, the public sidewalks around the Project Site perimeter range from nine to 15 feet wide, and the areas accessible to pedestrians are as narrow as 3 to 4 feet along

portions of The Grove Drive and Fairfax Avenue. Further, the existing sidewalk widths along The Grove Drive and Fairfax Avenue do not meet current Mobility Plan standards.

Beverly Boulevard, which is designated as a Modified Avenue I in the Mobility Plan, requires a 35-foot half-width roadway within a 50-foot half-width right-of-way. The Project would maintain the existing variable 12- to 15-foot sidewalk area, in accordance with the Mobility Plan.[20] The sidewalk would include parkways extending approximately 4 feet from the back of the curb to provide planting areas for street trees, shrubs, and groundcover. Beyond the sidewalk, a variable 5- to 8-foot-wide frontage area would extend into the Project Site and provide a transition between the sidewalk and any buildings along Beverly Boulevard. Along Beverly Boulevard near the center of the Project Site, a gate would mark the central pedestrian entrance to the Project Site and provide views of the Primary Studio Complex.

Fairfax Avenue is designated as an Avenue II, which requires a 28-foot half-width roadway within a 43-foot half-width right-of-way. The Project would provide a 12-foot public sidewalk easement in addition to the 3-foot public right-of-way to complete an overall 15-foot sidewalk area to accommodate pedestrian travel. The sidewalk would include parkways extending approximately 4 feet from the back of the curb to provide planting areas for street trees, shrubs, and groundcover. Beyond the 12-foot sidewalk, 5 feet would be provided to create a 17-foot-wide frontage area along the Project Site perimeter, thus allowing for a transition between the sidewalk and any buildings along Fairfax Avenue. Along Fairfax Avenue, landscaping, berms, and other visual screening would be introduced to conceal partially-subterranean parking and portions of the Mobility Hub.

The Grove Drive is designated as a Collector Street in the Mobility Plan, which requires a 20-foot half-width roadway within a 33-foot half-width right-of-way (currently only 30 feet). The Project would widen the roadway on The Grove Drive by 2 feet in order to provide a dedicated left-turn lane into the Project Site, and the Project Applicant would request a waiver of dedication for the additional width. The proposed improvements would include signal upgrades, striping, and physical modification, and the existing driveway width requirements would be maintained. The Project would also include a 3-foot-wide public sidewalk easement in addition to the 7-foot public right-of-way to provide a 10-foot sidewalk. Although this would remain narrower than the 13-foot standard in the Mobility Plan, it would exceed the existing sidewalk width of 9 feet. The sidewalk would include

[20] Specifically, the sidewalk width meets the standard of 15 feet adjacent to the Project Site; however, toward Fairfax Avenue where the roadway widens up to three feet to accommodate the westbound left-turn lane to Fairfax Avenue, the sidewalk is reduced to approximately 12 feet. In consultation with the Los Angeles Bureau of Engineering, the existing configuration is considered generally compliant with the Mobility Plan, and no dedication or widening is required.

parkways extending approximately 4 feet from the back of the curb to provide planting areas for street trees, shrubs, and groundcover. Adjacent to the 3-foot sidewalk easement, an additional 4 feet would be provided to create a transition between the sidewalk and the parking structure along The Grove Drive, thus creating a 7-foot frontage area along this Project Site edge. Landscaping within this frontage area and the street parkways would incorporate existing street tree and plant selections along The Grove Drive and include species to complement those at Pan Pacific Park and the Holocaust Museum LA to the east. Thus, the Project would be consistent with the intent of the Mobility Plan.

Finally, along portions of the southern property line, sidewalks, screening, and/or planting areas would be introduced. In particular, along the Southern Shared Access Drive, a 10-foot-wide sidewalk would be provided in addition to the 8-foot right-of-way, where service loading areas would be located. Parkways would also be provided to allow for street tree plantings.

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

(b) Wilshire Community Plan

A detailed analysis of the Project's consistency with the transportation-related policies set forth in the Community Plan is provided in Table IV.K-2 on page IV.K-58. Project consistency with additional applicable Community Plan goals, objectives, and policies is discussed in Section IV.H, Land Use and Planning, of this Draft EIR and detailed in Table 2 of Appendix I of this Draft EIR. The Project would support many of the City's policies to maintain the community's distinctive character, including promotion of multimodal transportation (e.g., walking, bicycling, driving, and taking public transit); improvements to Project Site access and circulation along a central commercial corridor; and the creation of a mobility-friendly environment through pedestrian-oriented building design and landscaping and the introduction of a Mobility Hub. The Project would allow the continuation and expansion of the existing studio production-related uses at the Project Site, as well as provide up to 20,000 square feet of retail uses, including restaurant/ commissary uses. The Project would improve mobility for pedestrians and encourage the use of alternative transportation modes through broader sidewalks and pedestrian-friendly areas along the Project Site frontages, improved pedestrian crossings at signalized driveways, on-site bicycle amenities, and the on-site Mobility Hub. The Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones, carpools, vanpools, shuttles, ride-share, taxis, and other commercial and non-commercial vehicles, and the temporary parking of buses. The Mobility Hub would also include a transportation information center/kiosks and space to accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities. The Mobility Hub would support first-mile/last-mile connections; encourage employee and visitor use of public transit, carpooling, vanpooling, and biking/

Table IV.K-2
Project Consistency With the Wilshire Community Plan[a]

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
Objective 10-1: Continue to encourage improved and additional local and express bus service and neighborhood shuttles throughout the Wilshire Community Plan Area. **Policy 10-1.1:** Continue to coordinate with the Metropolitan Transportation Authority (MTA) and the Los Angeles Department of Transportation (LADOT) with plans to improve local and express bus service serving Wilshire.	**No Conflict.** The Project would coordinate with the appropriate agencies regarding any improvements to local transit services in the area. Additionally, the Project would improve transit accessibility and safety through improvements to bus stops along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. Further, the Project Applicant will either operate or fund an employee van or shuttle service between the proposed Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site.
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.** The Project would provide more pedestrian friendly areas along Fairfax Avenue, Beverly Boulevard, and The Grove Drive and install new landscaping along the public Project Site frontages. Specifically, the Project would upgrade crosswalks and bus stops around the Project Site perimeter, as needed, and would signalize the currently uncontrolled crosswalk across Fairfax Avenue at 1st Street. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. The Applicant would also contribute toward pedestrian facility improvements within the Study Area as part of Vision Zero, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. Lastly, the Project's design would comply with all ADA requirements. These enhancements, in addition to compliance with ADA requirements, would support the policy to enhance the mobility of senior citizens, disabled people, students, and low-income, transit-dependent populations.
Objective 10-2: Increase work trips and non-work trips made on public transit. **Policy 10-2.1:** Develop coordinated intermodal public transit plans to implement linkages to future public transit services.	**No Conflict.** The Project would support the initiatives for an intermodal mass transportation plan by improving pedestrian connections to existing and future transit stops and installing the Mobility Hub to support existing and future multi-modal mobility options. The Project's Mobility Hub 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. In addition, the Project would improve the existing transit infrastructure at bus stops located within the immediate vicinity of the Project Site along Fairfax Avenue and Beverly Boulevard, which would include, where applicable, upgrades to provide adequate benches, shelters, lighting, LED displays, and signage. Additionally, the Project proposes an employee shuttle service between the planned Metro D (Purple) Line Wilshire/Fairfax station and the Project Site to encourage the use of public transit. The Mobility Hub would also support

Table IV.K-2 (Continued)
Project Consistency With the Wilshire Community Plan

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
	future shuttle services to provide a linkage to existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension).
Objective 11-1: Promote an adequate system of Bikeways for commuter, school and recreational use. **Policy 11-1.1:** Encourage funding and construction of bikeways to connect residential neighborhoods to schools, open space areas, and employment centers.	**No Conflict.** The Project would install new traffic signals and upgrade existing signals at access points. These signals would be designed and equipped to the satisfaction of the City. The proposed signalized driveways on Fairfax Avenue and The Grove Drive would facilitate Project access and serve to minimize vehicle conflicts with pedestrians and bicyclists. The Applicant would also contribute to signal improvements at nearby intersections as part of its improvement program. The Applicant would also contribute toward the implementation of bicycle improvements, which may be utilized for commuter, school, and recreational use, such as striped bicycle lanes and shared bicycle lanes (sharrows), on Rosewood Avenue, a Mid-City Low Stress Bicycle Enhanced Corridor, which would include a mini-roundabout at Martel Avenue and Rosewood Avenue. These enhancements would support Policy 11-1.1 to connect residential neighborhoods to schools, open space areas, and employment centers.
Policy 11-1.2: Provide Bikeways along Boulevards II and Avenues in the Wilshire Community Plan Area.	**No Conflict.** The Project would not preclude future improvements to existing and future bicycle infrastructure and would, thus, support the initiatives to construct bikeways along Boulevards II and Avenues in the Community Plan area. Additionally, the Project would include an on-site Mobility Hub that would provide space for bike-share facilities, bicycle rentals, and other similar services that may be available in the future.
Policy 11-1.3: Assure that local bicycle facilities are linked with the facilities of neighboring areas of the City.	**No Conflict.** No bicycle facilities are currently provided adjacent to the Project Site. Fairfax Avenue and Beverly Boulevard are part of the BLN identified in the Mobility Plan, and the Applicant would contribute toward the implementation of bicycle improvements within the Study Area.
Policy 11-1.4: Support the provision of bicycle facilities in all new development.	**No Conflict.** The Project would provide on-site bicycle parking and services, such as valet service, repair stands, showers, and lockers, to encourage bicycling for employees and visitors to the Project Site. The Mobility Hub would also provide space for bike-share facilities, bicycle rentals, and other similar services that may be available in the future. In addition, the Project Applicant would make a financial contribution toward bicycle improvements in the Study Area.
Objective 11-2: Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers. **Policy 11-2.1:** Encourage the safe	**No Conflict.** The Project would provide more pedestrian friendly areas along Fairfax Avenue, Beverly Boulevard, and The Grove Drive to accommodate pedestrian travel and provide a more comfortable pedestrian environment. The Project Site perimeter would be improved with landscaping, such as street trees and shrubs, lighting, wayfinding signage,

Table IV.K-2 (Continued)
Project Consistency With the Wilshire Community Plan

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
utilization of public utility easements and other public rights-of-way along streets wherever feasible for the use of pedestrians.	and pedestrian amenities, such as benches. Along all street edges, pedestrian access and safety would be improved, and bus stops and street lighting would be maintained. The Project would also include sidewalk improvements, with widening in some locations and adjacent frontage areas to provide a transition between the sidewalk and on-site buildings. These landscape and sidewalk improvements around the Project Site perimeter would improve pedestrian safety and comfort. In addition, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding residential streets. In so doing, the Project would support Objective 11-2 to promote pedestrian mobility, safety, amenities, and access and Policy 11-2.1 to encourage the safe utilization of public utility easements and other public rights-of-way along streets wherever feasible for the use of pedestrians.
Policy 11-2.3: Protect and improve existing pedestrian-oriented street segments.	**No Conflict.** The Project would improve existing pedestrian-oriented street segments by providing more pedestrian friendly areas along Fairfax Avenue, Beverly Boulevard, and The Grove Drive and install new landscaping along all public Project Site frontages. The Project would upgrade crosswalks and bus stops around the Project Site perimeter, as needed, and would signalize the currently uncontrolled crosswalk across Fairfax Avenue at 1st Street. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. The Applicant would also contribute toward pedestrian facility improvements within the Study Area as part of Vision Zero, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue.
Objective 12-1: Pursue Transportation Demand Management Strategies that maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips. **Policy 12-1.1:** Encourage non-residential developments to provide employee incentives for using alternatives to the automobile (carpools, van pools, buses, shuttles, subways, bicycles, walking) and provide flexible work schedules.	**No Conflict.** The Project would implement a TDM Program that maximizes vehicle occupancy, minimizes average trip length, and reduces the number of vehicle trips by promoting and providing 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's Mobility Hub would provide employee incentives for using alternatives to the automobile by supporting first-mile/last-mile connections; encouraging employees and visitors to use public transit, carpool, vanpool, and bike/scooter to work; and supporting TDM strategies to further reduce the number of single-occupancy vehicle trips. The TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service to the planned Metro D (Purple) Line Wilshire/Fairfax Station, a ride-share matching and carpool/vanpool program, first-

Table IV.K-2 (Continued)
Project Consistency With the Wilshire Community Plan

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
	mile/last-mile options, and a Guaranteed Ride Home Program. 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.
Policy 12-1.2: Encourage the use of Multiple-Occupancy Vehicle programs for shopping and other non-work activities to reduce midday, evening, and special event traffic.	**No Conflict.** The Project would encourage the use of Multiple-Occupancy Vehicle programs by implementing a TDM Program 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 ride-share matching and carpool/vanpool programs. Additionally, the Project would include various on-site amenities, including a commissary, which would reduce mid-day off-site trips for meals. Furthermore, the Project is located in a dense, urbanized area within walking distance from local-serving commercial retail, restaurant, and supermarket uses that would promote non-automobile trips and pedestrian activity.
Policy 12-1.3: Require that proposals for major non-residential development projects include submission of a TDM Plan to the City.	**No Conflict.** The Project would submit its TDM Program to the City for approval.
Policy 12-1.4: Promote the development of transportation facilities and services that encourage higher transit ridership, increased vehicle occupancy, and improved pedestrian and bicycle access.	**No Conflict.** The Project would promote the development of transportation facilities and services that encourage higher transit ridership, increased vehicle occupancy, and improved pedestrian and bicycle access by implementing a TDM Program to reduce the number of single-occupancy vehicle trips to the Project Site. The TDM Program would include, among other things, a ride-share matching and carpool/vanpool programs. The Project would include an on-site Mobility Hub to provide multi-modal mobility options that would provide better connection to existing and future transit options, encourage transit ridership and improve pedestrian and bicycle access. The Mobility Hub would include bicycle parking and related bicycle services, such as valet service, repair stands, showers, and lockers. Additionally, the Project proposes an employee shuttle service between the future Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site. The Mobility Hub would also support future shuttle services to provide a connection to existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension).
Objective 13-1: Increase traffic capacity on existing freeways and streets, through policy changes, and minor physical	**No Conflict.** The majority, if not all, of the signalized intersections within the City are currently equipped with both ATSAC and ATCS. Nonetheless, the Project Applicant

Table IV.K-2 (Continued)
Project Consistency With the Wilshire Community Plan

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
improvements to existing streets. **Policy 13-1.1:** Install Automated Traffic Surveillance and Control (ATSAC) equipment at all signalized intersections in the Wilshire Community Plan Area.	would contribute toward TSM improvements within the vicinity of the Project Site to improve LADOT's capability to monitor and improve traffic operations on City streets, as detailed in Project Design Feature TR-PDF-4. For example, the installation of new interconnect/fiber optic cables would improve the network capacity to better utilize adaptive traffic signal control and CCTV cameras to allow for real-time video monitoring of intersection, corridor, transit, and pedestrian operations within the Project area. Collectively, the TSM improvements would provide a system-wide benefit by reducing delays experienced by motorists within the Project area.
Policy 13-1.2: Install an Adaptive Traffic Control System (ATCS) at all intersections along Boulevards II and Avenues, and some Collector Streets to improve intersection capacity by an additional 3%. This upgrade of the existing ATSAC system provides an additional capacity enhancement beyond that of ATSAC.	**No Conflict.** As detailed in Policy 13-1.1 and further discussed below, the majority of the signalized intersections within the City are currently equipped with both ATSAC and ATCS. Nonetheless, the Applicant would contribute toward TSM improvements within the vicinity of the Project Site to improve LADOT's capability to monitor and improve traffic operations, thereby improving intersection capacities on City streets, as detailed in Project Design Feature TR-PDF-4.
Policy 13-1.3: Implement or enhance "Smart Corridors" to coordinate Caltrans' freeway traffic management system, with the ATSAC/ATCS street traffic signal management system to enhance incident management and motorist information, and thereby reduce traffic delays.	**No Conflict.** The Project would support the implementation or enhancement of "Smart Corridors." As detailed in Policy 13-1.1 and further discussed below, the Applicant would contribute toward TSM improvements within the vicinity of the Project Site to improve LADOT's capability to monitor and improve traffic operations on City streets, as detailed in Project Design Feature TR-PDF-4, which would enhance incident management and motorist information, and thereby reduce traffic delays.
Policy 13-1.5: Identify and implement intersection improvements (channelization, turn lanes, signal modifications) on all Boulevards II and Avenues, and along some Collector Streets, throughout the Wilshire Community Plan Area.	**No Conflict.** The Project would implement intersection improvements by modifying the existing right-of-way along Fairfax Avenue (a designated Avenue II) and The Grove Drive (a designated Collector Street) to integrate the proposed signalized driveways. Additionally, the Project would widen the roadway on The Grove Drive by 2 feet to provide a dedicated left-turn lane into the Project Site. The modifications would include signal upgrades, striping, and physical modification. The Project would maintain the designated driveway width requirements and would be consistent with the intent of the Mobility Plan. Additionally, per Project Design Feature TR-PDF-5, the Project would contribute to signal improvements at nearby intersections as part of its improvement program, including left-turn signalization at the following three key intersections in coordination with LADOT: Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street.
Objective 14-1: Initiate and continue existing Residential Neighborhood	**No Conflict.** The Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic

Table IV.K-2 (Continued)
Project Consistency With the Wilshire Community Plan

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
Protection Plans to mitigate traffic and parking impacts throughout the Wilshire Community Plan Area. **Policy 14-1.1:** The City Planning Department and LADOT should continue to work closely with the Wilshire Community Plan Area residents to identify existing and anticipated "cut-through" traffic and spillover parking from adjacent commercial areas. Through neighborhood community meetings, traffic calming programs and strategies should be developed for effective Residential Neighborhood Protection Plans.	Management Plan to address potential "cut-through" traffic on surrounding residential streets. Further, the Project would include sufficient parking to meet the needs of employees and visitors at the Project Site, thereby ensuring that there would be no spillover parking.
Policy 14-1.2: Support and research emerging traffic calming techniques as potential traffic mitigation factors in impacted residential neighborhoods.	**No Conflict.** While this policy is primarily directed at the City, the Project would not conflict with or preclude the City's efforts to support and research emerging traffic calming techniques as potential mitigation. Furthermore, as discussed in Policy 14-1.1, the Project would support implementation of traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding residential streets.
Objective 15-1: Provide off-street parking in appropriate locations in accordance with Citywide standards and community needs. **Policy 15-1.1:** Minimize the number of ingress and egress points to and from all Boulevards II and Avenues in the Wilshire Community Plan Area.	**No Conflict.** The roadways surrounding the western and northern boundaries of the Project Site are designated Avenues I or II, and proposed driveways would be located along these roadways. In addition, driveways would be provided along The Grove Drive (a Collector Street) and the Southern Shared Access Drive. Although the Project would result in more ingress and egress points than existing conditions, the Project driveways would be designed to minimize vehicle conflicts with other vehicles, pedestrians, and bicyclists and provide safer pedestrian crossings through pedestrian signal phasing and continental crosswalks. Additionally, the Project would construct a new signalized access point on The Grove Drive, a Collector Street, thereby distributing vehicular access more evenly along the street frontages and across the Project Site. Furthermore, the Project Applicant would contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue.
Policy 15-1.2: Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.	**No Conflict.** The Project would include subterranean parking structures, at-grade and above-grade parking structures and/or surface parking to meet the needs of employees and visitors at the Project Site, which would be designed in accordance with the City's design standards.
Policy 15-1.3: Manage the supply of on-street parking to provide convenient parking for customers of commercial land	**No Conflict.** The Project would include subterranean, at-grade, and above-grade parking structures and/or surface parking to meet the needs of employees and visitors, which

Table IV.K-2 (Continued)
Project Consistency With the Wilshire Community Plan

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
uses and to encourage employees to park in off-street lots or garages or use alternate modes of transportation.	could be accessed from all roadways surrounding the Project Site. The Project's Mobility Hub would be the primary passenger loading area and would provide support for alternate modes of transportation. The Project would not affect existing on-street parking.
Objective 16-1: To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable Levels of Service (LOS) and ensure that necessary Freeway and Street access. **Policy 16-1.1:** To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multimodal transportation (e.g. walking, bicycling, driving and taking public transit) and safety, maintain a satisfactory Level of Service (LOS) above LOS "D" for Boulevards II s, especially those which serve Regional Commercial Centers and Community Commercial Centers; and above LOS "D" for Avenues and Collector Streets.	**No Conflict.** Under SB 743, the transportation analysis methodology shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Notwithstanding, Section 5B of the Transportation Assessment, attached as Appendix M of this Draft EIR, details the LOS operations at the 31 study intersections selected for operational evaluation. As shown in Table 18 therein, upon the Project's anticipated completion in 2026, several intersections on arterial streets would operate at LOS E or F, before and after the addition of Project traffic. The Project would not cause any location to change from LOS D or better to LOS E or F during the morning or afternoon peak hours. The Project would provide pedestrian enhancements around the Project Site, including landscaping, sidewalk and crosswalk improvements, and bus stop improvements. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. Furthermore, the Project would provide first-mile/last-mile services at the Mobility Hub and an employee shuttle to the future Metro D (Purple) Line Wilshire/Fairfax station. The Mobility Hub would also support future shuttle services to provide a connection to existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension). Additionally, the Project's comprehensive TDM Program would encourage travel via alternative transportation modes and reduce single-occupancy vehicle trips. Lastly, the Applicant would contribute toward signal improvements at nearby intersections and the implementation of bicycle improvements within the Study Area.
Policy 16-1.2: Streets should be developed in accordance with standards and criteria contained in the Transportation Element of the General Plan and consistent with the City's Standard Street Dimensions. In some cases exceptions may exist where significant environmental issues and/or sound planning practices may warrant alternate standards, consistent with street performance	**No Conflict.** The Project would include 2 feet of roadway widening on The Grove Drive to provide a dedicated northbound left-turn lane into the Project driveway, and such improvements are not anticipated to interfere with future implementation of roadway improvements. The Project Applicant is requesting a waiver of dedication but would provide a 3-foot public sidewalk easement to widen the existing sidewalk. The proposed dedications and request for a waiver would be reviewed by City staff as part of the Project's entitlements. The Project would be consistent with

Table IV.K-2 (Continued)
Project Consistency With the Wilshire Community Plan

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
standards and traffic flow volume capacity requirements.	the intent of the Mobility Plan through the proposed sidewalk widening. Furthermore, as previously discussed, the total paved widths of streets bordering the Project Site include approximately 55 to 68 feet for Fairfax Avenue, approximately 30 feet for Stanley Avenue, approximately 50 to 54 feet for The Grove Drive, approximately 70 feet for Beverly Boulevard, and approximately 30 feet for West 1st Street. Fairfax Avenue has an existing half-ROW width of 50 feet and exceeds the Mobility Plan standards of 43 feet for an Avenue II. Thus, the Project Applicant is requesting a merger and re-subdivision of the 7-foot excess, which would reduce the existing sidewalk area in the public ROW to 3 feet. As such, a combination of public and private lands together would create a pedestrian zone in keeping with the intent of the Mobility Plan. Specifically, the Project would provide a 12-foot public sidewalk easement to complete an overall 15-foot sidewalk to accommodate pedestrian travel. Beverly Boulevard has an existing half-ROW width of 50 feet and meets the Mobility Plan standards of 50 feet for a Modified Avenue I. The sidewalk width meets the standard of 15 feet adjacent to the Project Site; however, toward Fairfax Avenue where the roadway widens slightly (up to 3 feet) to accommodate the westbound left-turn lane to Fairfax Avenue, the sidewalk is reduced to approximately 12 feet. In consultation with the Los Angeles Bureau of Engineering, the existing configuration is considered generally compliant with the Mobility Plan, and no dedication or widening is required. The Project would maintain the existing roadway and sidewalk configuration. The Grove Drive has an existing half-ROW width of 30 feet, which would be expected to be 33 feet under the Mobility Plan standards for a Collector Street. The Project includes a request for a waiver of dedication of the additional width. The Project would widen the roadway by 2 feet to accommodate a northbound left-turn lane to access the Project Site. The Project would also provide a 3-foot public sidewalk easement to provide a 10-foot sidewalk. Though this remains narrower than the 13-foot standard in the Mobility Plan, it exceeds the existing sidewalk width of 9 feet.
Objective 16-2: Ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure. **Policy 16-2.1:** No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations: The transportation infrastructure serving	**No Conflict.** The Specific Plan would permit up to a maximum of 1,874,000 square feet of floor area within the Project Site. As discussed under Policy 16-1.1, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Notwithstanding, upon the Project's anticipated completion in 2026, several intersections on arterial streets would operate at LOS E or F, before and after the addition of Project traffic. The Project

Table IV.K-2 (Continued)
Project Consistency With the Wilshire Community Plan

Objective, Policy, Program, or Plan[b]	Analysis of Project Consistency
the project site and surrounding area, presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.	would not cause any location to change from LOS D or better to LOS E or F during morning or afternoon peak hours. The Project would provide pedestrian enhancements around the Project Site, including landscaping, sidewalk and crosswalk improvements and bus stop improvements. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. The Project would also provide first-mile/last-mile services at the Mobility Hub and an employee shuttle to the future Metro D (Purple) Line Wilshire/Fairfax station. The Mobility Hub would also support future shuttle services to provide a connection to existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension). Additionally, the Project's comprehensive TDM Program would encourage travel via alternative transportation modes and reduce single-occupancy vehicle trips. Furthermore, the Applicant would contribute toward signal improvements at nearby intersections and the implementation of bicycle improvements within the Study Area. Lastly, the Project will be fully reviewed by City departments, the Planning Commission, and City Council prior to a decision being made.

[a] *Additional Community Plan objectives and policies that are applicable to the Project are discussed in Section IV.H, Land Use, and Table 2 of Appendix I of this Draft EIR.*

[b] *Wilshire Community Plan, Los Angeles Department of City Planning, 2001.*

Source: Gibson Transportation Consulting, Inc., 2021.

scootering to work; and support TDM strategies to further reduce the number of single-occupancy vehicle trips generated by the Project, as discussed in further detail below. The Project's TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service to the planned Metro D (Purple) Line Wilshire/Fairfax Station, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, and a Guaranteed Ride Home Program. In addition, the Project would provide bicycle parking spaces for the proposed uses that would promote walking and the use of bicycles. Specifically, the Project would provide short-term and long-term bicycle parking spaces in accordance with LAMC requirements, including secured bicycle parking facilities, as well as valet service, showers, lockers, and bicycle service areas with repair stands within the Project Site. Furthermore, the Project Applicant would make a financial contribution for bicycle improvements under the Mobility Plan, as well as pedestrian facilities improvements as part of the City's Vision Zero plan. As part of the proposed improvement programs, the Project Applicant would contribute to signal

improvements in the immediate area and to traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding residential streets. Additionally, the proposed signalized driveways on Fairfax Avenue and The Grove Drive would facilitate Project Site access and serve to minimize vehicle conflicts with other vehicles, pedestrians, and bicyclists. Thus, the Project support the transportation-related goals and objectives of the Community Plan.

(c) Plan for a Healthy Los Angeles

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table IV.K-3 on page IV.K-68. In summary, the Project would promote healthy living by encouraging the use of active travel modes. As discussed above, the on-site Mobility Hub would support multi-modal mobility options, such as bike-share services to improve the convenience of making trips without the use of a personal automobile. The Project would provide broader sidewalks and pedestrian-friendly areas along the Project Site frontages to enhance the pedestrian experience and improve connections to existing and future transit stops. Furthermore, the Project would provide bicycle parking and amenities to encourage bicycling and walking for employees and visitors to the Project Site. The Project would also expand employment opportunities in proximity to residential areas, destinations, and other neighborhood services in a dense urban area near transit. Additionally, the Project is estimated to generate lower work VMT per employee than the average for the area, as demonstrated further below. Because VMT directly contributes to GHG emissions, a reduced VMT per capita would also reduce GHG per capita. Finally, the Project would prioritize safety and access for all individuals utilizing the Project Site and would not hinder other goals and policies identified in the Plan for a Healthy Los Angeles. Therefore, the Project would be consistent with, and would not obstruct the implementation of the policies set forth in, the Plan for a Healthy Los Angeles.

(d) LAMC

LAMC Section 12.21 A.16 sets forth bicycle parking requirements for new developments. The Project would provide approximately 195 short-term and 335 long-term bicycle parking spaces (for a total of 530 spaces) in accordance with LAMC requirements, as well as showers, lockers, and bicycle service areas. Thus, the Project would be consistent with LAMC Section 12.21 A.16. The City's TDM Ordinance, set forth in LAMC Section 12.26 J, establishes TDM requirements for non-residential projects greater than 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, access from the external circulation system to LAMC-required bicycle 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. In the LADOT Assessment Letter provided in Appendix M of this Draft EIR, LADOT indicated that the Project Applicant shall provide

Table IV.K-3
Project Consistency With the Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
Chapter 1: Los Angeles, a Leader in Health and Equity	
Policy 1.5 Plan for Health: Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	**No Conflict.** The Project supports initiatives to create transit-oriented developments by expanding employment opportunities and promoting the jobs/housing balance in a dense urban area served by transit. The Project provides bicycle parking and amenities to encourage bicycling for employees and visitors to the Project Site. It would also provide pedestrian and transit enhancements around the Project Site, including landscaping, sidewalk and crosswalk improvements, and bus stop improvements. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. In addition, the Project Applicant would contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. The Project would also provide multi-modal mobility options that would provide better connection to existing and future transit options (e.g., the future Metro D Line Wilshire/Fairfax Station). Furthermore, the Mobility Hub would support future shuttle services to provide a connection to existing and/or future transit stations (e.g., the Metro B Line or Crenshaw North Extension).
Policy 1.7 Displacement and Health: Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.	**No Conflict.** The Project would provide employment and entrepreneurial opportunities through its continuation and expansion of existing studio-related uses and commercial space. The Project would not displace any existing housing as no housing currently exists on-site. Furthermore, the Project would not displace any existing residents, tenants, or services as the Project would not cause the removal of any off-site uses.
Chapter 2—A City Built for Health	
Policy 2.1 Access to Goods and Services: 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.	**No Conflict.** The Project would provide up to 20,000 square feet of commercial space on the ground level of the Project Site, easily accessed by foot from the surrounding residential neighborhoods.

Table IV.K-3 (Continued)
Project Consistency With the Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan[a]	Analysis of Project Consistency
Chapter 5—An Environment Where Life Thrives	
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.	**No Conflict.** The Project is estimated to generate lower work VMT per employee than the average for the area, as demonstrated further in this section. Furthermore, the Project would implement a comprehensive TDM Program, described in Project Design Feature TR-PDF-2, to further reduce VMT per capita. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.

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

Source: Gibson Transportation Consulting, Inc., 2021.

specific improvements to the bus stops along Fairfax Avenue and Beverly Boulevard, including adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. Transportation information and carpool/vanpool loading areas would be provided at the on-site Mobility Hub. Designated carpool/vanpool parking would be provided in the parking structures. The Project's internal circulation system would provide pathways for pedestrians and bicycles to the public streets and sidewalks, and the Project would provide pedestrian and transit enhancements around the Project Site. In addition to the requirements of the TDM Ordinance, the Project would implement a comprehensive TDM Program that includes the following measures, as further detailed 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
- Local Transit Infrastructure Improvements
- Shuttle Service

- Neighborhood Enhancements

Although not yet adopted, a draft of the City's updated TDM Ordinance was released in June 2021. It requires more comprehensive TDM programs and applies to a broader range of development projects. The TDM measures to be incorporated into the Project's TDM Program meet the requirements of the updated draft TDM Ordinance, as currently drafted. Additionally, the Project would incorporate TDM monitoring and reporting in compliance with the updated TDM Ordinance.

With regard to parking, the proposed Specific Plan would supersede LAMC parking requirements. Section 11 of the Specific Plan establishes parking requirements for each of the main land use categories (sound stages, production support, production office, general office, and retail uses), ranging from one to three parking spaces per 1,000 square feet of floor area. Specifically, for every 1,000 square feet of floor area: two parking spaces would be required for retail uses, production support uses, and all other uses permitted under the Specific Plan (excluding sound stages, production office, and general office uses); 2.5 parking spaces would be required for sound stage uses; and three parking spaces would be required for production office and general office uses. Childcare, security stations, basecamp, and non-occupiable structures, such as sets/façades, kiosks, infrastructure-related facilities, and parking/entry facilities, would not require dedicated parking. Vehicles may be parked in tandem (double or triple) or by valet, depending on the specific parking layout. In addition, the Specific Plan sets forth a process for the approval and implementation of a reduced/shared parking plan, so long as an adequate parking supply is maintained. Additionally, parking may be located anywhere within the Project Site or off-site upon submittal of an off-site parking agreement or covenant satisfactory to the Director of the Department of City Planning. Furthermore, temporary off-site parking due to displacement resulting from production filming and related activities may be provided, with shuttle service to the Project Site as needed. Lastly, existing uses and facilities may be maintained without changes in their respective existing parking requirements.

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's digital signage, if any, visible from the surrounding roadways would comply with this requirement, and the Project would not conflict with LAMC Section 14.4.5.A.

CVC Section 21466.5 provides lighting thresholds to ensure that lighting does not impair the vision of drivers upon the highway. Specifically, the maximum measured brightness of a light source within 10 degrees from the driver's normal line-of-sight shall not be more than 1,000 times the maximum measured brightness in the driver's field of view,

with certain exceptions. All digital signage visible from surrounding roadways would comply with this requirement, and the Project would not conflict with CVC Section 21466.5.

In summary, the Project would meet the applicable LAMC requirements.

(e) Vision Zero

As discussed above, the Project is located adjacent to Fairfax Avenue and Beverly Boulevard and within the vicinity of West 3rd Street, all of which have been identified as HIN corridors. In addition to the previously discussed pedestrian improvements proposed in and around the Project Site, the Project includes Project Design Feature TR-PDF-3 to implement certain off-site Vision Zero safety improvements, including bus stop improvements along the Project Site perimeter along Fairfax Avenue and Beverly Boulevard, which would include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract; and a financial contribution toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. The Project's improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Additionally, per Project Design Feature TR-PDF-5, the Project Applicant would contribute to signal improvements at other nearby intersections as part of the Project's improvement program, including left-turn signalization at the following three key intersections in coordination with LADOT: Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street. Thus, the Project would not conflict with Vision Zero.

(f) Citywide Design Guidelines

As discussed in Section IV.H, Land Use and Planning, of this Draft EIR, the Citywide Design Guidelines are intended to be performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all objectives will be appropriate in every case. The Citywide Design Guidelines are organized around three design approaches: pedestrian-first design, 360-degree design, and climate-adapted design. The three guidelines under the pedestrian-first design are applicable to the Project in that they seek to promote a safe, comfortable and accessible pedestrian experience, to carefully incorporate vehicular access to avoid degrading the pedestrian experience, and to design projects to actively engage with streets and public space. Consistent with the Citywide Design Guidelines, the Project would provide pedestrian and transit enhancements within and around the Project Site, including landscaping, sidewalk and crosswalk improvements, and bus stop improvements. Crosswalks would be upgraded to improve visibility, and bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract. In addition, the Project Applicant would contribute

toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. As previously discussed, the Project Site's proximity to transit services and construction of the Mobility Hub would encourage the use of transit and other alternative modes of transportation. The design of all Project vehicular access points would be subject to the review and approval of LADOT and the Bureau of Engineering. Dedicated pedestrian and bicycle access to the Project Site also would be provided. Thus, the Project would align with the pedestrian-first design approach to provide a safe, comfortable, and accessible experience for all transportation modes.

Refer to Section IV.H, Land Use and Planning, of this Draft EIR, for a detailed analysis of the Project's consistency with each of the Citywide Design Guidelines. Based on the analysis therein and the discussion above, the Project would be consistent with the Citywide Design Guidelines.

(g) Other Plans and Policies

As discussed in detail in Section IV.H, Land Use and Planning, of this Draft EIR, the Project would not conflict with SCAG's RTP/SCS policies to encourage pedestrian activity and reduce VMT.

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, impacts 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

As described in detail in the Transportation Assessment, LADOT's VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator has built-in land use characteristics for common land uses, but does not include sound stage and production-related uses. As directed by LADOT, to incorporate land uses that are not built in, the VMT Calculator allows the analyst to define a single custom land use and manually enter its land use and travel demand characteristics. Therefore, all of the Project's studio-related uses—including sound stage, production support, production office, and general office uses, representing approximately 1,854,000 square feet of total permitted floor area—were input into the VMT Calculator as a combined custom studio land use. The Project's proposed 20,000 square feet of retail space was assessed using a built-in rate. Specifically, for the purposes of providing a conservative analysis, the approximately 20,000 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.K-4 on page IV.K-74 shows the calculation of daily trips and total employees associated with the approximately 1,854,000 square feet of non-retail, studio-related land uses included as part of the custom land use in the VMT Calculator.[21] Collectively, these uses are estimated to generate 16,044 trips before transit/walk-in adjustments. As calculated in Table 3 of the Initial Study, provided in Appendix A of this Draft EIR, based on the VMT Calculator Documentation and relevant empirical data, the non-retail uses would employ an estimated 7,752 employees. 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 7,752 non-retail employees generating 16,044 trips before transit/walk-in adjustments.

The retail space would generate approximately 80 retail employees (as calculated internally by the VMT Calculator as a built-in land use, consistent with Table 3 of the Initial Study), for a total estimated Project employment of 7,832 people at buildout.

[21] The maximum 1,874,000 square feet of floor area upon completion (1,854,000 square feet of non-retail and 20,000 square feet of retail) includes up to 247,820 square feet of existing space to remain and up to 1,626,180 square feet of new construction (1,130,320 net new square feet).

Table IV.K-4
Custom Land Use Inputs for VMT Analysis[a]

Land Use	Size	Daily Vehicle Trip Rates (per 1,000 sf)	Daily Vehicle Trips[b]
Sound Stages[c]	350,000 sf	5.91	2,069
Production Support[c]	104,000 sf	4.94	431
Production Office[c]	700,000 sf	9.34	6,538
General Office[d]	700,000 sf	10.06	7,006
Total Studio, Production, and Office Uses	**1,854,000 sf**		**16,044**
Non-Retail Employee Estimate[e]	**7,752 non-retail employees**		

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 gross total Project floor area (i.e., 1,854,000 square feet of total permitted non-retail development) at the Project Site. 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. These estimates do not include trips or employees associated with the Project's 20,000 square feet of retail space, which was input to the VMT Calculator using a built-in land use.*

[b] *Daily trip estimates exclude the 15 percent transit/walk-in credit since transit usage assumptions are built into the VMT Calculator.*

[c] *Trip generation rates for sound stages, 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 impact studies, including the Transportation Analysis for NBC Universal Evolution Plan Alternative 10 (Gibson Transportation Consulting, 2012) and Transportation Study for the Paramount Pictures Master Plan (Gibson Transportation Consulting, 2015).*

[d] *Trip generation rates for General Office based on the best-fit curve formulas listed in Trip Generation Manual, 10th Edition and is approximately equivalent to 10.06 daily trips per 1,000 sf:*

Weekday Daily: Ln(T) = 0.97 Ln(X) + 2.50 T = Average Vehicle Trips X = Gross Leasable Area (1,000 sf)

[e] *The Applicant estimates a total of 7,752 non-retail employees for the Project Site.*

Source: Gibson Transportation Consulting, Inc., 2021.

Though the Project includes a comprehensive TDM Program described in Project Design Feature TR-PDF-2, the VMT analysis conservatively excludes most of those 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 secure bike parking and showers. For additional information and to support other Project analysis under CEQA, a supplemental VMT analysis incorporating all TDM strategies proposed by the Project that can be evaluated as part of the built-in TDM strategies in the VMT

Calculator is provided in Appendix E of the Transportation Assessment, included in Appendix M of this Draft EIR.[22]

Table IV.K-5 on page IV.K-76 summarizes the results of the analysis using the VMT Calculator. It includes estimates of gross daily vehicle trips and total VMT,[23] the total estimated employee population, the significance thresholds for the Central APC, and the calculation of the Project's VMT per employee. As shown in Table IV.K-5, the Project is estimated to generate 52,194 total work VMT prior to the incorporation of additional TDM measures. Based on the estimate of 7,832 employees, the Project would generate an average work VMT per employee of 6.7, which is less than the Central APC impact threshold of 7.6. **Therefore, the Project would not result in a significant VMT impact.** As previously noted, the additional TDM measures would further reduce VMT per employee.

While the analysis above considers the VMT impacts associated with the proposed development program detailed in Section II, Project Description, of this Draft EIR, additional analysis was conducted to determine the potential VMT impacts from other buildout scenarios that would be permitted under the proposed land use exchange program. As discussed further in Section IV.H, Land Use and Planning, of this Draft EIR, the proposed Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and/or production support floor area as long as the limitations set forth in the Specific Plan are met. In particular, the total permitted floor area on-site must not exceed 1,874,000 square feet, and the sitewide floor area ratio must not exceed 1.75:1. Accordingly, the Supplemental VMT Memo included in Appendix M of this Draft EIR was prepared to provide a thorough and conservative assessment of all potential Project VMT impacts. The following two maximum transportation impact scenarios for the Project were identified for further VMT evaluation:[24]

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[22] The supplemental VMT analysis incorporating all TDM measures supports the Project's CEQA analyses of air quality, energy, and greenhouse gas.

[23] The VMT analysis generated by the VMT Calculator is based on the total gross Project at completion, which is reported in Table IV.K-5. However, when considering the existing uses on the Project Site, the Project would generate approximately 9,733 net new daily trips and 69,055 net new VMT.

[24] The scenarios identified for evaluation represent hypothetical land use mixes that were defined based on their potential to result in a maximum VMT-related impact. However, such scenarios may not include a realistic combination of uses necessary to create a functioning production studio and/or may not meet the Project Objectives set forth in Section II, Project Description, of this Draft EIR.

Table IV.K-5
Project VMT Analysis Summary

Land Use Information	
Stage, Production, and Office Uses[a]	1,854,000 sf
Retail Uses[b]	20,000 sf
Gross Total Project VMT Analysis[c]	
Residential Population[d]	N/A
Employee Population[d]	7,832
Gross Total Daily Vehicle Trips	13,454
Gross Total Daily VMT	95,865
Total Household VMT	N/A
Household VMT per Capita	N/A
Impact Threshold	6.0
Significant Impact?	No
Total Work VMT	52,194
Work VMT per Employee[e]	6.7
Impact Threshold	7.6
Significant Impact?	No

sf = square feet

N/A = Not Applicable

[a] *A custom land use was developed based on information in Table IV.K-4 on page IV.K-74.*

[b] *For the purposes of providing a more conservative analysis, the 20,000 square feet of retail space was considered to be a high-turnover restaurant use.*

[c] *The gross total Project analysis is based on outputs from the City of Los Angeles VMT Calculator Version 1.3 (July 2020). The VMT forecasts incorporate VMT reductions associated with the implementation of TDM strategies as part of the Project including the provision of LAMC-required bicycle-parking and bicycle amenities.*

[d] *The Project does not include residential uses, therefore, residential population and household VMT do not apply to the Project. Total employment population estimates include studio, production, and office employment estimates, as detailed in Table IV.K-4 on page IV.K-74, and retail employment factors, as detailed in City of Los Angeles VMT Calculator Documentation (LADOT and the Department of City Planning, July 2020).*

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

Source: Gibson Transportation Consulting, Inc., 2021.

- Maximum transportation impact scenario 1 involves an exchange of 100,000 square feet of production support for an additional 100,000 square feet of sound stages. This scenario thus includes 450,000 square feet of total sound stage floor area and 4,000 square feet of production support. The floor area of the remaining land use categories would remain unchanged from the proposed development program.

- Maximum transportation impact scenario 2 involves an exchange of 350,000 square feet of sound stage space for an additional 350,000 square feet of production support. This scenario thus includes 454,000 square feet of production support and no sound stages. The floor area of the remaining land use categories would remain unchanged from the proposed development program.

As evaluated in the Supplemental VMT Memo, maximum transportation impact scenario 1 would generate a higher total work VMT but a lower work VMT per employee than the proposed development program. Specifically, maximum transportation impact scenario 1 would generate approximately 52,762 daily work VMT and an average work VMT per employee of 6.4, which would not exceed the impact threshold of 7.6. Maximum transportation impact scenario 2 would generate a lower total work VMT but a higher work VMT per employee than the proposed development program. Specifically, maximum transportation impact scenario 2 would generate approximately 50,203 daily work VMT and an average work VMT per employee of 7.6, which would meet but not exceed the impact threshold of 7.6. By comparison, the Project under the proposed development program is estimated to generate 52,194 total daily work VMT prior to the incorporation of additional TDM measures and an average work VMT per employee of 6.7, as discussed above.

Although the maximum transportation impact scenarios would be permitted under the land use exchange program set forth in the Specific Plan, they do not represent likely development scenarios, as a balance of sound stages and production support uses are necessary for a functioning studio campus and in order to meet the Project Objectives set forth in Section II, Project Description, of this Draft EIR. However, these scenarios were analyzed because they would result in certain greater VMT impacts than the proposed development program. As discussed above, maximum transportation impact scenario 1 would result in higher total work VMT than the proposed development program and maximum transportation impact scenario 2 would result in higher work VMT per employee than the proposed development program. Nevertheless, as detailed in the Supplemental VMT Memo, the maximum transportation impact scenarios would not exceed the City's significance threshold of 7.6 for the Central APC. **As such, the maximum possible VMT impacts associated with the Project's land use exchange program would be less than significant.** LADOT concurred with these findings in its correspondence dated March 17, 2022.[25]

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 impacts would be less than significant.

[25] See Appendix M of this Draft EIR.

(2) Mitigation Measures

No Project-level impacts related to VMT would occur. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

No Project-level impacts related to VMT would occur. 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

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 proposed uses are consistent with the types of studio and related commercial uses already present on-site. **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 impacts would be less than significant.** Nonetheless, analysis of this issue is provided in Section 4C of the Transportation Assessment.

(a) Freeway Safety Analysis

As discussed above in the Regulatory Framework, in May 2020, LADOT provided interim 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 one off-ramp: the US-101 southbound off-ramp at Highland Avenue, where the off-ramp traffic merges with southbound Cahuenga Boulevard and is controlled by the intersection of Cahuenga Boulevard and Pilgrimage Bridge, approximately three miles northeast of the Project Site.

The 95th percentile ramp queue was calculated using the *Highway Capacity Manual, 6th Edition* (HCM) methodology used in the operating conditions analysis in Section 5B of the Transportation Assessment.[26] The 95th percentile ramp queue represents the longest vehicular queue that would be expected during 95 percent of similar peak hours. Conditions were analyzed for year 2026, both without and with traffic from the Project.

The results of the analysis indicate that the queue length under Future with Project Conditions would be 1.7 vehicle lengths (approximately 43 feet based on 25 feet per vehicle) during the morning peak hour and 4.3 vehicle lengths (approximately 108 feet) during the afternoon peak hour, compared with a ramp length of approximately 4,850 feet.

Since the queue at the off-ramp would not exceed the ramp storage length and because the Project would not add 50 feet or more to any peak hour queue compared to Future Without Project Conditions, the Project would not be subject to a speed differential analysis. As such, the Project would not cause a significant safety impact, and impacts related to freeway safety would be less than significant.

In addition, US-101 is an eight-lane freeway facility that has an hourly capacity of 14,000 to 16,000 vehicles per hour. The Project is not expected to have any measurable impacts on operation of US-101. Nonetheless, the Project would implement a comprehensive 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.

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[26] Transportation Research Board, *Highway Capacity Manual, 6th Edition*, 2016

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 Project Applicant will designate a construction manager to serve as a liaison with the surrounding community and respond to any construction-related inquiries. Operation of the Project would generate traffic in the Project vicinity and would result in limited modifications to Project Site access, primarily in expanding the number of access points. Additionally, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. **As such, as determined in the Initial Study, the Project would not result in inadequate emergency access. Impacts related to inadequate emergency access would be less than significant, and no further analysis is required.**

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The Specific Plan and MMRP 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 2026 under the most conservative analysis, including buildout of all related projects by then. Furthermore, with the exception of the freeway safety analysis, discussed below, 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.

With regard to the freeway safety analysis, in year 2026, the 95th percentile queue at the US-101 southbound off-ramp at Highland Avenue would be approximately two percent of the ramp storage capacity. The year 2026 analysis already accounts for traffic growth from related projects and one percent annual ambient growth over existing conditions. When estimating traffic over longer buildout periods, LADOT typically uses a lower ambient growth rate such as 0.5 percent per year, recognizing that the combination of related project traffic and ambient growth generally overestimates traffic growth over a long timeframe. Nonetheless, even if traffic were to increase substantially by year 2043, the conclusions of the freeway safety analysis above would not be affected, and no long-range significant impact would occur.

f. Cumulative Impacts

(1) Impact Analysis

(a) Consistency with Transportation Plans and Policies

In accordance with the TAG, the cumulative analysis of consistency with transportation plans and policies must include consideration of any related projects within 0.5 mile of the Project Site and any transportation system improvements in the vicinity. As shown in Figure III-1 in Section III, Environmental Setting, of the Draft EIR, a total of 68 related projects are located generally within 0.5 mile of the Project Site.[27] The related projects comprise a variety of uses, including apartments, condominiums, restaurants, office space, institutional uses, and retail uses, as well as mixed-use developments incorporating some or all of these elements. Although the buildout years of many of the related projects are uncertain and may well extend beyond the Project's buildout year, and notwithstanding that some may not ultimately be approved or developed, all related projects were assumed to be completed by the estimated 2026 Project buildout year for purposes of the traffic analysis.

The majority of the programs, plans, policies, and ordinances reviewed above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21 A.16 and the TDM Ordinance from LAMC Section 12.26 J apply to projects individually. Also, in many cases, the Project (which

[27] While the majority of the related projects under consideration are located within 0.5 mile of the Project Site, several more distant projects, including a few located in the Cities of Beverly Hills and West Hollywood, are included as well.

provides a mix of land uses) would specifically support key policies (such as enhancing pedestrian infrastructure), while many of the nearby related projects would neither support nor interfere with such policies. In addition, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. **Therefore, the Project, together with the 68 related projects, would not create inconsistencies or result in cumulative impacts with respect to applicable programs, plans, policies, and ordinances.**

(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. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be consistent with the RTP/SCS and, therefore, would have no cumulative VMT impact. **Therefore, the Project would not have a cumulatively significant VMT impact**.

(c) Hazardous Design Features

According to the TAG, a cumulative impact analysis for potential geometric design or land use hazards should consider the effect of access to related projects in the same block as the Project Site. However, there are no related projects on the same block as the Project Site. Traffic from some of the related projects may affect the amount of traffic on the streets adjacent to the Project Site but would not influence the design of Project Site access. **Therefore, the Project would not result in cumulative impacts that would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts. Cumulative impacts related to hazardous design features would be less than significant.**

(d) Inadequate Emergency Access

As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with the applicable emergency vehicle access requirements would be confirmed as part of LAFD's fire/life safety plan review and inspection for new construction projects, as set forth in LAMC Section 57.118, which are required prior to the issuance of a building permit. Moreover, the additional traffic generated by the related projects would be dispersed throughout the area and would not be concentrated in a specific location. Furthermore, as previously discussed, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing

traffic. Therefore, as with the Project, the related projects would not result in inadequate emergency access. **As such, Project impacts to emergency access 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; hazardous geometric design features; and inadequate emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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.