

IV. Environmental Impact Analysis

L. Transportation

1. Introduction

This section of the Draft EIR analyzes the Project's potential transportation/traffic impacts. This section is based on the *CEQA Thresholds Analysis For The 1111 Sunset Boulevard Mixed Use Project* (Transportation Analysis) prepared by Gibson Transportation Consulting, Inc., dated October 2020 and included in Appendix Q.1 of this Draft EIR. The Transportation Analysis follows the Los Angeles Department of Transportation's (LADOT) July 2020 *Transportation Assessment Guidelines* (TAG), which are described in more detail below. The Transportation Analysis was approved by LADOT on November 2, 2020. A copy of LADOT's Assessment Letter is included as Appendix Q.2 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) California Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which went into effect in January 2014, and directed the Governor's Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (LOS). This started a process that changes the requirements for 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. As set forth in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to

Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743, which had been released August 6, 2014. Of particular relevance was the updated text of CEQA Guidelines Section 15064.3, which establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts.

SB 743 also adds Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”¹ A “transit priority area” is defined as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”² PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”³ PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.” PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.⁴

The Project is mixed use residential project that includes residential, office, and commercial uses. In addition, hotel uses are proposed under the Mixed Use Development Scenario. In addition, the Project is also considered an employment center project because it is located on property that is zoned for commercial uses and would include development of a hotel (under the Mixed Use Development Scenario), as well as office and commercial uses with a floor-area ratio (FAR) no less than 0.75 and that is located within a transit priority area. In addition, the Project Site is located on an infill site within 0.5 mile from major transit stops. As described below, the Project Site is served by numerous Los Angeles County Metropolitan Transportation Authority (Metro) bus lines and LADOT transit service, the majority of which provide a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Project is located

¹ PRC Section 21099(d)(1).

² PRC Section 21099(a)(7).

³ PRC Section 21064.3.

⁴ PRC Section 21099(a)(4).

in a transit priority area, as defined in PRC Section 21099.⁵ As such, pursuant to PRC Section 21099, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment. Refer to Section II, Project Description, of this Draft EIR, for a discussion of the Project's parking.

(2) CEQA Guidelines Section 15064.3

As discussed above, 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 or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 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 in determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the City's TAG.

(3) Congestion Management Program

The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. The CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Metro initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019,

⁵ *The City's ZIMAS System confirms the location of the Project Site within a Transit Priority Area. See Zoning Information File No. 2452 and Parcel Profile Report for 1111 W. Sunset Boulevard, www.zimas.lacity.org.*

Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

(4) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016–2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region’s future mobility and housing needs with economic, environmental and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations (MPO) throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.⁶ Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for High-Quality Transit Areas (HQTAs), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.⁷ Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.⁸ The Project Site is located within an HQTAs as designated by the 2016–2040 RTP/SCS.^{9,10} Refer to Section IV.H, Land Use, of this Draft EIR, for a detailed discussion of the relevant provisions of the 2016–2040 RTP/SCS that apply to the Project.

On September 1, 2020, SCAG’s Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.¹¹ As with the 2016–2020

⁶ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 166.

⁷ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.

⁸ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 76.

⁹ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 77, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan.

¹⁰ Los Angeles County Metropolitan Transportation Authority (Metro), High Quality Transit Areas—Southwest Quadrant map.

¹¹ SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.

RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.¹² The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS, the Project would also be consistent with the 2020–2045 RTP/SCS.¹³ As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project on May 21, 2018, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

(5) Framework Element and Mobility Plan 2035

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

In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which is an update to the Transportation Element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.¹⁴ 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 2035* includes goals that define the City's five main priorities: (1) Safety First; (2) World-Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environmental & Healthy Communities. The Plan serves to meet the goals in SCAG's RTP to decrease the

¹² SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal*, September 3, 2020.

¹³ For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within a High-Quality Transit Area (HQT), would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.

¹⁴ 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.

VTM per capita by 5 percent every five years, to 20 percent by 2035, and to meet a 9 percent per capita greenhouse gas reduction by 2020 and a 16 percent per capita reduction by 2035.

Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan. Refer to Section IV.H, Land Use, of this Draft EIR for a discussion of the Project's consistency with the Transportation Chapter of the Framework Element and with Mobility Plan 2035.

Street classifications/standards are designated in the Transportation Element of the City of Los Angeles General Plan. The Mobility Plan has modified those street standards to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access.

The Mobility Plan also includes the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network. The Transit Enhanced Network is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within 1 mile of the network by 2035. The Mobility Plan proposes to design and implement by 2035 Pedestrian Enhanced Districts within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and areas with the highest concentration of pedestrian fatalities and severe injuries. Pedestrian Enhanced Districts include pedestrian improvements on arterial streets that are intended to provide better walking connections to and from the major destinations within communities. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

(6) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (LADCP, March 2015) (Plan for a Healthy Los Angeles) introduces guidelines for the City to follow 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) Los Angeles Municipal Code (LAMC)

The LAMC includes numerous provisions regarding transportation that apply to the Project including Section 12.21.A.16 regarding bicycle parking, Section 12.26 J regarding transportation demand measures (TDM), and Section 12.37 regarding roadway/right-of-way dedications and improvements. In addition, with regard to construction traffic, 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.

(8) Vision Zero

As described in *Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025* (City of Los Angeles, August 2015), Vision Zero is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death. Vision Zero has identified the High Injury Network, a network of streets based on the collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. Sunset Boulevard has been identified in the High Injury Network.

(9) Citywide Design Guidelines

Citywide Design Guidelines (Los Angeles City Planning Urban Design Studio, October 2019) (Design Guidelines) identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The Design Guidelines are organized around three design approaches: pedestrian-first design, 360 degree design, and climate-adapted design.

(10) LADOT Interim Guidance for Freeway Safety Analysis

LADOT's *Interim Guidance for Freeway Safety Analysis* (City Freeway Guidance) identifies City requirements for a CEQA safety analysis of California Department of Transportation (Caltrans) facilities as part of a transportation assessment.¹⁵ The City Freeway Guidance relates to the identification of potential safety impacts related to vehicle queuing at freeway off-ramps due to increased traffic from development projects. It provides interim guidance regarding a methodology and significance criteria for assessing whether additional vehicle queuing 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.

¹⁵ Los Angeles Department of Transportation, *Interim Guidance for Freeway Safety Analysis*, May 2020.

b. Existing Conditions

The following discussion describes key streets and transit routes serving the Project Site, along with other development and infrastructure projects that could affect the Study Area (the geographic area analyzed in the Transportation Analysis, which includes facilities as far as 1 mile from the Project Site) prior to completion of the Project.

(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:

- Sunset Boulevard/Cesar E. Chavez Avenue—Sunset Boulevard/Cesar E. Chavez Avenue is a designated Avenue I and travels in the east-west direction. It is located adjacent to the western boundary of the Project Site and provides four to six travel lanes, two or three lanes in each direction, with a center left-turn lane. Metered parking with peak-hour restrictions is generally available along Sunset Boulevard/Cesar E. Chavez Avenue within the Study Area. The curb lanes, when available, are restricted to transit bus use (including the Dodger Stadium Express shuttle to and from Union Station and the South Bay on Dodgers gamedays). Inside lanes are typically 10 feet wide and the total paved width is typically 70 feet. Sunset Boulevard/Cesar E. Chavez Avenue is part of the Transit Enhanced Network, the Bicycle Enhanced Network, and the Pedestrian Enhanced District. Additionally, it is designated as part of the High Injury Network northwest of SR 110.
- College Street—College Street is a Local Street west of Adobe Street, a Collector between Adobe Street and Hill Street, a designated Avenue III between Hill Street and Alameda Street, and a Modified Collector east of Alameda Street. The street travels in the east-west direction and begins approximately 600 feet east of the Project Site. It provides two to four travel lanes in each direction, with left-turn lanes at intersections. Metered parking with peak-hour restrictions is generally available along College Street. College Street is part of the Neighborhood Enhanced Network between Centennial Street and Figueroa Terrace and the Pedestrian Enhanced District east of New Depot Street. It is identified as part of the High Injury Network east of Yale Street.
- Alpine Street—Alpine Street is a designated Collector west of Hill Street and a designated Avenue III east of Hill Street. It travels in the east-west direction and

is located adjacent to the northern boundary of the Project Site. It provides two travel lanes. Metered parking with peak-hour restrictions is generally available along Alpine street within the Study Area. Alpine Street is part of the Neighborhood Enhanced Network and is also part of the High Injury Network between Broadway and Alameda Street.

- Temple Street—Temple Street is a designated Avenue II and travels in the east-west direction. It is located approximately 0.25 mile southwest of the Project Site and provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections. On-street parking is generally available along Temple Street west of Boylston Street within the Study Area. Temple Street is part of the Bicycle Enhanced Network west of Beaudry Avenue and the Pedestrian Enhanced District. It is identified as part of the High Injury Network throughout the Study Area.
- 1st Street/Beverly Boulevard—1st Street/Beverly Boulevard is a designated Boulevard II and travels in the east-west direction. It is located approximately 0.6 mile southwest of the Project Site and provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections. Metered parking with peak-hour restrictions is generally available along 1st Street/Beverly Boulevard within the Study Area. Bicycle lanes are provided on both sides of the street. 1st Street/Beverly Boulevard is part of the Transit Enhanced Network, Bicycle Enhanced Network, and the Pedestrian Enhanced District. It is identified as part of the High Injury Network east of Olive Avenue.
- 2nd Street—2nd Street is a designated Modified Avenue III. It travels in the east-west direction and is located approximately 0.7 mile south of the Project Site. It provides two travel lanes, one in each direction, with left-turn lanes at intersections. Metered parking is generally available on both sides of the street east of Los Angeles Street. Bicycle lanes are provided on both sides of the street. 2nd Street is part of the Bicycle Enhanced Network and the Pedestrian Enhanced District.
- 3rd Street—3rd Street is a designated Avenue II west of Figueroa Street, Modified Boulevard II between Figueroa Street and Flower Street, Modified Avenue II between Flower Street and Hope Street, and Modified Avenue III east of Hope Street. It travels in the east-west direction and is located approximately 0.8 mile southwest of the Project Site. It provides between two and four westbound travel lanes east of SR 110, and four lanes of two-way traffic west of SR 110. Metered parking is generally available along 3rd Street, except between SR 110 and Hill Street. 3rd Street is part of the Transit Enhanced Network west of Bixel Street and the Pedestrian Enhanced District.
- Echo Park Avenue—Echo Park Avenue is a Collector and travels in the north-south direction. It is located approximately 0.7 mile northwest of the Project Site and provides four travel lanes, two in each direction, with left-turn lanes at intersections. On-street parking is available along Echo Park Avenue within the

Study Area. It is part of the High Injury Network between Montana Street and Sunset Boulevard.

- Vin Scully Avenue—Vin Scully Avenue (formerly Elysian Park Avenue) is a designated Avenue I and travels in the east-west direction (though is considered a north-south street for the purposes of this analysis). It is located approximately 0.4 mile north of the Project Site and provides six travel lanes, three in each direction. It connects Sunset Boulevard to Dodger Stadium and is operated, using cones and traffic control officers, with up to five lanes in a single direction during Dodgers game ingress and egress. On-street parking is available along Vin Scully Avenue with afternoon peak-hour restrictions. Vin Scully Avenue is part of the Pedestrian Enhanced District.
- Marion Avenue—Marion Avenue is a Collector and travels in the east-west direction (though is considered a north-south street for the purposes of this analysis). It begins approximately 500 feet northwest of the Project Site and provides two travel lanes with a center left-turn median. On-street parking is available along Marion Avenue.
- Bellevue Avenue—Bellevue Avenue is a Collector. The street travels in the east-west direction and is located approximately 0.25 mile west of the Project Site. It provides two lanes with a center left-turn median. On-street parking is generally available along Bellevue Avenue. Bellevue Avenue is part of the Neighborhood Enhanced Network.
- Beaudry Avenue—Beaudry Avenue is a Collector north of Sunset Boulevard, a designated Avenue II between Sunset Boulevard and Temple Street, a designated Avenue I between Temple Street and 1st Street, and a designated Avenue II south of Temple Street. The street travels in the north-south direction and is located adjacent to the southern boundary of the Project Site. It provides two travel lanes north of Sunset Boulevard, one in each direction, and four travel lanes south of Sunset Boulevard, two lanes in each direction. On-street parking is generally available along Beaudry Avenue. Beaudry Avenue is part of the Pedestrian Enhanced District south of Sunset Boulevard.
- Figueroa Street—Figueroa Street is a designated Boulevard II and travels in the north-south direction. It is located approximately 0.2 mile southeast of the Project Site and provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections. South of 3rd Street, Figueroa Street is a one-way street in the northbound direction. Metered parking is generally available along Figueroa Street within the Study Area. There is a northbound bus-only lane south of 3rd Street and bicycle lanes north of 3rd Street. Figueroa Street is part of the Bicycle Enhanced Network south of Sunset Boulevard/Cesar E. Chavez Avenue and the Pedestrian Enhanced District north of Temple Street and south of 1st Street and is identified as part of the High Injury Network south of 1st Street.

- Grand Avenue—Grand Avenue is a Collector Street north of Cesar E. Chavez Avenue, a designated Avenue II between US-101 and Cesar E. Chavez Avenue, a Modified Avenue II between US-101 and Temple Street, and a Modified Boulevard II south of Temple Street. The street travels in the north-south direction and is located approximately 0.5 mile southeast of the Project Site. It generally provides four travel lanes, two in each direction, with left- and/or right-turn lanes at intersections. On-street parking is generally available along Grand Avenue north of Cesar E. Chavez Avenue. Grand Avenue is part of the Pedestrian Enhanced District.
- Freeways—Primary regional access to the Project Study Area is provided by the Hollywood Freeway (US-101) and the Arroyo Seco Parkway (SR-110). US-101 generally runs in the northwest-southeast direction within the Study Area and is located approximately 600 feet southwest of the Project Site. In the vicinity of the Study Area, US-101 provides four travel lanes in each direction with various auxiliary lanes. Access to and from US-101 is available via interchanges at Alvarado Avenue, Glendale Boulevard/Echo Park Avenue, Hope Street/Grand Avenue, and Broadway. SR-110 generally runs in the northeast-southwest direction within the Study Area and is located approximately 500 feet southeast of the Project Site. In the vicinity of the Study Area, SR-110 provides three travel lanes in each direction along with various auxiliary lanes. Access to and from SR-110 is available via interchanges at Hill Street/Stadium Way, Sunset Boulevard/Alpine Street, 3rd Street/4th Street, and 5th Street/6th Street.

Figure IV.L-1 and Figure IV.L-2 on pages IV.L-12 and IV.L-13 identify the roadway designations and modal priorities, respectively, of streets within the Study Area based on the Mobility Plan.

(b) Public Transit Service

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

- Metro Local 2—Route 2 is a local line that travels from downtown Los Angeles to Pacific Palisades via Sunset Boulevard, with average headways of 27 to 34 minutes during the weekday morning peak hours and 20 to 34 minutes during the afternoon peak hour. It provides service to Hollywood, Beverly Hills, and Brentwood. This line travels along Sunset Boulevard and Cesar E. Chavez Avenue in the vicinity of the Project Site and stops at Beaudry Avenue adjacent to the Project Site.

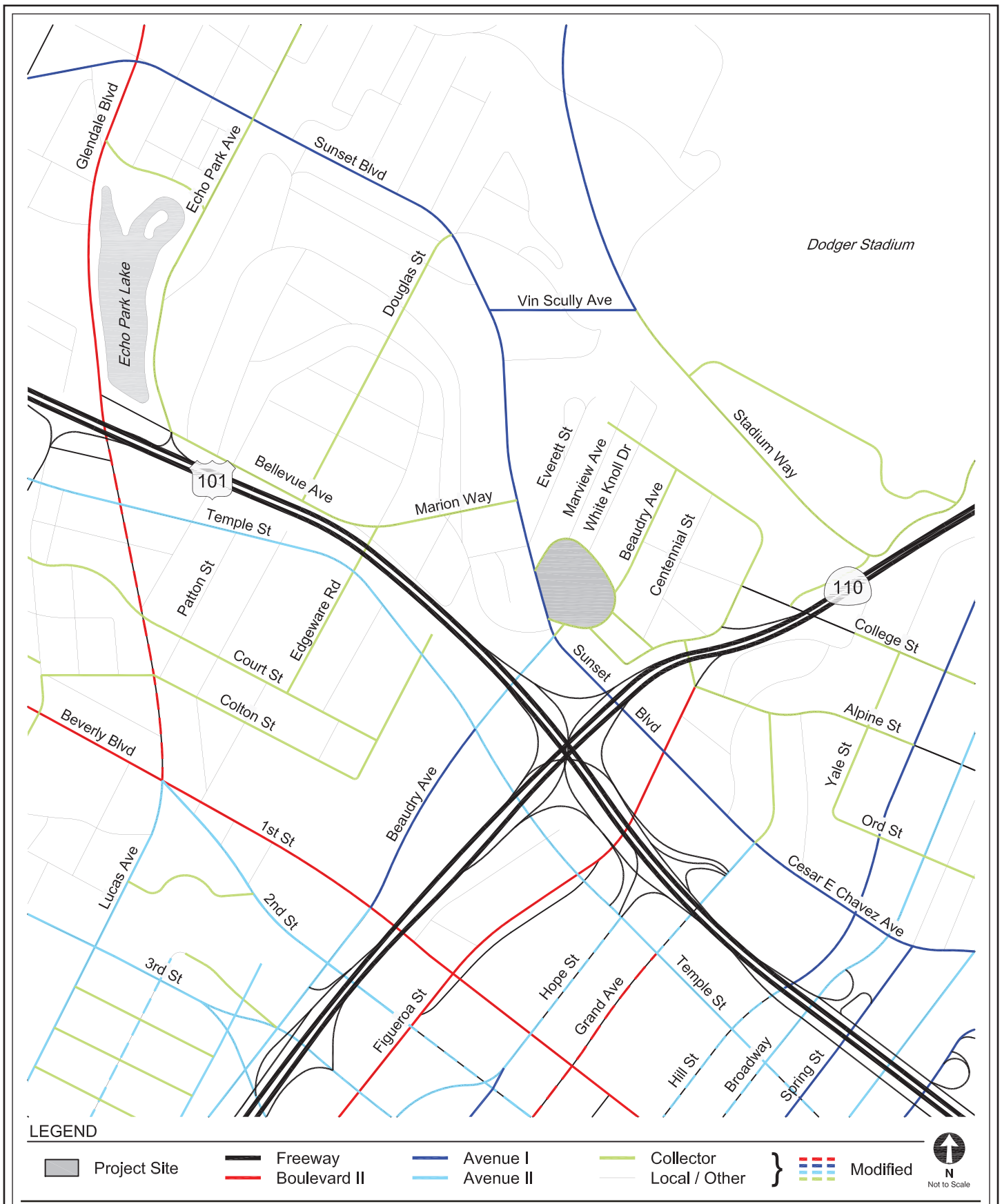
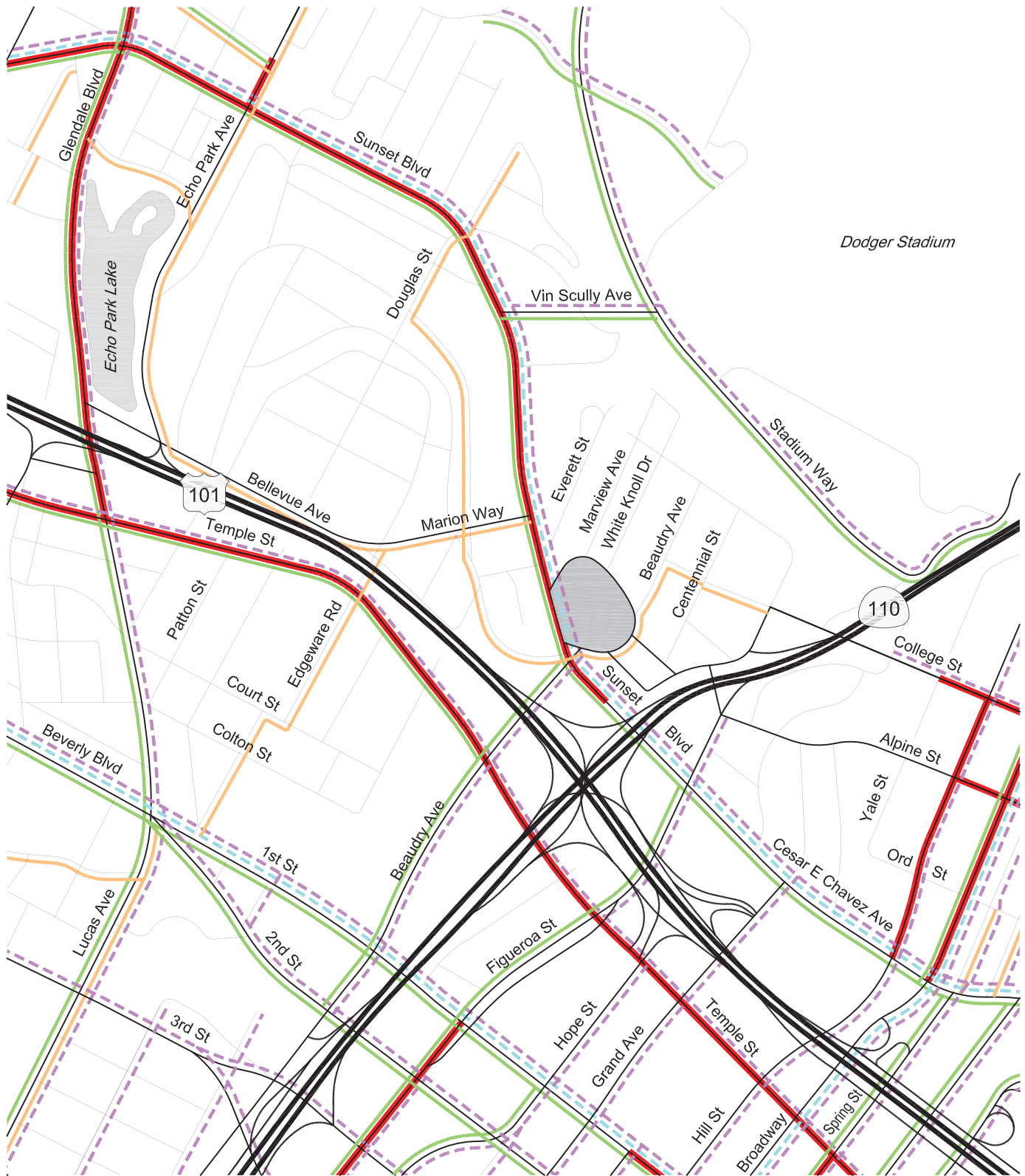


Figure IV.L-1
Roadway Designations in Study Area



LEGEND

- | | | |
|---|--|---|
|  Project Site |  Bicycle Networks |  Neighborhood Enhanced Network |
|  High-Injury Network |  Transit-Enhanced Network |  Pedestrian Enhanced Network |



Figure IV.L-2
Modal Priorities in Study Area

- Metro Local 4—Route 4 is a local line that travels from downtown Los Angeles to West Los Angeles via Santa Monica Boulevard and Sunset Boulevard, with average headways of 10 to 13 minutes during the weekday morning and afternoon peak hours. It provides service to Dodger Stadium, Echo Park, and West Hollywood. This line travels along Sunset Boulevard in the vicinity of the Project Site and stops at Beaudry Avenue adjacent to the Project Site.
- Metro Local 10—Route 10 is a local line that travels from downtown Los Angeles to West Hollywood via Temple Street, with average headways of 10 to 12 minutes during the weekday morning and afternoon peak hours. This line provides service to Hollywood and travels along Temple Street near the Project Site.
- Metro Local 48—Route 48 is a local line that travels from downtown Los Angeles to Willowbrook via San Pedro Street, with average headways of 10 to 15 minutes during the weekday morning and afternoon peak hours. This line provides service to South Los Angeles and travels along Temple Street near the Project Site.
- Metro Local 55—Route 55 is a local line that travels from downtown Los Angeles to the Metro Willowbrook Station via Compton Avenue, with average headways of 16 to 18 minutes during the weekday morning and afternoon peak hours. It provides service to the Martin Luther King, Jr. Transit Center/Metro Blue Line Compton Station, Watts, and the Metro Blue Line Grand Station and travels along Sunset Boulevard and Cesar E. Chavez Avenue in the vicinity of the Project Site.
- Metro Local 92—Route 92 is a local line that travels from downtown Los Angeles to Sylmar via Glenoaks Boulevard, with average headways of 27 minutes during the weekday morning and afternoon peak hours. It provides service to Echo Park, Silver Lake, downtown Burbank, Sun Valley, and San Fernando. This line travels along Temple Street in the vicinity of the Project Site.
- Metro Limited 302—Route 302 is a limited service line that travels from downtown Los Angeles to Pacific Palisades via Sunset Boulevard. It travels west in the morning, with average headways of nine minutes during the peak hour. It travels east in the afternoon with average headways of 14 minutes during the peak hour. This line provides service to Hollywood, West Hollywood, and Westwood and travels along Sunset Boulevard adjacent to the Project Site. It stops at Beaudry Avenue adjacent to the Project Site.
- Metro Limited 355—Route 355 is a limited service line that travels from downtown Los Angeles to the Metro Willowbrook Station via Compton Avenue, with average headways of 15 minutes in the northbound/eastbound direction during the weekday morning peak hour and 18 minutes in the southbound/westbound direction during the afternoon peak hour. It provides service to the Martin Luther King, Jr. Transit Center/Metro Blue Line Compton Station, Watts,

and the Metro Blue Line Grand Station and travels along Sunset Boulevard and Cesar E. Chavez Avenue in the vicinity of the Project Site.

- Metro Rapid 704—Route 704 is a rapid line that travels from downtown Los Angeles to Santa Monica via Santa Monica Boulevard, with average headways of 11 to 16 minutes during the weekday morning and afternoon peak hours. It provides service to West Hollywood, Beverly Hills, Century City, Westwood, and West Los Angeles. This line travels along Sunset Boulevard and Cesar E. Chavez Avenue in the vicinity of the Project Site. The nearest stop is at Figueroa Street & Sunset Boulevard/Cesar E. Chavez Avenue, approximately 0.25 mile southeast of the Project Site.
- DASH Lincoln Heights/Chinatown—The Lincoln Heights/Chinatown Route is a local line that circulates from Lincoln Heights to Chinatown, with average headways of 30 minutes during the weekday morning and afternoon peak hours. It travels along Cesar E. Chavez Avenue, Figueroa Street, and College Street in the vicinity of the Project Site and provides a stop at Centennial Street & Alpine Street, approximately 300 feet south east of the Project Site.
- DASH Pico Union/Echo Park—The Pico Union/Echo Park Route is a local line that circulates from Pico Union to Echo Park with average headways of 10 to 12 minutes during the weekday morning and afternoon peak hours. It travels along Figueroa Street in the vicinity of the Project Site.

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.

Metro also offers the Dodger Stadium Express, a special event bus service that transports fans to and from Dodgers games. Both Dodger Stadium Express routes (one from Union Station and one from the South Bay) pass the Project Site in a designated Bus Only Lane on Sunset Boulevard.

(2) Existing Parking and Site Access

The Project Site includes surface parking and circulation areas generally located on the eastern half of the Project Site. Vehicular access to the Project Site is available at driveways along White Knoll Drive and Alpine Street.

(3) Existing Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

The sidewalks that serve as routes to the Project Site provide proper connectivity to pedestrian crossings at intersections and adequate widths for a comfortable and safe pedestrian environment. Nearly all of the signalized intersections in the Project vicinity provide pedestrian phasing, crosswalk striping, and Americans with Disabilities Act wheelchair ramps.

(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 from parked cars to prevent collisions, makes motorists aware of bicycles potentially in the travel lane, and shows bicyclists the correct direction of travel. The following bicycle facilities, all of which are bicycle lanes (Class II), are provided along corridors within the Project vicinity:

- 1st Street east of Beaudry Avenue
- 2nd Street west of Spring Street
- Stadium Way west of Chavez Ravine Place
- Sunset Boulevard northwest of Vin Scully Avenue
- Montana Street between Alvarado Street and Echo Park Avenue
- Union Avenue between Beverly Boulevard and Temple Street
- Figueroa Street south of Cesar E. Chavez Avenue
- Spring Street south of Cesar E. Chavez Avenue
- Main Street south of Cesar E. Chavez Avenue
- Los Angeles Street south of Cesar E. Chavez Avenue

c. Future Without Project Conditions

The Project is expected to be completed by year 2024 under the most expeditious schedule but may not be fully completed until year 2028. The Transportation Analysis assumes the completion of construction in year 2028. During this period, traffic conditions in the Study Area would be affected by other development projects and transportation infrastructure improvements. A list of other Related Projects was prepared based on information provided by LADCP and LADOT, as well as recent studies of projects in the area. The Related Projects are detailed in Section III, Environmental Setting, of this Draft EIR, along with their vehicular trip generation estimates.¹⁶ These related projects are projects located within a 1.5-mile radius of the Site. Although the buildout years of many of these related projects are uncertain and may well be beyond the Project's buildout year, notwithstanding that some may not be approved or developed, all related projects were considered. Therefore, the projected traffic growth as a result of the related projects is a conservative estimate.

The transportation network within the Study Area could also be affected by regional improvement plans, local specific plans, and programmed improvements implemented prior to completion of the Project. The potential changes are discussed below.

- Metro Regional Connector—The Metro Regional Connector project is a 1.9-mile underground light rail system that will extend from Little Tokyo to the 7th Street/Metro Center Station, allowing passengers to make direct transfers between the L Line (formerly Gold Line), A Line (formerly Blue Line), and E Line (formerly Expo Line) light rail trains. The Metro Regional Connector will improve access to both local and regional destinations by providing continuous service between these lines and providing connectors to other rail lines via the 7th Street/Metro Center Station. Three new transit stations will be developed with the operation of the Metro Regional Connector, including the Grand Avenue Arts/Bunker Hill Station at Hope Street & 2nd Place approximately 0.7 mile south of the Project Site. The Metro Regional Connector is anticipated to be complete and in operation by 2021. The Metro Regional Connector will be underground, and will not affect the configurations of the corridors in the Study Area.
- City Bicycle Plan—*2010 Bicycle Plan, A Component of the City of Los Angeles Transportation Element* (LADCP, adopted March 1, 2011) identifies the City's vision for a more integrated bicycle network throughout the City, including within the Study Area. It proposes bicycle lanes on Glendale Boulevard, Stadium Way,

¹⁶ Cumulative growth in the greater Project area through 2028 is anticipated by the City and will be incorporated into the Central City North Community Plan update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing, as well as general ambient growth, as described in Section III, Environmental Setting, of this Draft EIR.

Beaudry Avenue north of 1st Street, Figueroa Street, Flower Street, Sunset Boulevard, Cesar E. Chavez Avenue, Temple Street west of Beaudry Avenue, Marion Street, Beverly Boulevard, 1st Street, and 2nd Street. It also proposes “bicycle friendly streets” (which would include traffic calming enhancements and other bicycle-friendly features) on various neighborhood streets in the Study Area, including Echo Park Avenue, Bellevue Avenue south of Marion Street, Kensington Road, Beaudry Avenue north of Sunset Boulevard, and Edgeware Road. There is currently no schedule for implementation of these bicycle lanes. Upon consultation with LADOT’s bicycle section, no changes to vehicular lane configurations as a result of potential new bicycle lanes were assumed in this analysis.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G and the TAG, the Project would have a significant impact related to transportation/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; or

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

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

Threshold (d): Result in inadequate emergency access.

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018 and were subsequently adopted by the City of Los Angeles (City) on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines Update*, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The *CEQA Transportation Analysis Guidelines Update* establishes VMT as the City’s formal method of evaluating a project’s transportation impacts. In conjunction with this

update, LADOT adopted its TAG. The analysis in this section and the Transportation Assessment, included as Appendix Q.1 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 will evaluate the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. In accordance with the TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent.

(3) Vehicle Miles Traveled

(a) *VMT Impact Thresholds*

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds. 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's located.

Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT. The TAG identifies a daily household VMT per capita impact threshold of 7.2 and a daily work VMT per employee impact threshold of 12.7 for the East Los Angeles APC (East LA APC) area, in which the Project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 7.2 and average work VMT per employee be equal to or lower than 12.7, the Project's overall VMT impact would be less than significant.

It is important to note that 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 at the Project Site
- Home-Based Other Production: trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use at the Project Site
- Home-Based Work Attraction: trips to a workplace destination at the Project Site originating from a residential use

The location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of *Technical Advisory on Evaluating Transportation Impacts in CEQA* (California Governor's Office of Planning and Research, December 2018). Therefore, as detailed in *City of Los Angeles VMT Calculator Documentation* (LADOT and LADCP, February 2019) (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.

Other types of trips generated by the Project, including Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use at the Project Site), Home-Based Other Attraction (trips to a non-workplace destination at the Project Site originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination at the Project Site 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.

(b) VMT Analysis Methodology

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

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

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

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

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

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

The VMT Calculator determines a Project's VMT based on trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the

traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the Project's VMT.

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

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

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

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

(4) Hazardous Geometric Design Features

The TAG include a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle and pedestrian safety impacts, project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]) are reviewed. Where project driveways would cross pedestrian

facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result are considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. Using this methodology, the Project design, including proposed infrastructure improvements, land uses, and open spaces, are reviewed to determine if the Project would increase and/or create a hazardous geometric design feature(s) and/or incompatible use.

(5) Emergency Access

In consultation with LAFD, the analysis of the Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination was made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project 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 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 were met:

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

If a potential safety issue is identified, then, to offset this potential 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 the ramp would have to demonstrate substantial safety benefits, not be a VMT inducing improvement, and not result in environmental issues.

c. Project Design Features

As discussed in Section II, Project Description, of this Draft EIR, state law allows for a reduction in required parking for residents as part of a density bonus for providing affordable housing and a reduction in spaces for commercial uses as a result of being located within a State Enterprise Zone. The Project's parking requirement was calculated before AB 1245 amended AB 744. Although the Project's required parking could be further reduced based on AB 1245, given other factors, including market demand and to ensure no spill over of parking into the surrounding neighborhood, the Applicant is not proposing to further reduce the parking spaces provided.

A reduced parking supply makes parking less available and more expensive and, therefore, encourages the use of non-automobile modes to and from the Project Site and reduces VMT. The bicycle parking provided by the Project in accordance with the LAMC would also reduce VMT. These project features included in Section II. Project Description were incorporated into the VMT Calculator results for the Project.

The Project would also include the project design features set forth below related to construction and operation. The operational project design features set forth in Project Design Feature TR-PDF-2 below are not included in the VMT impact analysis calculations presented herein as they are not required to reduce significant transportation impacts of 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 Q.1 of this Draft EIR.

Project Design Feature TR-PDF-1: A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction 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:

- Scheduling workdays to begin and end prior to the morning and afternoon peak hours, respectively, to the extent feasible so as to avoid worker trips during those peak hours.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent

feasible, to reduce the effect on traffic flow on surrounding streets.

- Planning and scheduling of construction activities so as to minimize the duration of sidewalk and lane closures on Sunset Boulevard.
- Provision of worker parking on-site or in designated off-site private parking areas and prohibition of construction-related vehicle parking on surrounding public streets, other than the streets adjacent to the Project Site.
- Provision of replacement parking for neighboring residents to make up for on-street parking temporarily lost during Project construction.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men) and to maintain access for land uses in the vicinity of the Project Site.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools.

Project Design Feature TR-PDF-2: The Project shall include the following TDM measures to further reduce VMT:

- Unbundled Parking/Parking Cash-Out: The Project would provide unbundling parking, which requires residents and tenants to specifically opt-in to a parking lease (unbundled parking) and requires companies to refund the cost of parking to employees who opt-out (parking cash-out).
- Promotions and Marketing: The Project shall include a transportation management coordinator (TMC) on the building management staff to promote the benefits of TDM. The TMC will 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.
- Ride-Share Program: The Project shall participate in the Downtown Transportation Management Organization (TMO), which would help to match employees with similar commutes into ride-share programs.
- First-Mile/Last-Mile Options: The Transportation Center at the Project Site shall support services that address first-mile/last-mile connectivity issues with public transit.

- **Pedestrian Network Improvements:** The Project shall widen sidewalks on all sides of the Project Site to meet Mobility Plan standards. The Project shall install a new pedestrian crosswalk with continental crosswalk markings across Sunset Boulevard at White Knoll Drive with the installation of a traffic signal at that location. The Project shall also install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. As such, the following analysis accounts for both development scenarios and the term “Project” is used unless stated otherwise.

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

(1) Impact Analysis

Table 2.1-2 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: Mobility Plan; Plan for a Healthy Los Angeles; the LAMC; Vision Zero; and Citywide Design Guidelines. The Project’s potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

(a) Mobility Plan

As discussed above, the Mobility Plan combines “complete street” principles with the following five goals that define the City’s mobility priorities:

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

A detailed analysis of the Project’s consistency with the policies in the Mobility Plan is provided in Table IV.L-1 on page IV.L-28. In summary, the Project is conceived as a pedestrian- and transit-oriented development that emphasizes accessibility by all travel modes. The Project’s Transportation Center, to be located near pedestrian access, would support multi-modal mobility options such as bicycle and scooter sharing services. The Project would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue and an off-street pick-up/drop-off area at the Sunset Building near the corner of Beaudry Avenue and Sunset Boulevard. It would provide a new signalized pedestrian crossing point with continental crosswalks on Sunset Boulevard at White Knoll Drive, install all-way stop-control at the existing crosswalk across Beaudry Avenue at Alpine Street, and widen the sidewalks adjacent to the Project Site.

The Project's mix of high-density residential uses, office space, hotel (under the Mixed Use Development Scenario) and commercial uses located in close proximity to downtown Los Angeles and Union Station (approximately 1.2 miles) would encourage ridesharing and the use of alternative mobility modes. Additionally, the Project's TDM program and participation in the Downtown TMO would further reduce vehicle trips. The Downtown TMO is an organization that seeks to provide TDM services and programs for Downtown Los Angeles and its immediate surroundings, including the Project Site and Study Area. The Project also has convenient bus access to Union Station, the largest transit hub in Southern California. The Project, under both development scenarios, is estimated to generate lower VMT per capita for residents and employees than the average for the area, as demonstrated in the analysis further below.

The Project would also provide sufficient off-street parking to accommodate the Project’s parking demand under either the Mixed Use Development Scenario or the No-Hotel Development Scenario. Additionally, the mix of land uses with a contiguous parking supply will allow for flexibility to accommodate peak demands of various uses at

**Table IV.L-1
Project Consistency With Mobility Plan 2035**

Objective, Policy, Program, or Plan	Analysis of Project Consistency
Chapter 1: Safety First	
<u>Policy 1.1 Roadway User Vulnerability</u> Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.	Consistent. The Project is conceived as a pedestrian- and transit-oriented development. As such, it would provide a Transportation Center near pedestrian access to support multi-modal mobility options such as bicycle and scooter sharing services. It would widen the sidewalks on all sides of the Project Site. It also would provide a new signalized pedestrian crossing point with continental crosswalks on Sunset Boulevard at White Knoll Drive and all-way stop-control at the existing crosswalk on Beaudry Avenue at Alpine Street. It would also provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue.
Chapter 2: World Class Infrastructure	
<u>Policy 2.3 Pedestrian Infrastructure</u> Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	Consistent. The Project is conceived as a pedestrian- and transit-oriented development. The Project Site is designed to allow easy pedestrian access between Project land uses and between buildings with lighted and landscaped walkways. Beyond the Project Site, it would widen the sidewalks on all sides of the Site. It also would provide a new signalized pedestrian crossing point with continental crosswalks on Sunset Boulevard at White Knoll Drive (Sunset Boulevard is designated as part of the pedestrian-enhanced district under the Mobility Plan) and all-way stop-control at the existing crosswalk on Beaudry Avenue at Alpine Street. It would also provide a Transportation Center near pedestrian access to support multi-modal mobility options such as bicycle and scooter sharing services and would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue.
<u>Policy 2.4 Neighborhood Enhanced Network</u> Provide a slow speed network of locally serving streets.	Consistent. Beaudry Avenue is part of the neighborhood-enhanced network adjacent to the Project Site. Beaudry Avenue would provide local access to residents of the Project Site. Primary access to the Project's commercial uses would be from Sunset Boulevard, thereby ensuring that most Project traffic on Beaudry Avenue would be by residents. Additionally, all-way stop-control would be installed on Beaudry Avenue at Alpine Street, slowing traffic, and a new signal would be installed on Sunset Boulevard at White Knoll Drive, which would help to draw some neighborhood traffic to White Knoll Drive rather than Beaudry Avenue for neighborhood access. The Project frontage would also be lined with street trees which alert drivers to the neighborhood character of the street and help to encourage slower speeds.
<u>Policy 2.5 Transit Network</u> Improve the performance and reliability of	Consistent. Sunset Boulevard is part of the transit enhanced network. The Project would encourage more transit usage by developing a major mixed use project with

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

Objective, Policy, Program, or Plan	Analysis of Project Consistency
existing and future bus service.	convenient bus access to Union Station, the largest transit hub in Southern California. The Project would not directly affect any existing transit stops, as there are none adjacent to Project Site frontage.
<u>Policy 2.6 Bicycle Networks</u> Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities. (includes scooters, skateboards, rollerblades, etc.)	Consistent. Mobility Plan 2035 designates Sunset Boulevard as a candidate for Tier 1 protected bicycle lanes. The Project would provide infrastructure and services to encourage bicycling for residents, employees, and visitors to the Project Site. There would be 436 bicycle parking spaces under the Mixed Use Development Scenario and 421 bicycle parking spaces under the No-Hotel Development Scenario provided in nine dedicated areas throughout the parking levels of the Project Site. Each of the six long-term bicycle parking areas would provide a bicycle maintenance area. There would also be a dedicated bicycle locker and shower station near the Transportation Center. The Transportation Center would also provide space for bicycle rentals, scooter rentals, and other similar services that may be available in the future.
<u>Policy 2.10 Loading Areas</u> Facilitate the provision of adequate on and off- street loading areas.	Consistent. The Project would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue and an off-street pick-up / drop-off area in front of the Sunset Building with direct access to the Project's parking structure. Commercial loading would be provided internal to the Project Site, with loading access from Sunset Boulevard and Alpine Street. Together, these would be sufficient to meet the Project Site needs for loading.
Chapter 3: Access for All Angelenos	
<u>Policy 3.1 Access for All</u> Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	Consistent. The Project is conceived as a pedestrian- and transit-oriented development. As such, it would widen the sidewalks on all sides of the Project Site. It also would provide a new signalized pedestrian crossing point with continental crosswalks on Sunset Boulevard at White Knoll Drive and all-way stop-control at the existing crosswalk on Beaudry Avenue at Alpine Street. It would also provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue. The Project would provide infrastructure (secure bicycle parking, easy bicycle accessibility to the Project Site) and services (such as bicycle and scooter sharing services at the Transportation Center) to encourage alternative mobility for residents, employees, and visitors to the Project Site. The Project would encourage more transit usage by developing a major mixed use project with convenient bus access to Union Station , the largest transit hub in southern California. Finally, the Project would support those residents,

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

Objective, Policy, Program, or Plan	Analysis of Project Consistency
	employees, and visitors who choose to travel by automobile through the provision of six access points around the Project Site, several areas for curbside and on-site passenger loading and commercial loading, and adequate parking supply to serve demand.
<u>Policy 3.2 People with Disabilities</u> Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	Consistent. The Project would be designed consistent with all requirements from the Americans with Disabilities Act. All street crossings adjacent to the Project Site, including those installed by the Project, would feature wheelchair-accessible curb cuts.
<u>Policy 3.3 Land Use Access and Mix</u> Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	Consistent. The Project's mix of high-density residential uses, office space, hotel (under the Mixed- Use Development Scenario) and commercial uses located in close proximity to downtown Los Angeles and Union Station would encourage ridesharing and use of alternative mobility modes. Additionally, the Project's TDM program and participation in the Downtown TMO will further reduce vehicle trips.
<u>Policy 3.5 Multi-Modal Features</u> Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	Consistent. The Project would provide space for first-mile/last-mile solutions within the Transportation Center, such as bicycle rentals, scooter rentals, and other similar services that may be available in the future. Additionally, the Project's TDM program and participation in the Downtown TMO will encourage the use of transit and other alternative modes of transportation.
<u>Policy 3.6 Regional Transportation & Union Station</u> Continue to promote Union Station as the major regional transportation hub linking Amtrak, Metrolink, Metro Rail, and high-speed rail service.	Consistent. The Project Site is directly connected by bus to Union Station, located less than 1 mile southeast on Sunset Boulevard / Cesar E. Chavez Avenue.
<u>Policy 3.7 Regional Transit Connections</u> Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.	Consistent. As described in response to Policy 3.5 above, the Project's Transportation Center would provide space for first-mile/last-mile solutions such as bicycle rentals, scooter rentals, and other similar services that may be available in the future that would improve access to transit, including alternative access to Union Station, the largest transit hub in southern California.
<u>Policy 3.8 Bicycle Parking</u> Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	Consistent. The Project would provide convenient and secure long-term and short-term parking for bicycles in accordance with LAMC bicycle parking requirements. There would be 436 bicycle parking spaces under the Mixed Use Development Scenario and 421 bicycle parking spaces under the No-Hotel Development Scenario provided in nine dedicated areas throughout the parking levels of the Project Site. Each of the six long-term bicycle parking areas would

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

Objective, Policy, Program, or Plan	Analysis of Project Consistency
	provide a bicycle maintenance area. There would also be a dedicated bicycle locker and shower station near the Transportation Center. The Transportation Center would also provide space for bicycle rentals, scooter rentals, and other similar services that may be available in the future.
Chapter 4: Collaboration, Communication, & Informed Choices	
<u>Policy 4.1 New Technologies</u> Support new technology systems and infrastructure to expand access to transportation choices.	Consistent. The Project's TDM program and participation in the Downtown TMO, described in Chapter 5 of the Transportation Analysis, would support the latest improvements in first-mile/last-mile transportation solutions to be located at the Transportation Center, such as bicycle rentals, scooter rentals, and other similar services that may be available in the future.
<u>Policy 4.7 Performance Evaluation</u> Evaluate performance of new transportation strategies through the collection and analysis of data.	Consistent. The Project would comply with reasonable requests by LADOT to monitor the performance of the Project's TDM program.
<u>Policy 4.8 Transportation Demand Management Strategies</u> Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	Consistent. The Project's TDM program, described in Chapter 5 of the Transportation Analysis, includes the following measures: • Reduced parking supply • Provide short-term and long-term bicycle parking • Pedestrian network improvements • Unbundled parking and parking cash-out • TDM promotions and marketing • Ride-share program support • First-Mile/Last-Mile Options
<u>Policy 4.13 Parking and Land Use Management</u> Balance on-street and off-street parking supply with other transportation and land use objectives.	Consistent. The Project would provide sufficient off-street parking to accommodate Project parking demand under either the Mixed Use Development Scenario or the No-Hotel Development Scenario. Additionally, the mix of land uses with a contiguous parking supply would allow for flexibility to accommodate peak demands of various uses at various times. The Project would also construct the Elysian Parking Facility to serve the Elysian apartment building and reduce resident dependence on on-street parking. However, the Project would retain the existing on-street parking around Project frontage, other than where driveways or curb loading areas are proposed.
Chapter 5: Clean Environments & Healthy Communities	
<u>Policy 5.1 Sustainable Transportation</u> Encourage the development of a sustainable transportation system that	Consistent. The Project would encourage sustainable transportation through the infrastructure and services provided at the Transportation Center such as transit information and rentals of first-mile/last-mile solutions such

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

Objective, Policy, Program, or Plan	Analysis of Project Consistency
promotes environmental and public health.	as bicycles, scooters, and other similar services that may be available in the future.
<u>Policy 5.2 Vehicle Miles Traveled (VMT)</u> Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent. The Project, under both development scenarios, is estimated to generate lower VMT per capita for residents and employees than the average for the area, as demonstrated in Chapter 5 of the Transportation Analysis. Further, the Project would implement a TDM program and participate in the Downtown TMO to further reduce VMT per capita.
^a Objectives, Policies, Programs, or Plans based on information provided in <i>Mobility Plan 2035: An Element of the General Plan</i> (Los Angeles Department of City Planning, January 2016). Source: Gibson Transportation, October 2020.	

various times. The Project would also retain the existing on-street parking around Project frontage, other than where driveways or curb loading areas are proposed.

The Mobility Plan also designates street and sidewalk width standards based on a street's functional classification. LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right-of-way standards consistent with the Mobility Plan. Around the Project Site, Sunset Boulevard is an Avenue I requiring a 50-foot half-ROW (including 15-foot sidewalks) and White Knoll Drive, Alpine Street, and Beaudry Avenue are Collectors requiring a 33-foot half-ROW (including 13-foot sidewalks). The paved widths of all of the four streets surrounding the Project Site half right of way already exceed the Mobility Plan requirements; however, the sidewalks adjacent to the Project Site are all narrower than those required by the Mobility Plan. In order to avoid disturbing existing streets, and in compliance with a request from the City Bureau of Engineering, the Applicant proposes to widen the sidewalks adjacent to the Project Site to 15 feet along Sunset Boulevard (3 feet wider than existing) and 13 feet along White Knoll Drive, Alpine Street, and Beaudry Avenue (5 feet wider than existing on each street) and grant an easement to the City for public access. However, there are existing improvements and easement rights related the Elysian Apartment building that prevent the full sidewalk width to be provided around the entire Project Site. Additionally, the Applicant seeks a property line modification at the north corner of Beaudry Avenue & Sunset Boulevard to relocate the existing right-turn lane adjacent to the through lane. With these sidewalk widenings, all of the sidewalks and streets adjacent to the Project Site would meet or exceed the widths required by the Mobility Plan.

The above discussion highlights Project characteristics that specifically support policies in the Mobility Plan, as detailed in Table IV.L-1 on page IV.L-28. Additionally, the Project does not hinder other goals and policies identified in the Mobility Plan. Therefore, the Project is consistent with and would not obstruct the implementation of the Mobility Plan.

(b) Plan for a Healthy Los Angeles

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table IV.L-2 on page IV.L-34. In summary, the Project would promote healthy living as a pedestrian- and transit-oriented mixed use development where active travel modes are encouraged. Within the Project Site, it would provide lighted and landscaped pedestrian walkways and substantial amounts of open space both for Project residents and neighboring residents. Specifically, as discussed in Section II, Project Description, of this Draft EIR, the Mixed Use Development Scenario would provide a total of 82,925 square feet of common open space and the No-Hotel Development Scenario would provide a total of 93,050 square feet of open space, pursuant to the requirements of the LAMC. The Project would provide common open space at the ground level that could be publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. The primary open space amenity, under both development scenarios, would be a 20,925-square-foot courtyard (referred to as The Hill) that would be located at the center of the Project Site and would include active and passive recreation spaces such as family play features and a lawn with lounge furniture and views to the Downtown skyline. Beyond the Project Site, it would provide dedicated curb-side passenger loading areas and an off-street pick-up/drop-off area in front of the Sunset Building. The Transportation Center would provide multi-modal mobility options such as bicycle and scooter sharing services to help improve the convenience of making trips without the use of a personal automobile. The Project would provide a new signalized pedestrian crosswalk across Sunset Boulevard at White Knoll Drive, install all-way stop-control at the existing crosswalk on Beaudry Avenue at Alpine Street, and widen the sidewalks adjacent to the Project Site.

The Project would also provide up to 76 affordable housing units and would provide employment and entrepreneurial opportunities through the retail, restaurant, and office space at the Project Site. The commercial uses assumed in this analysis include a grocery store and health club/gym/spa, both easily accessed by foot from surrounding residential neighborhoods. Finally, the Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as demonstrated in the analysis further below. Further, it would implement a TDM program and participate in the Downtown TMO to further reduce VMT per capita. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.

**Table IV.L-2
Project Consistency With Plan for a Healthy Los Angeles**

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
Chapter 1: Los Angeles, a Leader in Health and Equity	
<u>Policy 1.5 Plan for Health</u> 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.	Consistent. The Project is conceived as a pedestrian- and transit- oriented development. The Project Site is designed to allow easy pedestrian access between Project land uses and between buildings with lighted and landscaped walkways. It would also provide substantial amounts of open space which would be available both to Project residents as well as neighboring residents. Beyond the Project Site, it would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue and an off-street pick-up/drop-off area at the Sunset Building at the corner of Beaudry Avenue & Sunset Boulevard. It would widen the sidewalks on all sides of the Project Site. It also would provide a new signalized pedestrian crossing point with continental crosswalks on Sunset Boulevard at White Knoll Drive and all-way stop-control at the existing crosswalk on Beaudry Avenue at Alpine Street. The Transportation Center would support multi-modal mobility options such as bicycle and scooter sharing services. As such, it would encourage the use of active travel modes and thereby promote healthy living. Additionally, the Project anticipates that up to approximately 14,500 square feet of commercial space would be occupied by a health club/gym/spa and provides numerous opportunities for activities in the Project's open space (including 82,925 square feet under the Mixed Use Development Scenario and 93,050 square feet under the No-Hotel Development Scenario).
<u>Policy 1.6 Poverty and Health</u> Reduce the debilitating impact that poverty has on individual, familial, and community health and well-being by: promoting cross-cutting efforts and partnerships to increase access to income; safe, healthy, and stable affordable housing options; and attainable opportunities for social mobility.	Consistent. The Project would include up to 76 affordable housing units. Also, the Project's 95,000 square feet of retail and restaurant space along with 48,000 square feet of office space would provide employment and entrepreneurial opportunities.
<u>Policy 1.7 Displacement and Health</u> 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;	Consistent. In addition to up to 76 affordable housing units provided by the Project, it would provide employment and entrepreneurial opportunities through its provision of up to 95,000 square feet of retail and restaurant space and 48,000 square feet of office space. The Project would not displace any existing housing; rather, it would convert a substantial amount of underutilized land into an active and vibrant mixed use community.

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

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.	
Chapter 2—A City Built for Health	
<u>Policy 2.1 Access to Goods and Services</u> 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.	Consistent. The Project would provide up to 95,000 square feet of retail and restaurant space which could include a grocery store and health club / gym / spa, easily accessed by foot from surrounding residential neighborhoods.
<u>Policy 2.8 Basic Amenities</u> Promote increased access to basic amenities, which include public restrooms and free drinking water in public spaces, to support active living and access to health-promoting resources.	Consistent. The Project would provide substantial amounts of open space (including 82,925 square feet under the Mixed Use Development Scenario and 93,050 square feet under the No-Hotel Development Scenario) to support active living. Publicly accessible drinking fountains would be provided.
Chapter 5—An Environment Where Life Thrives	
<u>Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction</u> 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.	Consistent. The Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as demonstrated in Chapter 5 of the Transportation Analysis. Further, it would implement a TDM program and participate in the Downtown TMO, also described in Chapter 5 of the Transportation Analysis, 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, October 2020.	

The above discussion highlights Project characteristics that specifically support policies in the Plan for a Healthy Los Angeles, as detailed in Table IV.L-2 on page IV.L-34. The Project prioritizes safety and access for all individuals utilizing the Project Site and does not hinder other goals and policies identified in the Plan for a Healthy Los Angeles. Therefore, the Project is consistent with and would not obstruct the implementation of the policies recommended by the Plan for a Healthy Los Angeles.

(c) LAMC

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. The Mixed Use Development Scenario has a total bicycle parking requirement of 432 spaces (335 long-term and 97 short-term spaces). The No-Hotel Development Scenario has a total bicycle parking requirement of 421 spaces (340 long-term and 81 short-term spaces). The Project would meet the LAMC requirements for on-site bicycle parking supply under either development scenario. Therefore, the Project is consistent with LAMC Section 12.21.A.16.

LAMC Section 12.26J, the TDM Ordinance, establishes TDM requirements for projects with at least 25,000 square feet of non-residential floor area. The Project would incorporate TDM measures as part of the project design aimed at encouraging use of alternative transportation modes in accordance with the requirements set forth in the TDM Ordinance. Specifically, passenger loading would be accommodated at several areas around the Project Site, including curbside on Alpine Street and Beaudry Avenue and off-street in front of the Sunset Building. The Project also provides extensive internal and external pedestrian connectivity. The Transportation Center would provide multi-modal mobility options such as bicycle and scooter sharing services near to pedestrian access. In addition to the requirements of the TDM Ordinance, the Project proposes to implement a comprehensive TDM program that would include the following measures:

- Reduced parking supply
- Unbundled parking and parking cash-out
- TDM promotions and marketing
- Ride-share program
- Bicycle parking
- Pedestrian network improvements
- First-mile/last-mile options

(d) Vision Zero

As discussed above, Sunset Boulevard is included in the High Injury Network (HIN). LADOT maintains a list of active Vision Zero projects on its website. No active Vision Zero projects are proposed along Sunset Boulevard. The nearest such project to the Project Site is the Temple Street Safety Improvements Project, currently under construction on Temple Street between Westmoreland Avenue and Beaudry Avenue. This improvement project reconstructs portions of the street and sidewalk, relocates bus stops, installs

continental crosswalks, and implements roadway striping designed to encourage slower and more careful turning movements, among various signal and signage improvements. The Project would not interfere with implementation of the Vision Zero Action Plan or this corridor improvement plan. Additionally, the Project's design and operation would not interfere with the implementation of any potential improvements along Sunset Boulevard in the future (Sunset Boulevard is identified by Vision Zero as part of the HIN).

(e) Citywide Design Guidelines

As discussed above, the Design Guidelines are organized around three design approaches: pedestrian-first design, 360 degree design, and climate-adapted design. The three guidelines under 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 Design Guidelines, the Project specifically prioritizes the pedestrian experience. Within the Project Site, it would provide lighted and landscaped pedestrian walkways and substantial amounts of open space both for Project residents and neighboring residents. Beyond the Project Site, it would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue and an off-street pick-up/drop-off area in front of the Sunset Building. It also would widen the sidewalks adjacent to the Project Site, provide a new signalized pedestrian crossing point with continental crosswalks on Sunset Boulevard at White Knoll Drive, and install all-way stop-control at the existing crosswalk on Beaudry Avenue at Alpine Street. Additionally, the Project incorporates low-rise commercial and office structures oriented toward Sunset Boulevard and Beaudry Avenue to help encourage pedestrian engagement.

The Project would provide parking in an up to six-level, partially subterranean parking podium under the Project. All Project parking would be located behind or below the level of Project buildings and all parking areas would be hidden or screened from the street. There would be several access points to the parking podium around the Project Site, located in such a way as to minimize interaction between vehicles and pedestrians. The access points would be designed in accordance with City standard plans for driveways and would be subject to LADOT review with the Project Site plan.

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

(f) 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 RTP/SCS policies related to encouraging pedestrian activity and reducing 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.

(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 Analysis, LADOT's VMT Calculator was used to evaluate Project VMT from both development scenarios and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's eight land uses (including affordable housing as a separate category from standard multi-family apartment units and including four types of retail and restaurant uses) and their respective sizes as the primary input.

In addition to analyzing the full Project as a mixed use development, the TAG requires that each component land use of the Project be analyzed individually for potential VMT impacts, accounting for internal trips between uses within the Project. This analysis was also conducted using the VMT Calculator.

Additionally, the analysis included the Project's proposed TDM measures related to reduced parking and provision of bicycle parking. Because the Project would not result in

significant impacts after incorporation of the project design features, no mitigation measures are required. However, as discussed above, the Project would implement an additional operational project design feature that includes TDM measures, such as unbundled parking/parking cash-out, promotions and marketing of the TDM program, a ride share program, first-mile/last-mile options, and pedestrian network improvements. These additional TDM measures were conservatively excluded from the VMT analysis but are included as part of the Project to minimize VMT.

As shown in Table IV.L-3 on page IV.L-40, the Mixed Use Development Scenario is estimated to generate 56,710 total daily VMT prior to incorporation of additional TDM measures. It would produce 8,309 home-based production VMT (used to calculate household VMT per capita) and 4,886 home-based work attraction VMT (used to calculate work VMT per employee). Based on the estimate of 1,728 residents, the Mixed Use Development Scenario would generate average household VMT per capita of 4.8, which is less than the East LA APC impact threshold of 7.2 and, therefore, would not result in a significant VMT impact. Based on the estimate of 582 employees, the Mixed Use Development Scenario would generate average work VMT per employee of 8.4, which is less than the East LA APC impact threshold of 12.7 and, therefore, would also not result in a significant VMT impact. As previously noted, the additional TDM measures would further reduce VMT per capita and VMT per employee. While the effects of those measures are conservatively excluded from this analysis, Appendix A of the Transportation Analysis provides a supplemental analysis of Project VMT including the effects of the additional TDM measures.

As shown in Table IV.L-3, the No-Hotel Development Scenario is estimated to generate 53,035 total daily VMT prior to incorporation of additional TDM measures. It would produce 9,413 home-based production VMT (used to calculate household VMT per capita) and 4,095 home-based work attraction VMT (used to calculate work VMT per employee). Based on the estimate of 1,931 residents, the No-Hotel Development Scenario would generate average household VMT per capita of 4.9, which is less than the East LA APC impact threshold of 7.2 and, therefore, would not result in a significant VMT impact. Based on the estimate of 492 employees, the No-Hotel Development Scenario would generate average work VMT per employee of 8.3, which is less than the East LA APC impact threshold of 12.7 and, therefore, would also not result in a significant VMT impact. As previously noted, the additional TDM measures would further reduce VMT per capita and VMT per employee. While the effects of those measures are conservatively excluded from this analysis, Appendix A of the Transportation Analysis provides a supplemental analysis of Project VMT including the effects of the additional TDM measures.

Based on the above, the Project would not result in significant impacts associated with VMT.

**Table IV.L-3
VMT Analysis Summary**

Land Use Information	Mixed Use Development Scenario	No-Hotel Development Scenario
Multi-Family Housing	661 du	751 du
Affordable Family Housing	76 du	76 du
Hotel	180 rm	
General Office	48,000 sf	48,000 sf
General Retail ^a	18,200 sf	18,200 sf
High-Turnover Sit-Down Restaurant ^a	35,000 sf	35,000 sf
Health Club	14,500 sf	14,500 sf
Grocery Store	27,300 sf	27,300 sf
VMT Analysis^b		
Resident Population	1,728	1,931
Employee Population	582	492
Project Area Planning Commission	East Los Angeles	East Los Angeles
Project Travel Behavior Zone	Compact Infill (Zone 3)	Compact Infill (Zone 3)
Total Daily VMT ^c	56,710	53,035
Home-Based Production VMT ^d	8,309	9,413
Home-Based Work Attraction VMT ^d	4,886	4,095
Household VMT per Capita	4.8	4.9
Impact Threshold	7.2	7.2
Significant Impact	No	No
Work VMT per Employee	8.4	8.3
Impact Threshold	12.7	12.7
Significant Impact	No	No
<i>du = dwelling units</i> <i>rm = rooms</i> <i>sf = square feet</i> ^a Includes 10,000 square feet of [retail/restaurant] space from within the hotel. ^b Project Analysis is from VMT Calculator output reports provided in Appendix A. ^c See Appendix A, Report 1 of the Transportation Analysis. ^d See Appendix A, Report 4 of the Transportation Analysis. Source: Gibson Transportation Consulting, Inc., 2020.		

(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

In accordance with LADOT's TAG, this section addresses potential safety conflicts between vehicles, pedestrians, and bicycles as well as operational delays or capacity reductions resulting from the design or placement of Project access points.

As shown in Figure IV.L-3 on page IV.L-42, the Project Site would have six vehicular access points:

1. Sunset Boulevard, intended to serve commercial and office uses
2. White Knoll Drive, providing access to the Elysian Parking Facility and fire and emergency vehicle access
3. Alpine Street, providing secondary commercial and residential access and primary service access
4. Beaudry Avenue, providing primary residential access
5. Beaudry Avenue, providing inbound access to the Sunset Building pick-up/drop-off area.
6. Sunset Boulevard, providing right-in/right-out access to and from the Sunset Building pick-up/drop-off area

Each access point was reviewed and compared to the guidelines from Section 321 of LADOT's *Manual of Policies and Procedures*. These guidelines include factors such as driveway placement, width, and type.

The final design of the access points would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. Each access point is discussed below.

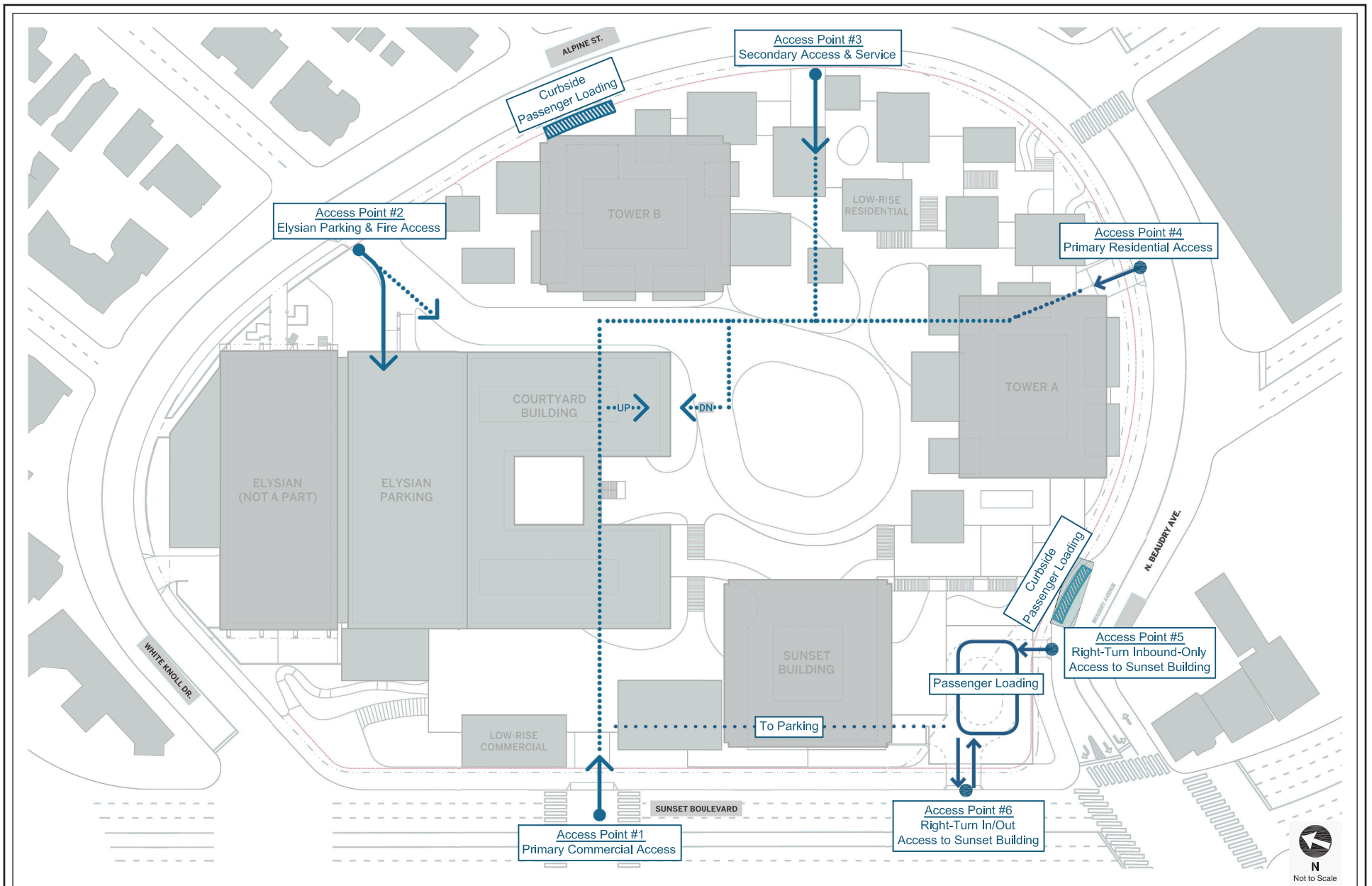


Figure IV.L-3
Vehicular Project Site Access

(a) Access Point #1: Sunset Boulevard

Access Point #1 would be located on Sunset Boulevard between White Knoll Drive and Beaudry Avenue (approximately 400 feet from the signalized intersection of Beaudry Avenue & Sunset Boulevard to the southeast and approximately 200 feet from the intersection of White Knoll Drive & Sunset Boulevard to the northwest, which would be signalized by the Project)). It would serve as a primary access point for the commercial uses, including office, retail, restaurant, grocery store, and fitness center. Because this driveway would be unsignalized, it is anticipated that it will be more heavily used as an inbound driveway than an outbound driveway. Outbound commercial and office trips would also use Access Point #3 to Alpine Street, which leads to signalized intersections on Sunset Boulevard at White Knoll Drive and Beaudry Avenue. LADOT's *Manual of Policies and Procedures* recommends that a driveway should be located on a non-arterial street where possible. The Project has frontage along several non-arterial streets (White Knoll Drive, Alpine Street, and Beaudry Avenue) and, accordingly, proposes access on each. However, with the Project Site's nearly 500 feet of frontage along Sunset Boulevard, the grade differential between the various sides of the Project Site, and the more residential character of the non-arterial streets, the Project proposes Access Point #1 on Sunset Boulevard to serve as a direct vehicular entrance for patrons of the commercial uses and office employees. Not only would this help to preserve the Collector Streets on the other sides of the Project Site for lower-volume residential traffic (including neighborhood traffic), it would help to reduce VMT associated with vehicles circulating the Project Site.¹⁷

Other features of Access Point #1 would be consistent with the LADOT's *Manual of Policies and Procedures*, including its 30-foot width¹⁸ and that all parking control systems (i.e., ticket booths, gate arms) would be located far enough inside the parking structure to avoid potential inbound queuing onto Sunset Boulevard. It would provide one inbound and one outbound lane at the intersection.

(i) Potential Geometric Design Hazards

Sunset Boulevard along the Project Site frontage provides excellent sight distance because it is straight and has a consistent grade (approximately 3 percent). In order to further improve sight distance, the Project-adjacent curb on Sunset Boulevard would be painted red to prohibit parking for 100 feet in both directions from Access Point #1. There is a two-way left-turn median on Sunset Boulevard from which vehicles can turn left into the Project Site. The two-way left-turn median also allows for vehicles to turn left out of the Project Site using only a gap in westbound traffic on Sunset Boulevard, then pausing in the

¹⁷ The Project Site has a circumference of over 0.4 mile.

¹⁸ Consistent with guidelines for a commercial driveway.

median until it is safe to merge with eastbound traffic. No unusual or new obstacles are presented in the design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians.

Based on the analysis in Chapter 9 of the Transportation Analysis, Access Point #1 would carry up to 239 vehicles (184 inbound and 55 outbound) during the morning peak hour and up to 376 vehicles (291 inbound and 85 outbound) during the afternoon peak hour under the Mixed Use Development Scenario, which generates more trips than the No-Hotel Development Scenario. The majority of all trips in and out of the driveway would be right turns. While these turning vehicles may slightly slow westbound through traffic on Sunset Boulevard, it would have a minimal effect on capacity, especially with the proposed red curbs allowing space for right-turning vehicles to decelerate (inbound) or accelerate (outbound) outside of the flow of through traffic.

(ii) Consistency with Modal Priority Networks

As summarized above, Sunset Boulevard is a designated Avenue I and part of the Transit Enhanced Network, the Bicycle Enhanced Network, the Pedestrian Enhanced District, and the High Injury Network. The Project would widen the sidewalk on Sunset Boulevard adjacent to the Project Site from 12 feet to 15 feet, consistent Avenue I street standards, thereby supporting the objectives of the Pedestrian Enhanced District. Access Point #1 would not preclude or interfere with the implementation of future roadway improvements benefiting transit, pedestrians, or bicycles, including potential installation of bicycle lanes on Sunset Boulevard. Inbound Project traffic could also intermittently slow transit buses using the peak period bus-only curb lanes on Sunset Boulevard, but such momentary reductions in speed would not have a substantial effect overall on bus service.

Based on peak period traffic counts at the intersections of Beaudry Avenue & Sunset Boulevard and White Knoll Drive & Sunset Boulevard, fewer than 20 pedestrians per hour and 10 bicyclists per hour travel on Sunset Boulevard adjacent to the Project Site. The Project would result in an increase in both pedestrian and bicycle activity on Sunset Boulevard, though not in sufficient quantities to result in a significant conflict with vehicles using the driveway. Further, pedestrians would have separate dedicated access points mainly off Beaudry Avenue and Sunset Boulevard and bicycle parking is generally concentrated off of Alpine Street and Beaudry Avenue. It is anticipated that the majority of new pedestrian and bicycle activity generated by the Project would enter and exit from the south and east portion of the Site (toward downtown Los Angeles and Union Station), away from Access Point #1.

Based on this review, the Project would not result in any hazards from the design or operation of Access Point #1 and impacts would be less than significant.

(b) Access Point #2: White Knoll Drive to Elysian Parking Facility

Access Point #2 is an unsignalized driveway on White Knoll Drive where it meets Alpine Street, forming a four-way intersection with the northern leg of White Knoll Drive. It provides access to the Elysian Parking Facility for residents of The Elysian and also provides emergency vehicle access to the interior of the Project Site. It does not provide private vehicle access to the Project parking podium or any Project buildings. Like the northern leg of White Knoll Drive, Elysian residents exiting Access Point #2 would be controlled by a stop sign. Through traffic on Alpine Street and the west leg of White Knoll Drive would not be stopped. Pedestrian access would be provided internally between the Elysian and the Elysian Parking Facility.

The location and design of Access Point #2 are consistent with LADOT's *Manual of Policies and Procedures* guidelines. It is a standard dust-pan style driveway design¹⁹ with a single lane in and a single lane out located on a non-arterial street. It would be 30 feet wide in accordance with the requirements for a multi-family residential driveway serving more than 25 parking spaces, or wider if required by the fire department. Gate arms securing access to the Elysian Parking Facility would be located at least 40 feet from the street, in accordance with the guidelines for a structure with 168 parking spaces.

(i) Potential Geometric Design Hazards

Access Point #2 is located along a slightly sloping, concave-curved section of roadway that limits sight distance. However, with implementation of common driveway safety features such as striping a red curb to prohibit on-street parking within a reasonable distance of the edges of the driveway, and given the neighborhood street character and 25 mph statutory speed limit on the street, Access Point #2 will safely serve the Elysian Parking Facility. With only 96 residential units and 168 total parking spaces served, this driveway would experience very light vehicular traffic, even during the peak hours.

(ii) Consistency with Modal Priority Networks

Neither White Knoll Drive nor Alpine Street adjacent to Access Point #2 are designated as part of any of the modal priority networks in the Mobility Plan.

Based on peak period traffic counts collected at the existing T-intersection where Access Point #2 would be located, there are 20 or fewer pedestrians per hour and no bicyclists on White Knoll Drive or Alpine Street adjacent to the Project Site. The Project may result in modest increases in both pedestrian and bicycle activity at this location, but

¹⁹ A dust-pan style driveway has sloping sides and brings the vehicle up to sidewalk level.

not in sufficient quantities to result in a significant conflict with the small number of vehicles using the driveway.

Based on this review, the Project would not result in any hazards from the design or operation of Access Point #2 and impacts would be less than significant.

(c) Access Point #3: Alpine Street

Access Point #3 is an unsignalized driveway on Alpine Street where it intersects with Beaudry Avenue. It would provide secondary commercial and residential access and would be the primary access for service vehicles to the Project Site. The Project Site currently has a driveway at this approximate location for the prior use, so the Project is not introducing new access or substantially altering existing access at this location. As in the present condition, Access Point #3 and the opposing leg of Beaudry Avenue would be controlled by a stop sign. Through traffic on Alpine Street and the south leg of Beaudry Avenue would not be stopped, though the Project would install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street (South), which is less than 200 feet south of Access Point #3.

The location and design of Access Point #3 are consistent with LADOT's *Manual of Policies and Procedures* guidelines. It is a standard dust-pan style driveway design with a single lane in and a single lane out located on a non-arterial street. It would be 30 feet wide in accordance with the requirements for a commercial driveway or a multi-family residential driveway serving more than 25 parking spaces. Gate arms securing access would be located at least 60 feet from the street, in accordance with the guidelines for a structure with greater than 300 parking spaces. Service and delivery vehicle parking and loading areas would be located inside the parking structure. Service vehicles would head in and out, and therefore no vehicles would back into or out of the driveway.

(i) Potential Geometric Design Hazards

Like Access Point #2, Access Point #3 is located along a slightly sloping, concave-curved section of roadway that limits sight distance. However, the Project would install red curb striping (as is present on the existing driveway) to prohibit on-street parking within a reasonable distance of the edges of the driveway, and the driveway is anticipated to operate similarly to the way it did when the prior use of the Project Site was operational. With the red curb, and given the neighborhood street character, 25 mph statutory speed limit, and the fact that there is an existing driveway in approximately the same location, Access Point #3 would safely accommodate service vehicles and as secondary access for other users of the Project Site. Based on the analysis in Chapter 9 of the Transportation Analysis, Access Point #3 is expected to carry up to 259 vehicles during the morning peak

hour (70 inbound, 189 outbound) and 356 vehicles during the afternoon peak hour (112 inbound, 244 outbound).

(ii) Consistency with Modal Priority Networks

Beaudry Avenue is designated as part of the Neighborhood Enhanced Network adjacent to Access Point #3. The Project would widen the sidewalks adjacent to the Project Site from eight feet to 13 feet, consistent with Collector standards, thereby supporting the objectives of the Neighborhood Enhanced Network. Additionally, Access Point #3 would not preclude or interfere with the implementation of any future roadway or sidewalk improvements benefiting pedestrians or bicycles and contributing to the neighborhood character.

Based on peak period traffic counts collected at the existing four-way intersection made up of the existing driveway, Alpine Street, and Beaudry Avenue, where Access Point #3 would also be located, there are currently no pedestrians or bicyclists adjacent to the Project Site. The Project may result in modest increases in both pedestrian and bicycle activity at this location, but not in sufficient quantities to result in a significant conflict with the vehicles using the driveway.

Based on this review, the Project would not result in any hazards from the design or operation of Access Point #3 and impacts would be less than significant.

(d) Access Point #4: Beaudry Avenue

Access Point #4 is an unsignalized driveway on Beaudry Avenue between Alpine Street and Bartlett Street. It would provide primary residential access to the Project Site. Though traffic on Beaudry Avenue would not be stopped in front of Access Point #4, the Project would install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street (South), which is approximately 100 feet east of Access Point #4, and would slow through traffic in both directions.

The location and design of Access Point #4 are consistent with LADOT's *Manual of Policies and Procedures* guidelines. It is a standard dust-pan style driveway design with a single lane in and a single lane out located on a non-arterial street. It would be 30 feet wide in accordance with the requirements for a multi-family residential driveway serving more than 25 parking spaces. Gate arms securing access would be located at least 60 feet from the street, in accordance with the guidelines for a structure with greater than 300 parking spaces.

(i) Potential Geometric Design Hazards

Like Access Points #2 and #3, Access Point #4 is located along a sloping, concave-curved section of roadway that limits sight distance. As at Access Points #2 and #3, the Project would install red curb striping to prohibit on-street parking within a reasonable distance of the edges of the driveway. The curve at Access Point #4 is sharper than the other two Access Points, further reducing the sight distance, and westbound Beaudry Avenue at this location slopes downward, which would tend to increase vehicle speed. Though the traffic volumes forecast for this driveway, as detailed in Chapter 9 of the Transportation Analysis can easily be accommodated, there would be the potential for a hazardous condition resulting from vehicle-to-vehicle conflicts between vehicles exiting Access Point #4 and vehicles traveling westbound on Beaudry Avenue if they traveled at full speed on Beaudry Avenue. However, the Project would install all-way stop-control at the upstream intersection of Beaudry Avenue & Alpine Street (South), approximately 100 feet east of Access Point #4. Therefore, westbound traffic on Beaudry Avenue would be traveling more slowly than under current conditions and would allow Access Point #4 to operate safely.

(ii) Consistency with Modal Priority Networks

Beaudry Avenue is designated as part of the Neighborhood Enhanced Network adjacent to Access Point #4. The Project would widen the sidewalks adjacent to the Project Site from eight feet to 13 feet, consistent with Collector standards, thereby supporting the objectives of the Neighborhood Enhanced Network. Additionally, Access Point #4 would not preclude or interfere with the implementation of future roadway or sidewalk improvements benefiting pedestrians or bicycles and contributing to the neighborhood character.

Based on peak period traffic counts collected at the nearby intersections of Beaudry Avenue & Alpine Street and Beaudry Avenue & Bartlett Street, there is currently no pedestrian or bicyclist activity adjacent to the Project Site in the vicinity of Access Point #4. The Project would result in modest increases in both pedestrian and bicycle activity at this location, especially as one of the long-term bicycle parking areas for residents would be accessed from Access Point #4. However, the Project-related pedestrian and bicycle traffic would not reach quantities that would result in a significant conflict with the vehicles using the driveway.

Based on this review, the Project would not result in any hazards from the design or operation of Access Point #4 and would not result in a significant impact.

(e) *Access Point #5: Beaudry Avenue Inbound to Sunset Building*

Access Point #5 is an inbound-only driveway to the pick-up/drop-off area in front of the Sunset Building at the southwest corner of the Project Site. Under the Mixed Use Development Scenario, the Sunset Building would house the hotel and approximately 20,000 square feet of associated retail and restaurant space. Under the No-Hotel Development Scenario, the Sunset Building would house approximately 90 residential units and 20,000 square feet of retail and restaurant space. From within the pick-up/drop-off area, there would be access to the Project's parking structure. Vehicles picking up or dropping off passengers, but not parking, would exit via Access Point #6, which is a right-in/right-out driveway to Sunset Boulevard northwest of Beaudry Avenue.

Because Access Point #5 would be located approximately 75 feet northeast of the intersection of Beaudry Avenue & Sunset Boulevard, only right-turns would be allowed into the driveway. A physical barrier would be installed down the centerline of Beaudry Avenue to prevent illegal left turns (which could result in queuing and safety impacts).

The location of Access Point #5 complies with the *Manual of Policies and Procedures* guideline to locate non-arterial driveways at least 75 feet from the arterial street. Access Point #5 would have a standard dust-pan style design which would help discourage drivers on Beaudry Avenue from using it as a cut-through route to northbound Sunset Boulevard. The driveway would be 16 feet wide as recommended for a standard one-way driveway.

(i) *Potential Geometric Design Hazards*

Because Access Point #5 would only allow right-turns inbound from a Collector street, there is minimal potential for hazards related to the design of the driveway. Approaching vehicles would have good visibility of not just the driveway, but the majority of the pick-up/drop-off area to which the driveway provides access.

(ii) *Consistency with Modal Priority Networks*

Beaudry Avenue is designated as part of the Neighborhood Enhanced Network adjacent to Access Point #5. By prohibiting (and physically restricting) left turns into Access Point #5, the amount of traffic that would enter the Sunset Building pick-up/drop-off area from Beaudry Avenue would be reduced, helping to maintain the neighborhood character of the street. Access Point #5 would not preclude or interfere with the implementation of any future roadway or sidewalk improvements benefiting pedestrians or bicycles.

Based on peak period traffic counts collected at the intersection of Beaudry Avenue & Sunset Boulevard, there are currently minimal numbers of pedestrians and bicyclists on Beaudry Avenue adjacent to Access Point #5. The Project is designed to encourage and accommodate increases in pedestrian and bicycle activity at this location, but not in sufficient quantities to result in a significant conflict with the limited number of vehicles using the driveway. Additionally, as noted above, approaching vehicles would have excellent visibility prior to entering the driveway.

Based on this review, the Project would not result in any hazards from the design or operation of Access Point #5 and would not result in a significant impact.

(f) Access Point #6: Sunset Boulevard Right-In/Right-Out Driveway

Access Point #6 would be located on Sunset Boulevard approximately 70 feet northwest of Beaudry Avenue. It would serve as the primary Access Point for the pick-up/drop-off area at the Sunset Building at the southwest corner of the Project Site. Under the Mixed Use Development Scenario, the Sunset Building would house the hotel and approximately 20,000 square feet of associated retail and restaurant space. Under the No-Hotel Development Scenario, the Sunset Building would house approximately 90 residential units and 20,000 square feet of retail and restaurant space. From within the pick-up/drop-off area, there would be access to the Project's parking structure. Vehicles would also have the option to enter the pick-up/drop-off area via Access Point #5, which is a right-in-only driveway from Beaudry Avenue.

LADOT's *Manual of Policies and Procedures* recommends that a driveway should be located on a non-arterial street where possible. The Project has frontage along several non-arterial streets (White Knoll Drive, Alpine Street, and Beaudry Avenue) and, accordingly, proposes access on each. However, with the Project Site's nearly 500 feet of frontage along Sunset Boulevard, the grade differential between the various sides of the Project Site, the more residential character of the non-arterial streets, and the fact that the Sunset Building faces Sunset Boulevard, the Project proposes Access Point #6 to serve as a "front door" vehicular entrance for hotel guests (under the Mixed Use Development Scenario) or Sunset Building residents (under the No-Hotel Development Scenario). Not only would this help to preserve the Collectors on the other sides of the Project Site for lower-volume residential traffic (including neighborhood traffic), but it would help to reduce VMT associated with vehicles circulating the Project Site.

(i) Potential Geometric Design Hazards

Access Point #6 would be limited to right turns in and out on Sunset Boulevard due to its proximity to Beaudry Avenue. For drivers exiting the driveway onto Sunset Boulevard, there would be approximately 280 feet of sight distance looking southeast at approaching

vehicles, which exceeds the 250 feet minimum stopping sight distance for 35 mph roadways indicated in Table 201.1 of *Highway Design Manual* (Caltrans, updated March 2020). Westbound Sunset Boulevard slopes upward approaching Access Point #6, thereby further improving a vehicle's stopping ability. Additionally, the Project-adjacent curb on Sunset Boulevard would be painted red to prohibit parking between Beaudry Avenue and a point 100 feet northwest of Access Point #6 to ensure that visibility would not be impeded by parked vehicles. No unusual or new obstacles are presented in the design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians.

Based on the analysis in Chapter 9 of the Transportation Analysis, Access Point #6 would carry up to 53 vehicles (34 inbound and 19 outbound) during the morning peak hour and up to 66 vehicles (37 inbound and 29 outbound) during the afternoon peak hour under the Mixed Use Development Scenario, which generates more trips than the No-Hotel Development Scenario. As with vehicles using Access Point #1 further to the northwest on Sunset Boulevard, while vehicles turning into Access Point #6 may slightly slow westbound through traffic on Sunset Boulevard, these momentary reductions in speed would have a minimal effect on capacity.

(ii) Consistency with Modal Priority Networks

As summarized in Chapter 2 of the Transportation Analysis, Sunset Boulevard is a designated Avenue I and part of the Transit Enhanced Network, the Bicycle Enhanced Network, the Pedestrian Enhanced District, and the HIN. The Project would widen the sidewalk on Sunset Boulevard adjacent to the Project Site from 12 feet to 15 feet, consistent with Avenue I street standards, thereby supporting the objectives of the Pedestrian Enhanced District. Access Point #6 would not preclude or interfere with the implementation of future roadway improvements benefiting transit, pedestrians, or bicycles, including potential installation of bicycle lanes on Sunset Boulevard. The volume of traffic using this driveway are too low to have a material effect on the operation of the peak period bus-only curb lanes on Sunset Boulevard.

Based on peak period traffic counts at the intersections of Beaudry Avenue & Sunset Boulevard and White Knoll Drive & Sunset Boulevard, fewer than 20 pedestrians per hour and 10 bicyclists per hour travel on Sunset Boulevard adjacent to the Project Site. The Project would intensify both pedestrian and bicycle activity on Sunset Boulevard, though not in sufficient quantities to result in a significant conflict with vehicles using Access Point #6. Further, pedestrians would have separate dedicated access points mainly off Beaudry Avenue and Sunset Boulevard and bicycle parking is generally concentrated off of Alpine Street and Beaudry Avenue. The primary pedestrian access to the Project Site in the vicinity of Access Point #6 is nearer to Access Point #5 on Beaudry Avenue, and those pedestrians would reach the northwest corner of the intersection of Beaudry Avenue & Sunset Boulevard via Beaudry Avenue, and not crossing Access Point

#6. Therefore, the Project would not substantially add to pedestrian or bicycle volumes across Access Point #6, and, when combined with the limited volumes using Access Point #6, would not cause a hazard.

Based on this review, the Project would not result in any hazards from the design or operation of Access Point #6 and would not result in a significant impact.

(g) Incompatible Uses

With regard to the potential to introduce incompatible uses, as described in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site primarily includes residential and commercial uses. The Project proposes the development of residential uses, office space, hotel (under the Mixed Use Development Scenario) and commercial uses. **Therefore, the Project would not introduce incompatible uses to the Project Site or surrounding area.**

(h) Caltrans Analysis

Based on the Project's trip generation estimate and traffic distribution pattern detailed in Chapter 9 of the Transportation Analysis, which was reviewed and approved by LADOT, the Project would add 25 or more peak hour trips to one off-ramp: I-110 southbound off-ramp to Figueroa Terrace, an unsignalized ramp located approximately 900 feet east of the Project Site. The Project would add approximately 33 trips during the afternoon peak hour under the Mixed Use Development Scenario and approximately 32 trips during the afternoon peak hour under the No-Hotel Development Scenario.

The 95th percentile ramp queue was calculated using the *Highway Capacity Manual, 6th Edition* (Transportation Research Board, 2016) (HCM) methodology used in the operating conditions analysis in Chapter 9 of the Transportation Analysis. 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 2028, with and without traffic from the Mixed Use Development Scenario (the higher-generating and thus more conservative Development Scenario to use in this analysis).

The results of the analysis indicate that the queue length under Future with Project Conditions under the Mixed Use Development Scenario would be 1.2 vehicle lengths (approximately 30 feet based on 25 feet per vehicle) during the morning peak hour and 3.9 vehicle lengths (approximately 98 feet) during the afternoon peak hour compared with a ramp length of approximately 500 feet. Even though the afternoon peak hour queue would exceed two car lengths, because the ramp queue would be less than the ramp length, no significant impact would occur according to the criteria described above. Therefore, no mitigation is required. The No-Hotel Development Scenario, which adds fewer trips to the

off-ramp during both peak hours, would have a lesser impact on the off-ramp queue and therefore would also not result in a significant impact.

Based on the above, the Project would not substantially increase hazards at Caltrans facilities, and impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction Impacts

While most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, and Beaudry Avenue. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, as part of the Construction Management Plan included as TRA-PDF-1, construction-related deliveries and haul trips would be scheduled to occur outside the commuter peak hours to the extent feasible, thereby reducing the effect on traffic flow on surrounding streets. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained. **Therefore, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.**

(b) Operational Impacts

As described above, existing vehicular access to the Project Site would be enhanced and would be provided via six access points surrounding the Project Site, including one primary emergency access driveway, which would also serve the Elysian Parking Structure. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Based on the above, Project operation would not result in inadequate emergency access and impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to emergency access 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.

e. 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 nine Related Projects are located within 0.5 mile, including Related Projects 3, 18, 29, 32, 42,

57, 64, 66, and 75. Eight of those Related Projects are fully or primarily residential²⁰ and one (Related Project #66) is a medical office building.

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 provides a mix of land uses) would specifically support key policies (such as enhancing pedestrian infrastructure), while most 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 nine Related Projects, would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.**

(b) Vehicle Miles Traveled

A development project would have a cumulative VMT impact if it were deemed inconsistent with RTP/SCS, the regional plan to reach state air quality and GHG reduction targets.²¹ 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 in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. **Therefore, the Project would have no 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. The nearest Related Project is at 1185 Sunset Boulevard (Related Project #29) and would have

²⁰ Related Projects 3 and 42 each include up to 30,000 square feet of ground-floor retail space under 600 and 1,500 apartment units, respectively.

²¹ As discussed above, on September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability. The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS, the Project would also be consistent with the 2020–2045 RTP/SCS. In addition, the Project would be consistent with the growth projections in both the 2016–2020 RTP/SCS and the 2020–2045 RTP/SCS. As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the NOP for the Project on May 21, 2018, this section and the balance of this Draft EIR focus on Project consistency with the 2016–2020 RTP/SCS.

access directly to the existing signalized intersection at Marion Avenue & Sunset Boulevard, approximately 700 feet from Access Point #1. Traffic from the Related Projects, which was accounted for in the analysis of operating conditions above, in some cases affects the amount of traffic on the street adjacent to the Project Site but does not influence the design of Project Access Points. **Therefore, as the Project would not result in individually significant impacts after mitigation, it would also not result in cumulatively significant impacts.**

(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 applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and 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 study area and would not be concentrated to a specific location. Furthermore, as previously discussed, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, 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.