The Partially Recirculated Draft Environmental Impact Report (EIR) on the Hollywood Community Plan was released and made available for public review on October 31, 2019. A copy of the Partially Recirculated Draft EIR is included here. For a full copy of the Partially Recirculated Draft EIR, including the appendices, please visit the Department of City Planning's website at: https://planning4la.org/development-services/eir.

A physical copy of the Partially Recirculated Draft EIR is also available for review by appointment at the City of Los Angeles Department of City Planning at 200 N. Spring Street, Room 667, Los Angeles. Appointments must be made in advance by emailing hollywoodplan@lacity.org.

DEPARTMENT OF
CITY PLANNING

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October 31, 2019

NOTICE OF AVAILABILITY OF A PARTIALLY RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT

Hollywood Community Plan Update
City EIR No. ENV-2016-1451-EIR
CPC-2016-1450-CPU
State Clearinghouse No. 2016041093

TO: Affected Agencies, Organizations, and Other Interested Parties

PROJECT NAME: Hollywood Community Plan Update

REASONS FOR RECIRCULATION: In accordance with the California Environmental Quality Act (CEQA), the City of Los Angeles (City), as Lead Agency, has prepared a Partially Recirculated Draft Environmental Impact Report (RDEIR) for the proposed Hollywood Community Plan Update (Proposed Plan). This RDEIR includes only the sections of the EIR that require updating since publication of the Draft EIR.

Since the publication of the Draft EIR in November 2018, the Natural Resources Agency certified new guidelines for transportation impacts under CEQA in response to Senate Bill (SB) 743 which directed the Office of Planning and Research (OPR) to establish criteria for determining the significance of transportation impacts by a metric other than level of service (LOS) or similar measures of vehicular capacity or traffic congestion. In response to SB 743 and the new CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, the City of Los Angeles adopted new transportation thresholds for CEQA in July 2019. Therefore Section 4.15, Transportation and Traffic, has been updated to reflect the new CEQA Guidelines and the City's adopted transportation thresholds. In addition, the transportation analyses in Chapter 5.0, Alternatives, have also been updated to reflect the new CEQA guidelines, and the discussion of transportation impacts and impact conclusions for each of the Project Alternatives has been revised to reflect the City's adopted transportation thresholds. Finally, a new appendix (Appendix N) is provided for the Draft EIR to supplement the analysis in Section 4.3, Air Quality to respond to the decision in *Sierra Club v. County of Fresno* (December 2018) and why it is not feasible to further describe the associated health effects of the projects significant and unavoidable air quality impacts. Only those portions of the Draft EIR that include significant new information are being recirculated.

This notice provides the general public, the local community, responsible agencies, and other interested parties with a summary of the Proposed Plan (which is not changing as compared to that presented and analyzed in the Draft EIR); conclusions of the Draft EIR and RDEIR, information regarding the availability of the RDEIR for public review, directions for submitting comments, and the timeframe for submitting comments on the RDEIR. Comments must be submitted in writing according to the directions below.

COMMENT REVIEW PERIOD: October 31, 2019 to December 16, 2019

PROJECT LOCATION: The Hollywood Community Plan Area (CPA) is located within the incorporated City of Los Angeles and contains approximately 13,962 acres or 21.8 square miles. The CPA extends roughly south of the Cities of Burbank and Glendale and the Ventura Freeway (State Route 134), west of the Golden State Freeway (Interstate 5), north of Melrose Avenue and south of Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including land south of the City of West Hollywood, and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue.

COUNCIL DISTRICTS: 4, 5 and 13

PROJECT BACKGROUND: The Hollywood Community Plan is one of 35 Community Plans, which comprise the Land Use Element of the General Plan. The Land Use Element is one of the seven State-mandated elements of the General Plan that also include noise, transportation, and conservation among others. The Hollywood Community Plan (the land use plan for Hollywood) is being updated consistent with California Code Section 65302 for General Plans.

The City previously approved an update to the Hollywood Community Plan in substantially similar form as the Proposed Plan and certified EIR No. ENV-2005-2158-EIR, SCH No. 2002041009 (2012 EIR), on June 19, 2012 (2012 Approvals). On February 11, 2014, after a legal challenge to the 2012 Approvals, the Los Angeles Superior Court issued a Judgment directing the City to: (1) rescind its 2012 Approvals and (2) prepare, circulate and certify, consistent with the requirements of CEQA, an adequate and valid EIR, which could include a supplemental, revised 2012 EIR or a new EIR. The City elected to prepare a new EIR for the Proposed Plan.

PROJECT DESCRIPTION: The Project Description remains the same as presented in the Draft EIR. The Proposed Plan would guide development for the Hollywood CPA through 2040 and includes amending both the text (land use policies) and the land use map of the Hollywood Community Plan. The Proposed Plan would also adopt several resolutions and zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development regulations (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan), and development of a Community Plan Implementation Overlay (CPIO) District.

The Hollywood CPIO District Subarea boundaries would generally follow Franklin Avenue to the north, U.S. Route 101 (US-101) to the east, Fountain Avenue to the south and La Brea Avenue to the west. The CPIO District would propose regulatory protections for designated historical resources and pedestrian-oriented design standards in the Hollywood CPA. The CPIO would require that the rehabilitation of designated resources comply with the Secretary of the Interior's Standards and restrict applicants from obtaining a demolition permit without an approved replacement project. Also, to ensure consistency between the updated Community Plan and other City plans and ordinances, the Proposed Plan includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

The table below identifies the reasonably expected population, housing, and employment in the Proposed Plan, and compares this to the 2016 Baseline, Existing Plan and Southern California Association of Governments (SCAG) 2040 projections. Note: Revisions to the Reasonably Expected Development were updated after publication of the Notice of Preparation to respond to new data and analysis that occurred during the preparation of the Draft EIR.

2040 REASONABLY EXPECTED DEVELOPMENT OF THE HOLLYWOOD COMMUNITY PLAN

	2016 Baseline	Existing Plan	Proposed Plan	SCAG 2040 Forecast /c/
Population	206,000	226,000 – 243,000	243,000 - 264,000	226,000
Housing /a,b/	104,000	113,000 – 121,000	121,000 - 132,000	113,000
Employment	101,000	119,000	124,000 - 127,000	119,000

Numbers are rounded to the nearest thousand.
/a/ SCAG provides forecasts for households, which is the equivalent of occupied housing units, and does not include all units.
/b/ The Existing Plan and the Proposed Plan factor in additional housing units that can be expected from the City's housing incentives. It assumes all units are occupied.
/c/ The SCAG 2040 Forecast does not factor in potential additional units from the City's TOC Guidelines, which were adopted in 2017 after the adoption of the SCAG 2016/2040 RTP/SCS.
SOURCE: SCAG 2016-2040 RTP/SCS; City of Los Angeles, 2016, 2018.

ENVIRONMENTAL EFFECTS: The Draft EIR identifies the following unavoidable significant environmental impacts: Air Quality (Violate Air Quality Standards during Construction and Operations; Cumulative Net Increase in Criteria Pollutants; Sensitive Receptors during Construction); Biological Resources (Special Status Species Habitat, Riparian Habitat, Wetlands, and Migratory Wildlife); Cultural Resources (Historical Resources); Noise (Groundborne Vibration/Noise; and Permanent and Temporary Noise increases); and Public Services (Parks). This RDEIR does not change any of the unavoidable significant adverse impacts listed above. Under the RDEIR, none of the transportation and traffic impacts of the Proposed Plan are identified as significant.

DOCUMENT REVIEW AND COMMENT:

In accordance with CEQA Guidelines Section 15088.5(f)(2), the City is requesting that reviewers limit their comments to the revised Section 4.15, Chapter 5.0 and Appendix N that are recirculated in the Partially Recirculated Draft EIR. Pursuant to CEQA Guidelines Section 15088.5(f)(2), in the Final EIR, the City will provide responses to (i) comments received during the initial circulation period that relate to chapters, sections, appendices or portions of the Draft EIR that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapter, sections, appendices of the Draft EIR that were revised and recirculated.

The RDEIR is available for public review for a 45-day period from October 31, 2019 to December 16, 2019. If you wish to review a copy of the RDEIR, you may do so at the City of Los Angeles Department of City Planning at: 200 North Spring Street, Room 667, Los Angeles. Copies of the RDEIR are also available for general public review at the following City of Los Angeles Public Library branches:

Richard J. Riordan Central Library
630 W. 5th Street
Los Angeles, CA 90071

Cahuenga Branch Library
4591 Santa Monica Boulevard
Los Angeles, CA 90029

Frances Howard Goldwyn - Hollywood Regional Branch Library
1623 Ivar Avenue
Los Angeles, CA 90028

John C. Fremont Branch Library
6121 Melrose Avenue
Los Angeles, CA 90038

Los Feliz Branch Library
1874 Hillhurst Avenue
Los Angeles, CA 90027

Will & Ariel Durant Branch Library
7140 Sunset Boulevard
Los Angeles, CA 90046

The RDEIR can be downloaded or reviewed at the Department of City Planning's website [planning.lacity.org/development-services/eir]. The RDEIR can be purchased on cd-rom for $7.50 per copy. Contact Linda Lou at linda.lou@lacity.org or (213) 978-1473 to purchase one.

If you wish to submit comments on the RDEIR, comply with the following instructions. The comments shall be written or typed and the comment shall include the commenter's name, contact information, and file number ENV-2016-1451-EIR. The written or typed comments shall be submitted to Linda Lou, in one of the following manners:

Mail: Linda Lou
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012

E-mail: linda.lou@lacity.org

Written comments must be submitted between October 31, 2019 and December 16, 2019, and **no later than 5:00 PM on December 16, 2019**.

Comments that fail to comply with the above instructions for submissions for comments on the RDEIR may not be included in the Final EIR and receive a response to comments under CEQA Guidelines Section 15088 and 15088.5.

LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

RECIRCULATED PORTION OF DRAFT ENVIRONMENTAL IMPACT REPORT

Hollywood Community Plan Update

Environmental Case: ENV-2016-1451-EIR
State Clearinghouse No.: 2016041093

Project Location: The Hollywood Community Plan Area (CPA) is located within the incorporated City of Los Angeles and contains approximately 13,962 acres or 21.8 square miles. The CPA extends roughly south of the Cities of Burbank and Glendale and the Ventura Freeway (State Highway 134), west of the Golden State Freeway (Interstate 5), north of Melrose Avenue and south of Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including land south of the City of West Hollywood, and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue.

Community Plan Area: Hollywood

Council District: 4 – Ryu, 5 – Koretz, 13 – O'Farrell

Project Description: The Hollywood Community Plan Update (Project) would guide development for the Hollywood CPA through 2040 and includes amending both the text and the land use map of the Hollywood Community Plan. The Proposed Project would also adopt several resolutions and zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development standards (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan), and adoption of a Hollywood Community Plan Implementation Overlay (CPIO) District. Also, to ensure consistency between the updated Community Plan and other City plans and ordinances, the Proposed Project includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

Since the publication of the Proposed Project's Draft EIR, the City of Los Angeles adopted new transportation thresholds in July 2019 pursuant to Senate Bill 743. Section 4.15, Transportation and Traffic, of the Draft EIR is updated to reflect the City's new transportation thresholds, which use vehicle miles traveled (VMT) as the primary metric for determining transportation impacts. Also, the transportation analyses in Chapter 5.0, Alternatives, is updated to reflect the City's new adopted VMT transportation thresholds. Finally, a new appendix (Appendix N) is provided for the Draft EIR to supplement the analysis in Section 4.3-Air Quality to respond to the decision in Sierra Club v. County of Fresno (December 2018) and why it is not feasible to further describe the associated health effects of the projects significant and unavoidable air quality impacts. The Partially Recirculated Draft EIR, therefore, consists of Section 4.15, Chapter 5.0, and the new Appendix N.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Terry A. Hayes Associates Inc.

October 2019

HOLLYWOOD COMMUNITY PLAN UPDATE

PARTIALLY RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT

Prepared for

THE CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
200 North Spring Street, Room 667
Los Angeles, CA 90012

Prepared by

TERRY A. HAYES ASSOCIATES INC.
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Culver City, CA 90232

FEHR & PEERS
600 Wilshire Boulevard, Suite 1050
Los Angeles, CA 90017

October 2019

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1.0 INTRODUCTION TO THE RECIRCULATED DRAFT EIR

NOTICE: This is a partial recirculation to the Hollywood Community Plan Update Draft EIR published on November 15, 2018 (City EIR No. ENV-2016-1451-EIR). The only portions being recirculated are Sections 4.15, Transportation and Chapter 5.0 Alternatives, and new Appendix N. The City is requesting that reviewers limit their comments to the revised Section 4.15, Chapter 5.0 and new Appendix N that are recirculated in the Recirculated Draft EIR (RDEIR). Pursuant to CEQA Guidelines Section 15088.5, in the Final EIR, the City will provide responses to (i) comments received during the initial circulation period that relate to chapters, sections, appendices or portions of the Draft EIR that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapter, sections, appendices of the Draft EIR that were revised and recirculated. The proposed revisions in Section 4.15 and Chapter 5.0, and Appendix N are summarized below.

1.1 INTRODUCTION TO THE RECIRCULATED DRAFT EIR

Since the publication of the Hollywood Community Plan Update Draft EIR in November 2018, the Natural Resources Agency certified new guidelines for transportation impacts under the California Environmental Quality Act (CEQA). The CEQA guidelines were updated in response to Senate Bill (SB) 743 which directed the Office of Planning and Research (OPR) to establish criteria for determining the significance of transportation impacts by a metric other than level of service (LOS) or similar measures of vehicular capacity or traffic congestion.[1] In response to SB 743 and the new CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, the City of Los Angeles adopted new transportation thresholds for CEQA in July 2019.[2]

SB 743 changes the way cities measure project impacts by encouraging projects to reduce their GHG emissions through measuring vehicle miles traveled (VMT) versus the historical priority of reducing vehicle delay at intersections (LOS) through roadway widening as a mitigation. The State as a whole, including the City, recently updated their CEQA Guidelines with respect to the focus of transportation planning and traffic impact analysis. The previous significance thresholds for traffic operations impacts based on LOS are no longer relevant. Instead, as directed by SB 743, the State, including the City, has moved to a VMT focus, with the objective being to reduce VMT (and therefore GHG) as appropriate.

Los Angeles, like all urban environments, is in a constant state of gradual evolution. As population grows, as the built environment changes, and as technology advances, the City must find new ways to achieve its many goals, including its goal of improving mobility. Historically, roadway capacity enhancement projects have been used to mitigate congestion and improve LOS. However, in urban areas like Hollywood, roadway capacity improvements would require acquisition of right-of-way, including the demolition of buildings on parcels adjacent to existing roadways that would physically alter the makeup of communities. Additionally, research has shown that adding roadway capacity does not reduce congestion, but rather induces more vehicle travel as well as GHG emissions associated with that additional vehicle travel.[3] In addition to the constraints of the built environment, recent legislation, such as SB 743, has shaped the types of transportation improvements being considered by the City.

[1] SB 743, 2013-2014 CA State Cong. § 386 (2013)

[2] City of Los Angeles California Environmental Quality Act (CEQA) Transportation Thresholds, 2019.

[3] National Center for Sustainable Transportation Policy Brief. Department of Environmental Science and Policy, University of California, Davis. Handy, Susan. 2015, October. *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion.* Available: http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf. Accessed on: May 24, 2016.

The transportation improvements identified in the Proposed Plan are consistent with the City's Mobility Plan 2035 and were developed to improve the circulation system as measured by VMT, rather than LOS. As described by the OPR, possible mitigations for VMT include improving or increasing access to transit, improving pedestrian or bicycle networks, providing traffic calming, providing bicycle parking, providing car-sharing, bike sharing, and ride sharing programs, and parking demand management programs. The Proposed Plan's preliminary list of representative transportation improvement types are not exhaustive and include transit enhancements, active transportation projects, transportation demand management programs, and roadway and ITS projects; these improvements are intended to mitigate VMT.

Section 4.15, Transportation and Traffic, has been updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds. The mobility network contained in the Proposed Plan has not changed since the publication of the Draft EIR. However, the Recirculated Draft EIR section has been updated to reflect VMT as the primary metric for transportation impacts and the impact conclusions and mitigation measures have been updated accordingly.

Chapter 5.0, Alternatives, has also been updated to reflect the new CEQA Guidelines. The discussion of transportation impacts and impact conclusions for each of the Project Alternatives in the Recirculated Draft EIR Alternatives chapter has been revised to reflect the City's adopted transportation thresholds. Specifically, the comparison of existing traffic conditions to the Proposed Plan and Project Alternatives as well as Table 5-3 and Table 5-4 have been updated to reflect VMT as the primary metric for transportation impacts. No changes have been made to the five Project Alternatives included in the Draft EIR or to the other impact conclusions.

In addition to considering the primary impacts of the Proposed Plan, CEQA also requires that any secondary impacts resulting from the Proposed Plan also be considered. The potential secondary impacts of the Proposed Plan have been included in Section 4.15, Transportation and Traffic. Specifically, the discussion of emergency access has been updated to reflect the potential secondary impacts resulting from increased congestion in the Plan Area due to additional development and regional background growth. While congestion is no longer the primary metric for considering transportation impacts under CEQA, LOS may still be relevant in certain areas when considering the secondary impacts of a project.

Finally, a new appendix (Appendix N) is provided for the Hollywood Community Plan Update Draft EIR to supplement the analysis in Section 4.3, Air Quality. In 2018, the Supreme Court held in *Sierra Club v. County of Fresno* (December 2018) that when a project has significant and unavoidable air quality impacts, the lead agency is required to discuss and identify the associated health effects that will result from those air quality impacts and also that if the lead agency did not do that it provide an explanation in the EIR as to why it could not do that analysis. The City has prepared a white paper with the assistance of an expert panel of air quality experts to explain with evidence why it is not feasible based on the existing models and methodologies to identify the associated health effects of the Proposed Plan resulting from the identified significant and unavoidable air quality impacts.

1.2 RECIRCULATED DRAFT EIR REVIEW PROCESS

In accordance with CEQA Guidelines Section 15088.5(f)(2), the City is requesting that reviewers limit their comments to the revised Section 4.15, Chapter 5.0 and Appendix N that are recirculated in the Recirculated Draft EIR (RDEIR). Pursuant to CEQA Guidelines Section 15088.5(f)(2), in the Final EIR, the City will provide responses to (i) comments received during the initial circulation period that relate to chapters, sections, appendices or portions of the Draft EIR that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapter, sections, appendices of the Draft EIR that were revised and recirculated.

The Recirculated Draft EIR is available for public review for a 45-day period from October 31, 2019 to December 16, 2019. The Recirculated Draft EIR will also be submitted to the State Clearinghouse for distribution to state agencies.

During the review period, copies of the Recirculated Draft EIR will be available for review at the City of Los Angeles Department of City Planning during normal business hours (see address below).

City of Los Angeles
Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

The RDEIR can be downloaded or reviewed at the Department of City Planning's website [planning.lacity.org/development-services/eir].

If you wish to submit comments on the RDEIR, comply with the following instructions. The comments shall be written or typed and the comment shall include the commenter's name, contact information, and file number ENV-2016-1451-EIR. The written or typed comments shall be submitted to Linda Lou, in one of the following manners:

Mail: Linda Lou
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012

E-mail: linda.lou@lacity.org

4.15 TRANSPORTATION AND TRAFFIC

This section provides an overview of transportation and mobility in the Project Area and analyzes the operational impacts associated with the Proposed Plan. Topics addressed in this include the circulation and mobility systems, vehicle miles traveled (VMT), and emergency access.

REGULATORY FRAMEWORK

Federal, state, regional, and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

Americans with Disabilities (ADA) Act of 1990. Titles I, II, III, and V of the ADA have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

STATE

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

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

Complete Streets Directive. California Department of Transportation (Caltrans) enacted Complete Streets: Integrating the Transportation System (Complete Streets Directive) in October 2008, which required cities to plan for a "balanced, multimodal transportation network that meets the needs of all users of streets."[1] A complete street is a transportation facility that is planned, designed, operated, and maintained to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, truckers, and motorists, appropriate to the function and context of the facility. Every complete street looks different, according to its context, community preferences, the types of road users, and their needs.

Statewide Transportation Improvement Program (STIP). Caltrans administers transportation programming for the State. Transportation programming is the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues

[1] Caltrans, *Implementation Policy of Complete Streets: Integrating the Transportation System*, http://www.dot.ca.gov/hq/tpp/offices/ocp/complete_streets.html, accessed on September 9, 2014.

over a multi-year period to transportation projects. The STIP is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources.

Congestion Management Program (CMP). To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State, the CMP was enacted by Proposition 111, passed by voters in 1990. The intent of the CMP is to provide the analytical basis for transportation decisions through the STIP process.

Senate Bill (SB) 743. SB 743 directs the Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. These changes will include elimination of auto delay, level of service (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. Further, parking impacts are not considered significant impacts on the environment for particular types of development projects within certain infill areas with nearby frequent transit service. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "…more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, which was an update to Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743, which had been released August 6, 2014. The Draft EIR was prepared in consideration of the OPR proposed updates. Of particular relevance was the updated text of the proposed new Section 15064.3 that relates to the determination of the significance of transportations impacts, alternatives and mitigation measures. The following key text concerning the analysis of transportation impacts is taken directly from the document:

> *(b) Criteria for Analyzing Transportation Impacts.*
>
> *Lead agencies may use thresholds of significance for vehicle miles traveled recommended by other public agencies or experts provided the threshold is supported by substantial evidence.*
>
> *(1) Vehicle Miles Traveled and Land Use Projects. A development project that results in vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor may be presumed to cause a less than significant transportation impact. Similarly, development projects that decrease vehicle miles traveled in the project area compared to existing conditions may be considered to have a less than significant transportation impact.*
>
> *(2) Induced Vehicle Travel and Transportation Projects. Additional lane miles may induce automobile travel, and vehicle miles traveled, compared to existing conditions. Transportation projects that reduce, or have no impact on, vehicle miles traveled may be presumed to cause a less than significant transportation impact. To the extent that the potential for induced travel has already been adequately analyzed at a programmatic level, a lead agency may incorporate that analysis by reference.*

In November 2017, OPR submitted the final guidelines to the Natural Resources Agency. The subsequent "rulemaking" process took one year, with the guidelines certified and adopted in December 2018. SB 743 is in effect, and agencies have an opt-in period until July 1, 2020. As discussed above, this Recirculated Draft EIR includes a revised Section 4.15 to respond to the new Guideline Section 15064.3, which reads:

(a) Purpose.

This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.

(b) Criteria for Analyzing Transportation Impacts.

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half 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 vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

(c) Applicability.

The provisions of this section shall apply prospectively as described in section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.

Parking Cash Out. Assembly Bill (AB) 2109, is a state law requiring employers of 50 or more employees who lease their parking and subsidize any part of their employee parking to offer their employees the opportunity to give up their parking space and rideshare to work instead. In return for giving up their parking space, the employer pays the employee the cost of the parking space.

Assembly Bill 32 (AB32) and Senate Bill 375 (SB 375). With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (California ARB) is coordinating the response to comply with AB 32.

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

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

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

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

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

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

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

REGIONAL

A number of regional improvement plans affect transportation in the City of Los Angeles. They include the Los Angeles County CMP and the Long Range Transportation Plan (LRTP) prepared by Los Angeles County Metropolitan Transportation Authority (Metro), the RTP/SCS, and the Regional Transportation Improvement Plan (RTIP), prepared by Southern California Association of Governments (SCAG), and the City of Los Angeles General Plan, which includes the Mobility Plan (MP) 2035.

Metro Congestion Management Program (CMP). The Los Angeles County Metropolitan Transportation Authority (Metro) has been required by state law to prepare, and update on a biennial basis, the Congestion Management Program (CMP) for the County of Los Angeles. The CMP process was established as part of a 1990 legislative package to implement Proposition 111, which increased the state gas tax from 9 to 18 cents per gallon. The intent of the CMP was to tie the appropriation of new gas tax revenues by linking transportation and land use decisions to mitigate congestion. Under the CMP, the 88 incorporated cities plus the County of Los Angeles share various statutory responsibilities, including monitoring traffic count locations on select arterials, implementing transportation improvements, adoption of travel demand management and land use ordinances, and mitigating congestion impacts. The framework for the CMP is based on the premise that congestion can be mitigated by continuing to add capacity to roadways. This is evidenced by the primary metric that drives the program, which is Level of Service (LOS).

While the CMP requirement was one of the pioneering efforts to conduct performance-based planning, the approach has become antiquated and expensive. Recent state laws, such as AB 32, SB 375, and SB 743,— all move away from LOS directly or indirectly and instead focus on VMT as the appropriate metric to evaluate the performance of transportation investment. In sum, the CMP contradicts these key state policies and Metro's own efforts to promote a more sustainable and equitable regional transportation plan.

On June 28, 2018, the Metro Board of Directors initiated the process to opt out of the state mandated CMP. California Government Code §65088.3 states that jurisdictions within a county may opt out of the CMP requirement without penalty, if a majority of local jurisdictions representing a majority of the county's population formally adopt resolutions requesting to opt out of the program. The City of Los Angeles opted out of the CMP in July 2019 upon the adoption of the City's new CEQA metrics for transportation. On August 28, 2019, the City was notified by Metro that the provisions of the CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County.

Metro 2009 Long Range Transportation Plan (LRTP). The 2009 LRTP includes funding for general categories of improvements, such as Arterial Improvements, Non-motorized Transportation, Rideshare and Other Incentive Programs, Park-and-Ride Lot Expansion, and Intelligent Transportation System (ITS) improvements for which Call for Project Applications can be submitted for projects in Los Angeles County. Metro also has a Short Range Transportation Plan to define the near-term (through year 2024) transportation priorities in Los Angeles County. In addition to the regional transportation plans, Metro has recently adopted a Complete Streets Policy and a First Last Mile Strategic Plan.

Metro Complete Streets Policy. Metro's recently adopted Complete Streets policy is reinforcing the California Complete Streets Act (AB 1358). Effective January 1, 2017, Metro is requiring that all local jurisdictions within Los Angeles County adopt a Complete Streets Policy, an adopted city council resolution supporting Complete Streets, or an adopted general plan consistent with the California Complete Streets Act of 2008 in order to be eligible for Metro capital grant funding programs, starting with the 2017 grant cycles.

Metro Short Range Transportation Plan (SRTP). The 2014 Metro SRTP is a 10-year action plan that guides future Metro programs and projects through 2024 and advances Metro towards the long-term goals identified in the 2009 Metro LRTP. The SRTP identifies the short-term challenges, provides an analysis of our financial resources, proposes action plans for the public transportation and highway modes, and includes other project and program initiatives. In addition, it addresses sustainability, future funding strategies, and lastly, measures the Plan's performance.[2]

[2] Los Angeles Metropolitan Transportation Authority, *2014 Short Range Transportation Plan*, 2014.

Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy and Regional Transportation Improvement Program. SCAG adopted the 2016-2040 RTP/SCS in April 2016. The RTP/SCS is a planning document required under state and federal statute that encompasses the SCAG region, including six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The RTP/SCS forecasts long-term transportation demands and identifies policies, actions, and funding sources to accommodate these demands. The RTP/SCS consists of the construction of new transportation facilities, transportation systems management strategies, transportation demand management and land use strategies. The RTIP, also prepared by SCAG based on the RTP/SCS, lists all of the regional funded/programmed improvements over a six-year period.

LOCAL

City of Los Angeles General Plan Framework and Safety Elements. The Citywide General Plan Framework (Framework), an element of the City of Los Angeles General Plan, is a guide for Community Plans to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. It provides a comprehensive strategy for accommodating long-term growth should it occur as predicted. Chapter 9 Infrastructure and Public Services of the Framework Element addresses fire prevention, fire protection and emergency medical services provided to the City. The Safety Element of the General Plan identifies existing police, fire, and emergency services and the service needs of the City of Los Angeles in the event of a natural disaster. The Safety Element goals, objectives, policies, and programs are broadly stated to reflect the comprehensive scope of the Emergency Operations Organization (EOO), which is the program that implements the Safety Element. The Framework and Safety Elements include goals, objectives, and policies that are applicable to emergency services.

Los Angeles Municipal Code (LAMC). LAMC Section 12.26 contains required Transportation Demand Management (TDM) and Trip Reduction Measures. TDM is defined as the alteration of travel behavior through programs of incentives, services, and policies, including encouraging the use of alternatives to single-occupant vehicles such as public transit, cycling, walking, carpooling/vanpooling and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks). Trip Reduction is defined as reduction in the number of work-related trips made by single-occupant vehicles. Specific requirements for developments of various sizes are summarized from the code below:

- Development in excess of 25,000 square feet of gross floor area shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest numbers of employees are likely to see it. The transportation information displayed should include, but is not limited to current routes and schedules for public transit serving the site; telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations; ridesharing promotion material supplied by commuter-oriented organizations; regional/local bicycle route and facility information; and a listing of on-site services or facilities that are available for carpoolers, vanpoolers, bicyclists, and transit riders.
- Development in excess of 50,000 square feet of gross floor area shall provide the above plus: (1) designated parking areas for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s); (2) one permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area; and (3) parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles and other amenities.

- Development in excess of 100,000 square feet of gross floor area shall provide the above plus: (1) a safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area; (2) sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development; (3) possible bus stop improvements; and (4) safe and convenient access from the external circulation system to bicycle parking facilities on-site.

City of Los Angeles Mobility Plan (MP) 2035. The City updated the Transportation Element of the City's General Plan, now referred to as Mobility Plan 2035 or MP 2035, to reflect policies and programs that lay the policy foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the City of Los Angeles. The MP 2035 and Final EIR were adopted on August 11, 2015. MP 2035 is compliant with the 2008 Complete Streets Act (AB 1358), which mandates that the circulation element of a city's General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

The goals and objectives of MP 2035 that are relevant to the Proposed Plan are as follows:

- **Safety First:** focuses on topics related to crashes, speed, protection, security, safety, education, and enforcement.
    - Objective: Vision Zero: Decrease transportation related fatality rate to zero by 2035.
- **World Class Infrastructure:** focuses on topics related to the Complete Streets Network (walking, bicycling, transit, vehicles, green streets, and goods movement), Great Streets, Bridges, Street Design Manual, and demand management.
    - Objective: Provide 95% on-time arrival reliability of buses traveling on the Transit Enhanced Network by 2035. Establish an off-peak 5-minute bus frequency on 25% of the Transit Enhanced Network by 2035.
    - Objective: Increase vehicular travel time reliability on all segments of the Vehicle Enhanced Network by 2035.
    - Objective: Maintain the Automated Traffic Control Surveillance and Control System (ATSAC) Communications Network.
- **Access for all Angelenos**: focuses on topics related to affordability, least cost transportation, land use, operations, reliability, demand management, and community connections.
    - Objective: Ensure that 90% of households are within one mile of the Transit Enhanced Network by 2035.
    - Objective: Ensure that 90% of all households have access within one-half mile of high quality bicycling facilities by 2035 (protected bicycle lanes, paths, and neighborhood enhanced streets).
    - Objective: Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.
- **Collaboration, Communication & Informed Choices:** focuses on topics related to real-time information, open source data, transparency, monitoring, reporting, emergency response, departmental and agency cooperation and data base management.
    - Objective: Install street parking occupancy-detection capability at 50% of on-street parking locations by 2035.
    - Objective: Implement coordinated wayfinding at all major transit stations by 2035.

- **Clean Environment and Healthy Communities:** focuses on topics related to environment, health, clean air, clean fuels and fleets, and open street events.
    - Objective: Decrease vehicle miles traveled (VMT) per capita by 5% every five years, to 20% by 2035.
    - Objective: Meet a 9% per capita GHG reduction for 2020 and a 16% per capita reduction for 2035 (SCAG RTP).
    - Objective: Reduce the number of unhealthy air quality days to zero by 2025.

California's Complete Streets Act (AB 1358) was signed into law in 2008 and mandates that complete street policies and standards be incorporated into a city's general plan. The idea behind Complete Streets is to make streets safe, comfortable, and convenient for people of all mode types. Mobility Plan 2035 also sets forth street designations and related standards in a Complete Street Design Guide. The Guide provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets, safety and accessibility. The Guide is not meant to supersede existing technical standards provided for in other City or national manuals. Rather, it is meant to supplement existing engineering practices and requirements in order to meet the goals of Complete Streets.

Due to specific site and operational characteristics associated with any given street, any proposed street improvement project must still undergo detailed technical analyses by the appropriate city departments. Overall, this Design Guide will indoctrinate the concept of Complete Streets into Los Angeles' present and future street design so that all stakeholders are able to plan for, implement, and maintain safe and accessible streets for everyone.

Great Streets for Los Angeles/LADOT Strategic Plan. In September 2014, the Mayor's Office and LADOT released the Great Streets for Los Angeles, LADOT's first strategic plan to turn the city's essential infrastructure -- its streets and sidewalks -- into safer, more livable 21st century public spaces that accommodate everyone who uses them. The plan builds upon Mayor Garcetti's Great Streets Initiative, which looks at Los Angeles's streets as valuable assets that can help revitalize neighborhoods across the City and make it easier for Angelenos to get around whether they walk, bike, drive, or take transit. The plan also stresses the importance of working closely with other city and regional agencies, such as the Bureau of Street Services and Metro, to improve safe, accessible transportation services and infrastructure.

The plan focuses on Mayor Garcetti's priorities of making the city safe, prosperous, and livable with a well-run government and includes the following key goals:

- **Vision Zero:** Eliminate traffic deaths by 2025 and design streets to increase the safety of pedestrians, including adding 100 new high-visibility continental crosswalks.
- **Great Streets:** Implement changes to the 15 Great Street corridors and launch programs to reduce dangerous speeding in residential neighborhoods. Increase bike infrastructure and launch a regional bikeshare program. Expand bus service and improve its quality and connectivity with surrounding neighborhoods.
- **A 21st Century DOT:** Streamline LADOT's operations to implement needed safety and mobility projects quickly and efficiently. Enhance technologies to manage traffic, meters, and parking operations.
- **World-Class Streets for a World-Class Economy:** Real-time traffic information and more efficient allocation of the street to support local foot traffic and better manage freight traffic. Build Great Streets for vibrant and prosperous neighborhood business districts.

Los Angeles Department of Transportation (LADOT). As part of project review, LADOT determines whether a project requires a traffic study and evaluates project site plans to ensure that they follow standard engineering practice and City design regulations. The department's Transportation Impact Study Guidelines includes the requirements related to elements such as driveway design, use of off-street parking, and loading facilities. These design related requirements are often imposed through zone changes, conditional use approvals, division of land or the traffic review process. In many cases it is necessary to clear these traffic requirements, i.e., certify that they have been carried out. This is done by LADOT's representative on the Subdivision Committee, who must approve any plans affected by such requirements.

Los Angeles Fire Department (LAFD) Strategic Plan. LAFD released its first Strategic Plan in 2015 and then followed up with another Strategic Plan (A Safer City 2.0), which covers the years 2018-2020.

The Strategic Plan 2015-2017 focuses on nine goals and corresponding strategic actions that guide the LAFD. The primary goals that are applicable to the Proposed Plan include providing exceptional public safety and emergency service and implementing and capitalizing on advanced technologies. Some of the key priorities associated with these goals include:

- Improving response times by utilizing data and metrics to identify gaps in LAFD's response strategies and exploring response time improvements through dialogue, cognitive inquiry, innovation, and follow-up;
- Delivery of emergency medical services by expanding LAFD Emergency Medical Service (EMS) response capabilities for special events and addressing period of high vehicle traffic; and
- Implementing advanced technologies by developing performance metrics, tracking standards, data collection, analysis and reporting procedures (FireStatLA).

The Strategic Plan also focuses on the development of an even more professional workforce and promotion of a positive work environment to address risk management issues and strengthening community relationships to improve preparedness and enhance resiliency during emergency events.

LAFD's Strategic Plan 2018-2020 states that more than 70% of the goals from the first Strategic Plan were completed through the collaboration of members and stakeholders, and the new 2018-2020 Plan focuses on these five guiding goals: 1) Provide Exceptional Public Safety and Emergency Service, 2) Embrace a Healthy, Safe and Productive Work Environment, 3) Capitalize on Advanced Technology, 4) Enhance LAFD Sustainability & Community Resiliency, and 5) Increase Opportunities for Personal Growth and Professional Development.

ENVIRONMENTAL SETTING

OVERVIEW

The Project Area is the Hollywood Community Plan Area (CPA), which is located in the City of Los Angeles approximately 2.5 miles northwest of downtown Los Angeles. The analysis evaluates the transportation network within the boundaries of the Project Area as well as the surrounding transportation network that could be potentially impacted by the Project. For the purposes of this EIR transportation impact analysis, Existing Conditions (baseline) is defined as Year 2016, which corresponds to the date of the release of the Notice of Preparation (NOP).

Hollywood, like many other urban regions throughout the country, experiences significant traffic congestion. Despite an extensive street network and transit options, vehicular circulation continues to deteriorate due to historical over-reliance on the car as the primary mode of transportation. The combination

of many regional destinations, oversaturated roadways, and unreliable travel times for autos and bus transit underlie the need for creating a transportation network for the Project Area that will better serve all modes of transportation, improve the efficiency of the overall system, and enhance the livability along major boulevards.

The Project Area is served by a network of grid system of arterials, except in areas north of Franklin Avenue, where the road network becomes increasingly curvilinear into the hills. Rapid and local bus transit lines operate on most major and minor arterials. Pedestrian facilities primarily consist of sidewalks adjacent to roadways, and a limited bicycle network is provided. The transportation network in the Project Area is primarily auto- and bus transit-oriented.

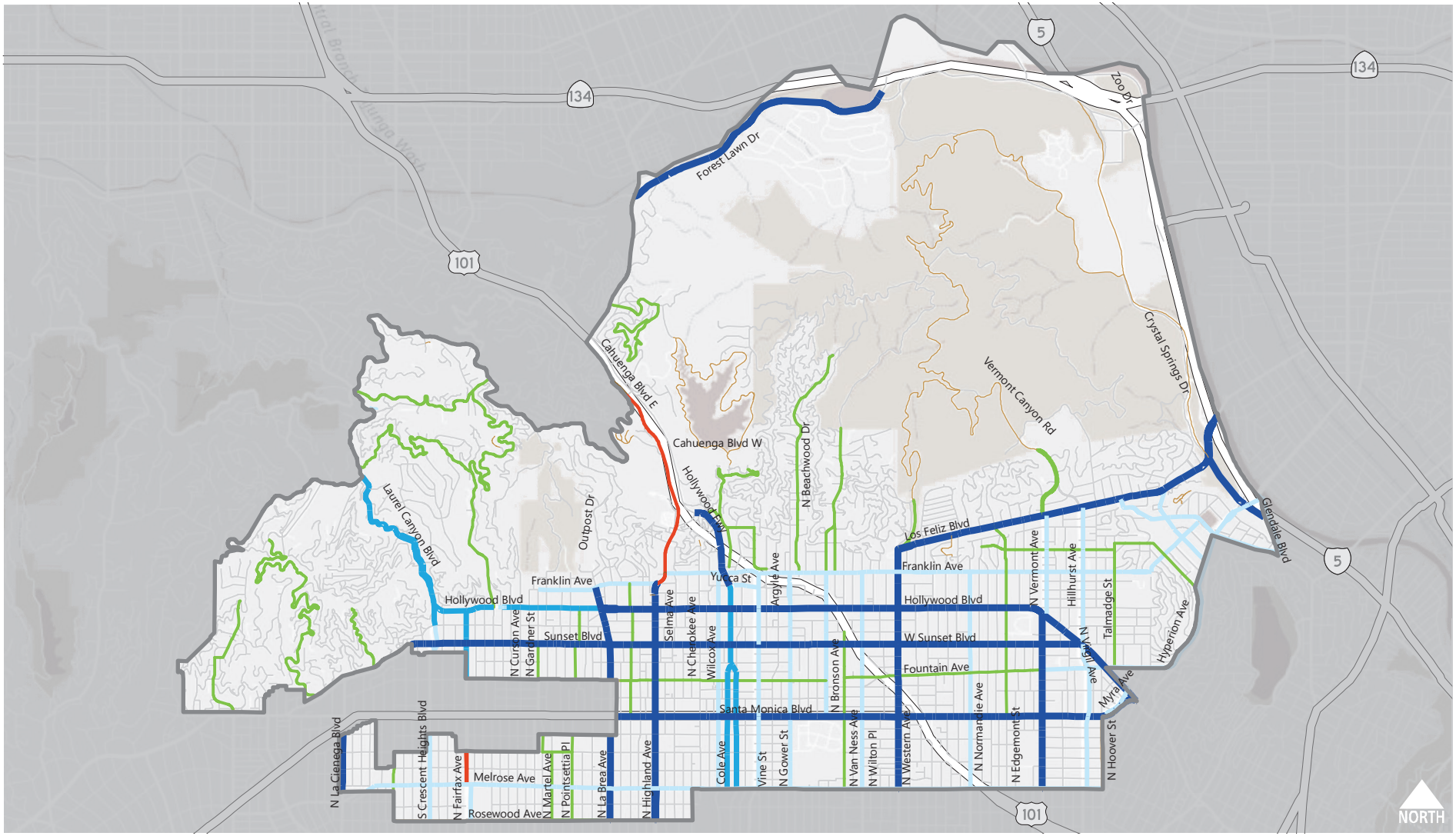
Regional access is provided by the Ventura Freeway (US-101 and SR-134) and the Santa Ana Freeway (I-5). There are several key Boulevards and Avenues including Western Avenue, Normandie Avenue, Vermont Avenue, Cahuenga Boulevard, Highland Avenue, La Brea Boulevard, Fairfax Avenue and Crescent Heights Boulevard, which generally run north-south; and Franklin Avenue, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard and Melrose Avenue, which generally run east-west. The Project Area is also served by collector and local streets.

HIGHWAY AND STREET SYSTEM

The roadway network in the Project Area ranges from major freeways, such as US-101, SR-134 and I-5, to neighborhood-serving local roadways. **Figure 4.15-1** displays the roadways within the Project Area and illustrates the classification of roadway facilities. Below is a brief description of the facility types in the City's MP 2035 and Complete Streets Design Guide, including those identified on **Figure 4.15-1**.[3]

- **Boulevard I (Major Highway Class I).** Boulevard I streets are generally defined as having three to four lanes in each direction along with a median turn lane. The width of a Class I Boulevard is usually 100 feet, with a typical sidewalk width of 18 feet and a target operating speed of 35 miles per hour (mph).
- **Boulevard II (Major Highway Class II).** Boulevard II streets are generally defined as having two to three lanes in each direction along with a median turn lane. The width of a Class II Boulevard is usually 80 feet, with a typical sidewalk width of 15 feet and a target operating speed of 35 mph.
- **Avenue I (Secondary Highway).** Avenue I streets typically have one to two lanes in each direction, a roadway width of 70 feet, and a normal sidewalk width of 15 feet and a target operating speed of 35 mph. An Avenue I typically includes streets with a high amount of retail uses and local destinations.
- **Avenue II (Secondary Highway).** Avenue II streets usually have one to two lanes in each direction, with a typical roadway width of 56 feet, a typical sidewalk width of 15 feet and a target operating speed of 30 mph. Such streets are typically located in parts of the City with dense active uses, and a busy pedestrian environment.
- **Avenue III (Secondary Highway).** Avenue III streets are defined to have one to two lanes in each direction, with a roadway width of 46 feet, a normal sidewalk width of 15 feet, and a target operating speed of 25 mph. This classification was developed to maintain roadway width in older, more historic parts of the City.

[3]City of Los Angeles, *Complete Streets Design Guide*, adopted August 11, 2015, https://losangeles2b.files.wordpress.com/2015/05/2015_csdg_web-4-22.pdf.



Road Classifications

- Avenue I
- Avenue II
- Avenue III
- Boulevard II
- Collector
- Local Street
- Private

SOURCE: Mobility Plan 2035, 2016; Fehr & Peers, 2019.

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FIGURE 4.15-1

ROADWAY NETWORK

- **Collector Street.** Collector Streets generally have one travel lane in each direction, with a roadway width of 40 feet and a sidewalk width of 13 feet. The target operating speed for Collector Streets is 25 mph. Such streets are typically intended for vehicle trips that start or end in the immediate vicinity of the street.
- **Industrial Collector Street.** Industrial Collector Streets vary from normal collector streets in that larger curb returns are incorporated to allow for the wider turning radii of trucks.
- **Local Street Standard.** Local Street Standard roadways typically have one lane in each direction, and are designed to have a 36-foot width, 12-foot sidewalks, and a target operating speed of 20 mph. Such streets are not designed for through traffic; rather, their focus is to allow access to and from destination points. Unrestricted parking is typically available on both sides of the street.
- **Local Street Limited.** Local Street Limited roadways typically have one lane in each direction, and are designed to have a 30-foot width, 10-foot sidewalks, and a target operating speed of 15 mph.
- **Industrial Local Street.** Although similar to the normal local streets, Industrial Local Streets differ primarily in width for the purpose of providing adequate space for trucks to maneuver. The typical roadway width for an Industrial Local Street is 44 feet, with 10-foot sidewalks and a target operating speed of 20 mph.

Signalized Intersections and Traffic Control Devices. The City of Los Angeles' Automated Traffic Surveillance and Control (ATSAC) System is a computer-based traffic signal control system that monitors traffic conditions and system performance to allow ATSAC operations to manage signal timing to improve traffic flow conditions. This system allows monitoring and control of the signal from a central Traffic Operations Center at City Hall. The importance of linking to the ATSAC System is the ability to coordinate the signals in relationship with other signals along a travel corridor. Signal coordination minimizes delay due to stops and enhances vehicle flow. Studies by LADOT and independent third parties have shown that the ATSAC system reduces congestion and increases average travel speeds.[4] The Adaptive Traffic Control System (ATCS) is an enhancement to ATSAC and provides fully traffic-adaptive signal control based on real-time traffic conditions. In addition, LADOT staff can manually adjust traffic signals remotely from the department's command center to respond to collisions, weather, special events, and other emergencies. All signalized intersections in the Project Area are currently operating under the City's ATSAC System and ATCS.

EXISTING TRAFFIC OPERATIONS

This section presents existing traffic conditions by applying the newly approved method of studying Vehicle Miles Traveled (VMT) to evaluate significant traffic impacts under CEQA. VMT is a measure of the number of miles being driven within a defined area, and are based on the number of Vehicle Trips (VT) multiplied by the average trip lengths (in miles) for various trip types. The vehicle-trip generation estimated by the Travel Demand Forecasting (TDF) model was categorized according to the origin and destination of each trip. Internal-to-internal (II) trips remain within the Plan Area. Internal-to-external (IX) trips originate within the Plan Area and terminate at an outside destination. External-to-internal (XI) trips originate outside the Plan Area and terminate within it. The VMT calculation accounts for all internal (II) trips and trips that begin or end (IX or XI) within the Plan Area, as these trips are generated by or attracted to land uses within the Hollywood CPA. To obtain an average VMT per service population, the total VMT is divided by the total population and employees within the area of analysis. The section that follows provides a brief summary of these characteristics for the City of Los Angeles, and provides a detailed summary of these

[4]LADOT, *Los Angeles Signal Synchronization Fact Sheet*, February 14, 2016, http://ladot.lacity.org/sites/g/files/wph266/f/LADOT%20ATSAC%20%26%20Signals%20_%20Fact%20Sheet%202-14-2016.pdf, accessed July 27, 2017.

characteristics for the Community Plan Area (CPA). For more information on the use of VMT as an impact threshold, see the *Thresholds of Significance* section.

Table 4.15-1 summarizes the Existing Conditions for the Hollywood CPA and presents the model estimates of vehicle mode split for automobiles, transit, bicycles and walk trips. According to model estimates, approximately 23 percent of all trips within the Plan Area are made by transit, walking or biking. This is consistent with recent U.S. Census Bureau data, which found that 24 percent of Hollywood area residents use non-automobile methods (transit/bike/walk/other) on their journey to work as compared to approximately 17 percent citywide.

TABLE 4.15-1: 2016 MODE SPLIT

Travel Mode	Plan Area Percentage (%)
Automobile	77%
Non-Automobile (transit/bike/walk)	23%

Note: U.S. Census Bureau, *2011-2015 American Community Survey 5-Year Estimates Table S0801 Commuting Characteristics by Sex.*
SOURCE: Fehr & Peers, *Hollywood Subarea TDF Model*, 2019.

VMT is reported as Total Daily VMT per Service Population, which equates to all VMT for the Plan Area divided by the number of people living and working within the Plan Area. For more information on the use of VMT and service population, see the *Thresholds of Significance* section. **Table 4.15-2** summarizes the daily vehicle trips and VMT generated by the Plan Area. The daily VMT generated by uses within the Plan Area is approximately 5.6 million miles, which equates to 18.3 VMT per service population. Service population is the sum of population and employment. **Table 4.15-3** summarizes the daily vehicle trips and VMT region-wide based on the 2016 SCAG TDF model. As shown, the SCAG region VMT per service population is approximately 90 percent higher than the Plan Area's VMT per service population.

TABLE 4.15-2: 2016 DAILY VEHICLE TRIPS AND VEHICLE MILES TRAVELED GENERATED BY PLAN AREA

Transportation Metrics	Plan Area Daily Total
Vehicle Trips (VT)	706,000
Total Vehicle Miles Traveled (VMT)	5,624,000
Vehicle Miles Traveled per Service Population	18.3

SOURCE: Fehr & Peers, *Hollywood Subarea TDF Model*, 2019.

TABLE 4.15-3: 2016 SCAG REGIONWIDE DAILY VEHICLE TRIPS AND VEHICLE MILES TRAVELED

Transportation Metrics	SCAG Region Daily Total
Vehicle Trips (VT)	82,283,000
Total Vehicle Miles Traveled (VMT)	948,656,000
Vehicle Miles Traveled per Service Population	35.4

SOURCE: Fehr & Peers, *SCAG 2016 RTP Model*, 2019.

Another way to understand existing traffic conditions is to study existing traffic volumes with an analysis of the operating conditions, indicated through volume-to-capacity (V/C) ratios and Level of Service (LOS). LOS was the commonly used metric until the new method of studying VMT was recently approved. LOS is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A (free-flow traffic conditions with little or no delay) to overloaded conditions at LOS F (traffic flows exceed design capacity resulting in extensive vehicle queues and delays). LOS can be determined by dividing the number of vehicles (i.e., volume (V)) by roadway capacity (C), and the resulting V/C ratio is then used to obtain the corresponding LOS. To determine the operations of the roadway network during peak commute hours, a LOS analysis was conducted for the roadways in the Plan Area.

As discussed under Special Event Traffic Operations below, special events in Hollywood frequently require partial or full closure of Hollywood Boulevard in the Project Area, including sidewalks and crosswalks, for periods of several hours to several days at a time. The data collection effort for the Existing Conditions assessment included traffic counts recorded by the Regional Integration of ITS Projects (RIITS) during the months of February, March, April and May on a Tuesday, Wednesday and Thursday. These periods represent typical traffic conditions, with schools in session and the least likelihood of a holiday or long-weekend related change compared to normal traffic patterns. The available traffic count data was post-processed to calculate the average hourly volumes for the Existing Conditions analysis. Time periods with no volume data due to roadway closures were not included in the average hourly volumes. To the extent that event traffic occurred on a weekday (Tuesday, Wednesday or Thursday) between February and May 2016, these travel demands are accounted for when calculating the average hourly volumes within the Plan Area.

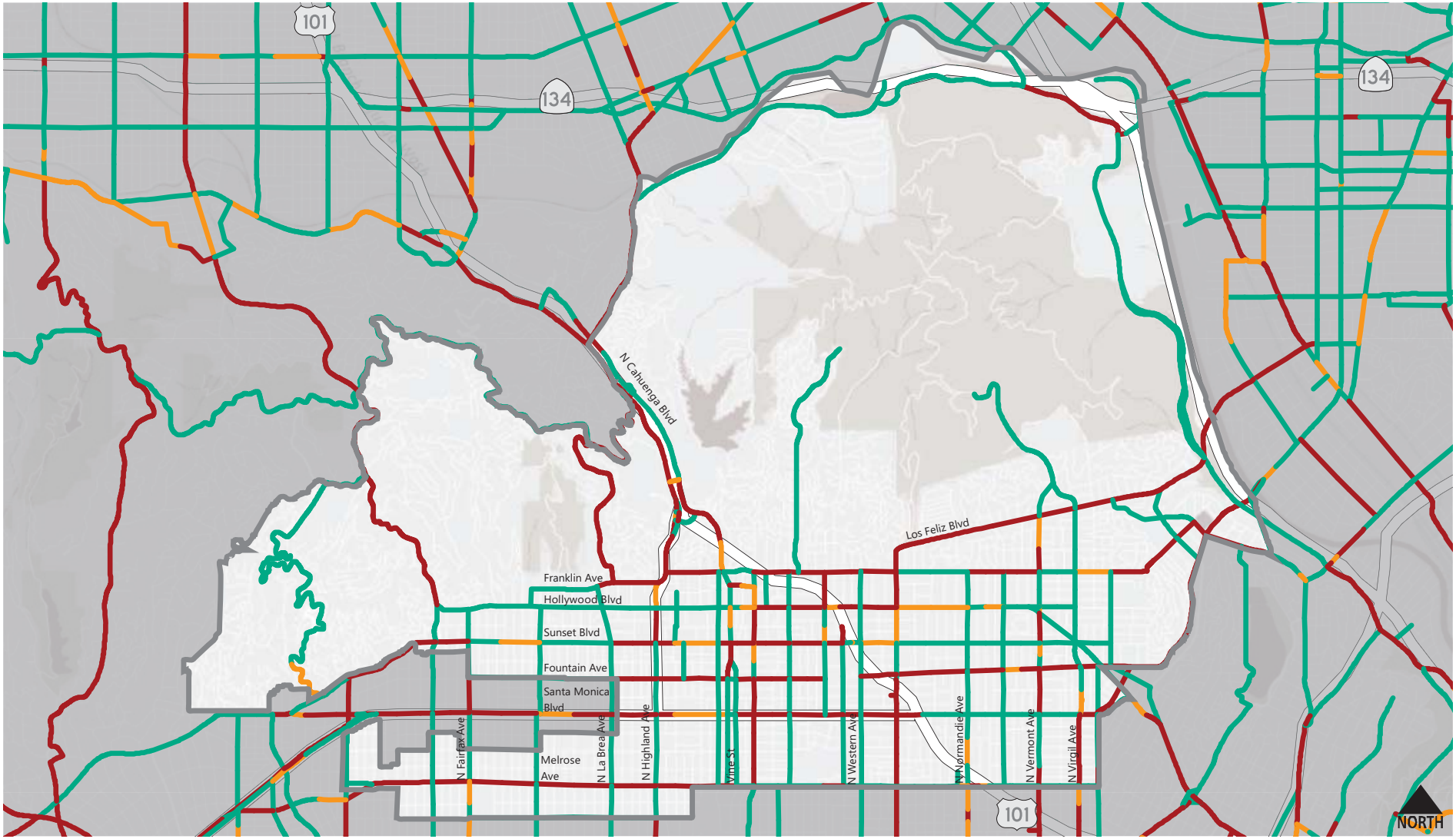
See **Table 4.15-5** and accompanying text, in the Methodology discussion below, for a description of LOS A through F, and discussion for weighted average V/C.

Figure 4.15-2 and **Figure 4.15-3** illustrate the AM Peak Period LOS and PM Peak Period LOS, respectively. It should be noted that because traffic volumes are a result of the collective travel choices of thousands of individual drivers, variation in the daily and peak period volumes on any given facility is both expected and observed. The Federal Highway Administration (FHWA) guidelines recommend traffic models are calibrated to within 7 to 15 percent for freeway and arterial volumes to account for this regular variation. This range is based on studies that show that this range represents the average daily fluctuation in traffic for major roadways. Accordingly, the estimates of both existing and future conditions are subject to regular variation due to fluctuations in travel demand (or the travel choices of the thousands of individual drivers using the Project Area roadways).

The number of travel lanes on roadways within the Project Area are displayed in **Figure 4.15-4**. The number of travel lanes on several roadways, such as Los Feliz Boulevard, Sunset Boulevard, Santa Monica Boulevard increase by one travel lane in each direction during peak travel periods due to on-street parking restrictions; these street segments are indicated on **Figure 4.15-4**. The peak hour lane capacities were used to determine roadway segment operations during morning and evening commute periods.

The LOS of the study corridors was determined based on the V/C ratio using the Hollywood Subarea TDF Model.[5] This ratio was calculated by comparing peak hour traffic volumes to the roadway capacity for each facility. The roadway capacities reflect the operating characteristics of the study corridors, such as functional classifications, number of lanes, and travel speeds. Functional classification is a scale that determines the vehicles-per-lane-per-hour capacity; higher classifications generally have more and wider lanes and are designed to facilitate a higher volume of vehicles per hour.

[5]Fehr & Peers, *Hollywood Community Plan Model Development Report*, 2016.



Segment Level of Service

- Acceptable Operations (V/C < 0.80)
- Approaching Capacity (V/C 0.80 - 0.90)
- Approaching or Over Capacity (V/C > 0.90)

SOURCE: Fehr & Peers, 2019.

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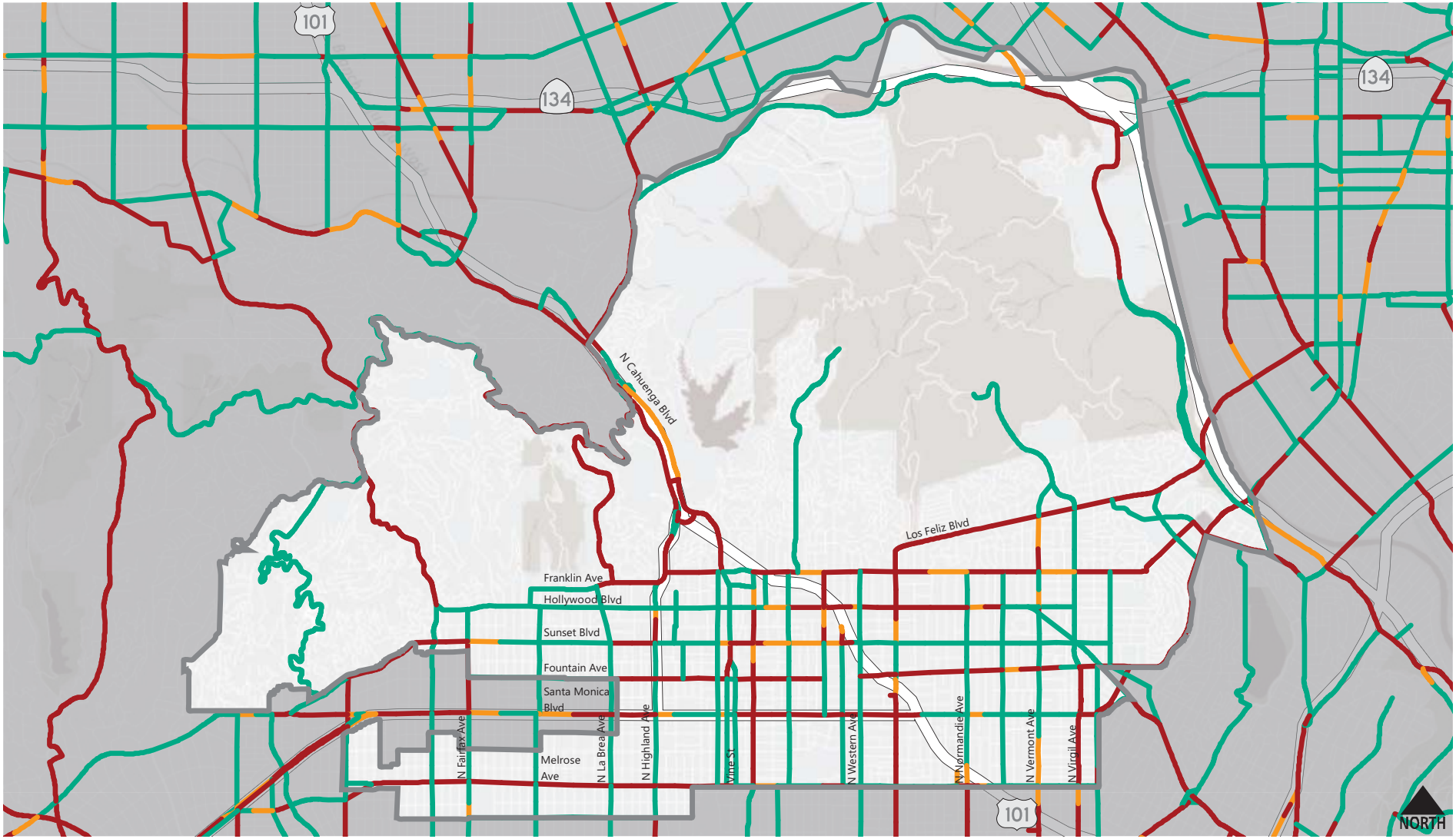
FIGURE 4.15-2

AM PEAK PERIOD LEVEL OF SERVICE:
2016 EXISTING CONDITIONS



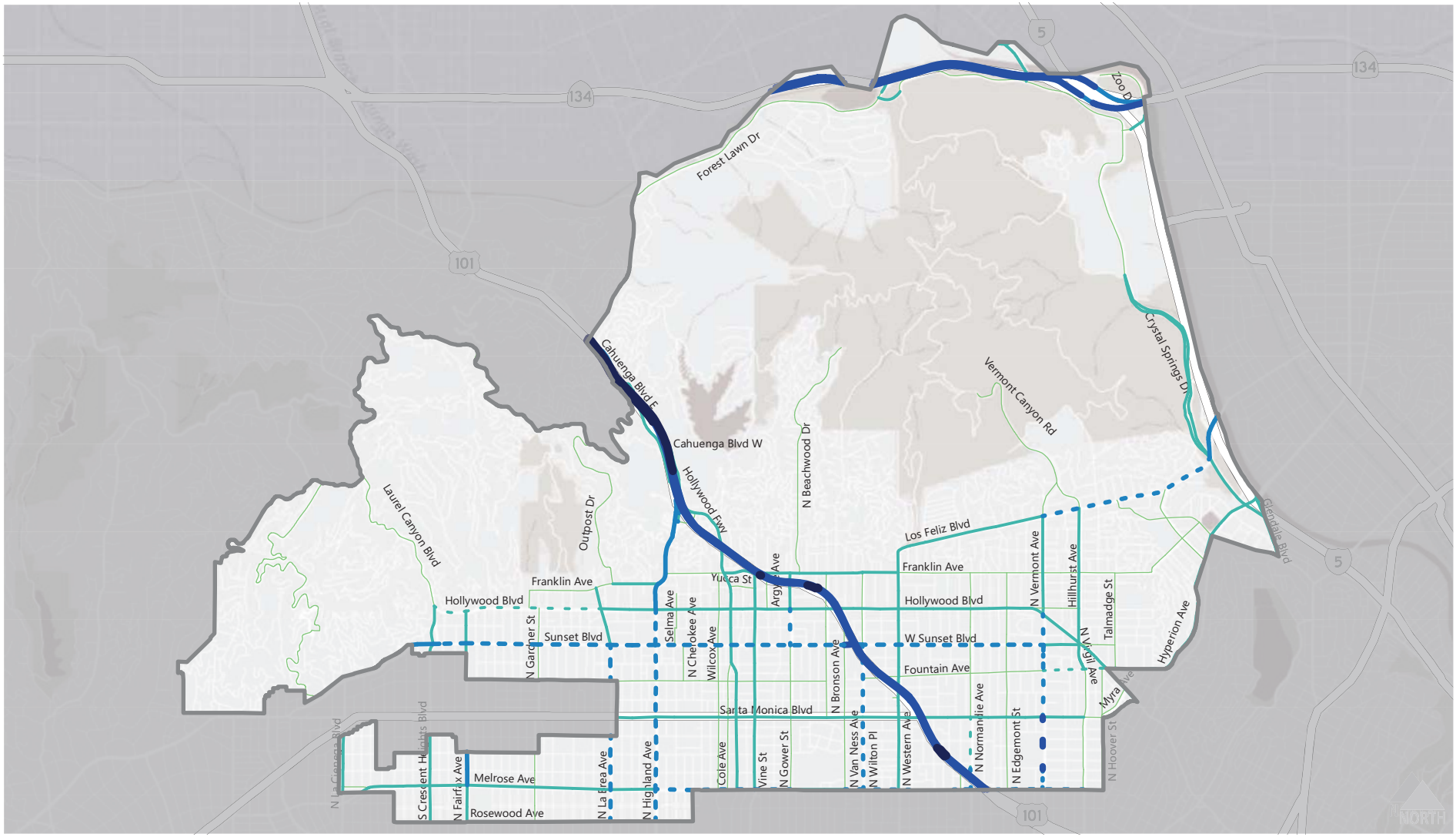
Segment Level of Service

- Acceptable Operations (V/C < 0.80)
- Approaching Capacity (V/C 0.80 - 0.90)
- Approaching or Over Capacity (V/C > 0.90)

SOURCE: Fehr & Peers, 2019.

FIGURE 4.15-3

PM PEAK PERIOD LEVEL OF SERVICE:
2016 EXISTING CONDITIONS



Number of Lanes on Road in Each Direction During Peak Period

0 - 1 | 2 | 3 | 4 | 5 - 7

Road segments with a dashed line have peak period parking restrictions in order to accomodate an additional travel lane

SOURCE: Fehr & Peers, 2019.

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FIGURE 4.15-4

EXISTING ROADWAY NETWORK CAPACITY

Table 4.15-4 summarizes the typical travel conditions for the roadway network (using a weighted average V/C ratio) and the percentage of roadway segments operating at LOS E or F. The weighted average V/C ratio represents typical travel conditions for the roadway network in the Project Area.

TABLE 4.15-4: EXISTING 2016 ROADWAY SEGMENT LEVEL OF SERVICE (LOS)

Transportation Metrics	Analyzed Time Period	
	AM Peak Period	PM Peak Period
Weighted Average V/C	0.876 (LOS D)	0.890 (LOS D)
Percentage (%) of Street Segments at LOS E or F	37%	37%
WEIGHTED AVERAGE V/C BY FACILITY TYPE		
Avenue	1.165 (LOS F)	1.186 (LOS F)
Boulevard / Parkway	0.862 (LOS D)	0.870 (LOS D)
Local / Collector	0.840 (LOS D)	0.922 (LOS E)

SOURCE: Fehr & Peers, *Hollywood Subarea TDF Model*, 2016.

Approximately 37 percent of the roadways operate at LOS E or F during either peak period. The weighted average V/C ratio is 0.876 (LOS D) in the AM peak period and 0.890 (LOS D) in the PM peak period. As a general matter, this means a little more than a third of road network (Avenues, Boulevards, and Local/Collector streets) in the Hollywood area experiences substantial delay during the peak period, and overall the network is approaching the limits of its capacity.

RELIABILITY

The traffic volume, travel time, and LOS results presented in this section reflect typical weekday (Tuesday through Thursday) conditions within the Project Area without major incidents and under mild weather conditions. Atypical traffic conditions, such as a collision on the US-101, rainy weather or a special event, can impact travelers in the Project Area. The reliability of the roadway network can be impacted by these occurrences and is a common frustration for drivers. The bus transit system can also be affected by these events.

EMERGENCY ACCESS

California state law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. Generally, multi-lane roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. Within the Project Area, multi-lane roadways running north-south include Western Avenue, Normandie Avenue, Vermont Avenue, Cahuenga Boulevard, Highland Avenue, La Brea Boulevard, Fairfax Avenue and Crescent Heights Boulevard. Roadways running east-west include Franklin Avenue, Hollywood Boulevard, Fountain Avenue, Sunset Boulevard, Santa Monica Boulevard and Melrose Avenue. Additionally, the US-101, SR-134 and I-5 provide emergency access to and from locations within the Project Area. In addition, the LAFD in collaboration with LADOT has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles travelling on designated streets in the City.[6]

Within the City of Los Angeles, fire prevention and suppression and emergency medical services are provided by the LAFD. Public protection service and law enforcement are provided by LAPD. New development projects in the City may increase the demand for fire protection and emergency medical

[6]LADOT, *ATSAC Fact Sheet*, http://ladot.lacity.org/what-we-do/operations/signal-synchronization0.

services, and the LAFD evaluates new project impacts on a project-by-project basis. Consideration is given to project size and components, required fire-flow, response time and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials.[7] The adequacy of emergency service may be influenced by factors such as staffing levels, emergency response times, technology improvements, management strategies, and mutual aid agreements. Every year, LAFD assesses its resources and reallocates them based on demand and need citywide. The provision of new fire stations varies as a function of not only the geographic distribution of physical stations but also due to the availability of fire trucks, ambulances, and other equipment as well as access to reciprocal agreements with neighboring jurisdictions. The City requires that development plans be submitted to the City for review and approval to ensure that new development has adequate access, including driveway access and turning radius in compliance with existing City regulations.[8]

Table 4.15-5 identifies the existing fire stations in the Plan Area and provides the 2016 average response times for Non-EMS and EMS calls. See **Figure 4.14-1** in Section 4.14 Public Services of the EIR for the map of the fire stations.

TABLE 4.15-5: LAFD FIRE STATIONS SERVING THE PROJECT AREA

Fire Station	Address	LAFD Community	2016 Average Response Times (mins) /a/		Staffing	Service and Equipment
			Non-EMS	EMS		
27	1327 N. Cole Ave. Los Angeles, CA 90028	Hollywood	5:40	6:23	15	• Task Force Truck • Ambulance Unit • Urban Search & Rescue
35	1601 N. Hillhurst Ave. Los Angeles, CA 90027	Los Feliz	5:56	6:02	12	• Truck Company • Engine Company • Ambulance Unit
41	1439 N. Gardner St. Los Angeles, CA 90046	Hollywood (North Hills & Northwest)	7:11	6:45	8	• Truck Company • Engine Company • Ambulance Unit
52	4957 Melrose Ave. Los Angeles, CA 90029	Hollywood (Southeast)	6:04	6:18	7	• Engine Company • Ambulance Unit
56	2759 Rowena Ave. Los Angeles, CA 90039	Silver Lake	7:28	7:29	4	• Engine Company • Ambulance Unit • Heavy Rescue
76	3111 N. Cahuenga Blvd. Los Angeles, CA 90068	Cahuenga Pass	7:38	7:46	4	• Engine Company • Ambulance Unit
82	5769 Hollywood Blvd. Los Angeles, CA 90028 (West Bureau Headquarters)	Hollywood (Hills & Northeast)	6:31	6:11	6	• Engine Company • Ambulance Unit

Note: Non-EMS = fire and other services; EMS = Emergency Medical Services
/a/ Average response metrics for January-December 2016.
SOURCE: LAFD, *FireStatLA*, www.lafd.org, Navigate LA; TAHA, 2017, 2019.

[7]City of Los Angeles, *CEQA Thresholds Guide*, 2006, page K.2.2.
[8]LAMC Section 12.21.A.5 "Design of Parking Facilities".

PUBLIC TRANSIT SERVICE

Metro's Red Line subway provides high-speed local and regional transit connections both with the San Fernando Valley and downtown Los Angeles, including a direct connection to Union Station. Other public transit service within the Project Area consists primarily of local bus services linking riders to localized businesses and destinations. A relatively dense network of buses provides local access as well as first/last-mile connections to the Red Line subway stations. Pedestrian access to transit in Hollywood tends to rank near the average for major transit stops/stations in Los Angeles County, with an average rating of 91 out of 100, as reported by WalkScore.com.[9] Bicycle access to major transit stops in the area is less robust, falling well below the countywide average and receiving an average score of 61 out of 100, as reported by WalkScore.com.

Services are provided by multiple transit operators, including Metro and LADOT Downtown Area Short Hop (DASH) and Commuter Express; headways can be as frequent as 15 minutes or less. **Figure 4.15-5** shows transit service coverage in the Hollywood Project Area.

Below are brief descriptions of the transit operators that provide service within the City:

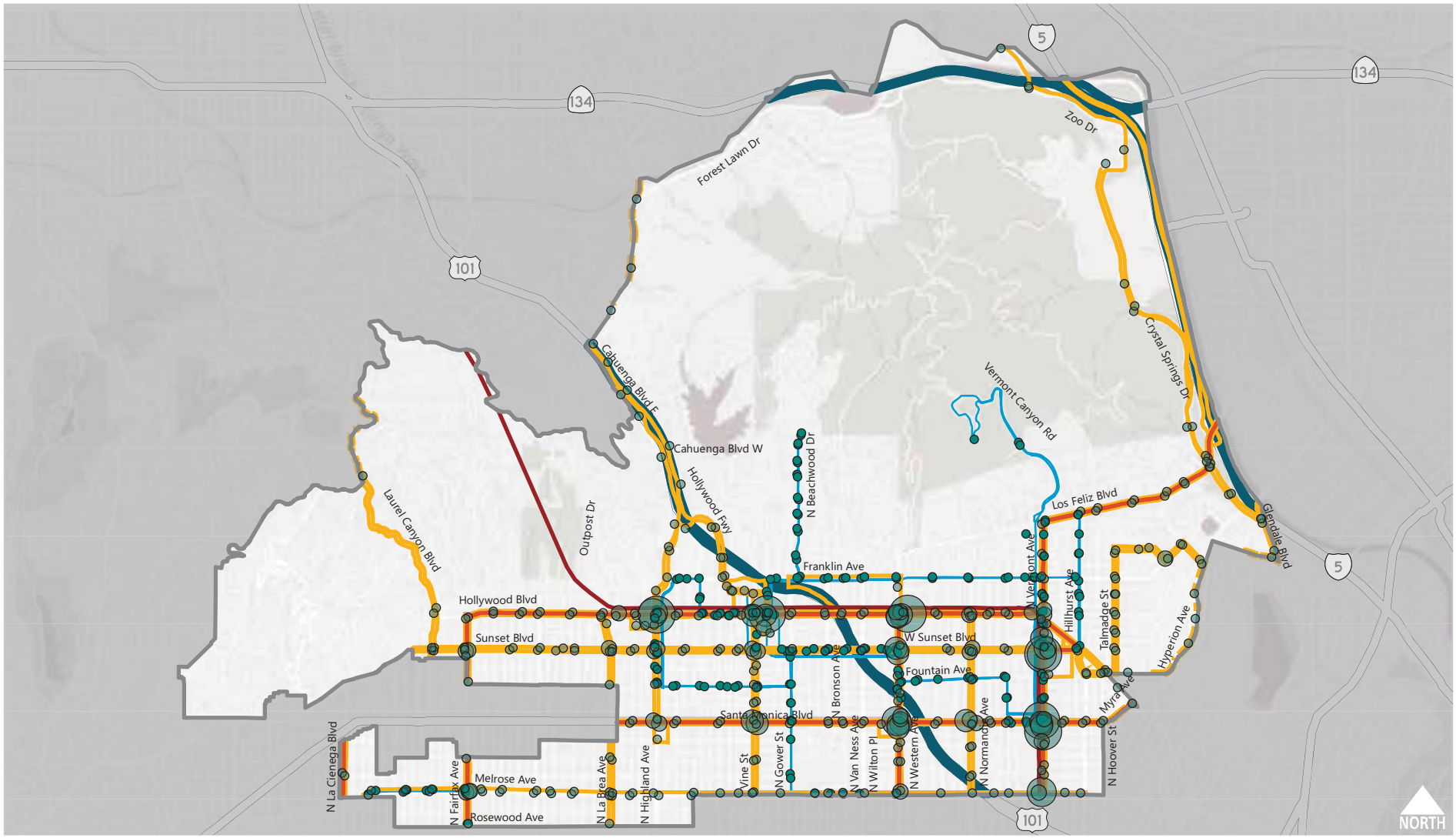
Los Angeles County Metropolitan Transportation Authority (Metro). Metro is the primary transit operator in Los Angeles County, providing bus, light rail, and subway services. There are two Metro heavy rail lines (Red and Purple), four Metro light rail lines (Blue, Green, Gold, Expo Phase 1) and two bus rapid transit (BRT) lines (Orange and Silver) operating in exclusive rights-of-way. Bicycles are allowed in designated areas on Metro trains at no extra charge at all times. Metro also operates approximately 180 bus routes in mixed traffic. These bus services vary considerably in speed, frequency and capacity. Buses are equipped with two bicycle racks at the front of the bus, and bicyclists are allowed to load their bicycles on the rack when there is space available at no extra charge. If the rack is full, bicyclists are asked to wait for the next bus.

The following Metro lines currently provide transit service in and through the Project Area:

- Metro Red Line (subway)
- Metro Rapid Lines
  - 704
  - 705
  - 754
  - 757
  - 780
- Metro Local Lines
  - 2
  - 4
  - 10
  - 92
  - 96
  - 105
  - 175
  - 180
  - 201
  - 204
  - 206
  - 207
  - 210
  - 212
  - 217
  - 218
  - 222
  - 237

Los Angeles Department of Transportation (LADOT). LADOT provides local and commuter express bus services in the City of Los Angeles. DASH operates 32 community circulator routes covering downtown Los Angeles and many outlying communities within the City. The Commuter Express operates 14 routes, making a limited number of stops and transporting passengers between downtown Los Angeles and other major centers within the City. Most Commuter Express routes operate during the peak hours only in the peak direction.

[9]Fehr & Peers, *Metro Active Transportation Strategic Plan*, April 2016.



Daily Ridership by Stop

- 0 - 250
- 250 - 500
- 500 - 1,000
- 1,000 - 2,000
- 2,000+

Transit Lines

- Metro Red Line
- Metro Rapid Bus
- Metro Local Bus
- LADOT DASH
- LADOT Commuter Express

SOURCE: METRO, LADOT, 2016.

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FIGURE 4.15-5

EXISTING TRANSIT SERVICE & RIDERSHIP

LADOT buses are equipped with three bicycle racks at the front of the bus, and bicyclists are allowed to load their bicycles on the rack when there is space available at no extra charge. If the rack is full, bicyclists are asked to wait for the next bus. The following LADOT services operate within and through Hollywood Project Area:

- Commuter Express 422
- DASH Beachwood Canyon
- DASH Fairfax
- DASH Hollywood
- DASH Hollywood/Wilshire
- DASH Los Feliz
- DASH Weekend Observatory Shuttle

West Hollywood CityLine X. The City of West Hollywood operates the "CityLine X" public transit route, a peak-period service connecting West Hollywood with the Metro Red Line station at Hollywood and Highland. Service operates weekdays between 7:00 a.m. and 9:00 a.m. and 5:30 p.m. to 7:00 p.m. every 15-20 minutes. The route includes local stops in West Hollywood along Santa Monica Boulevard.

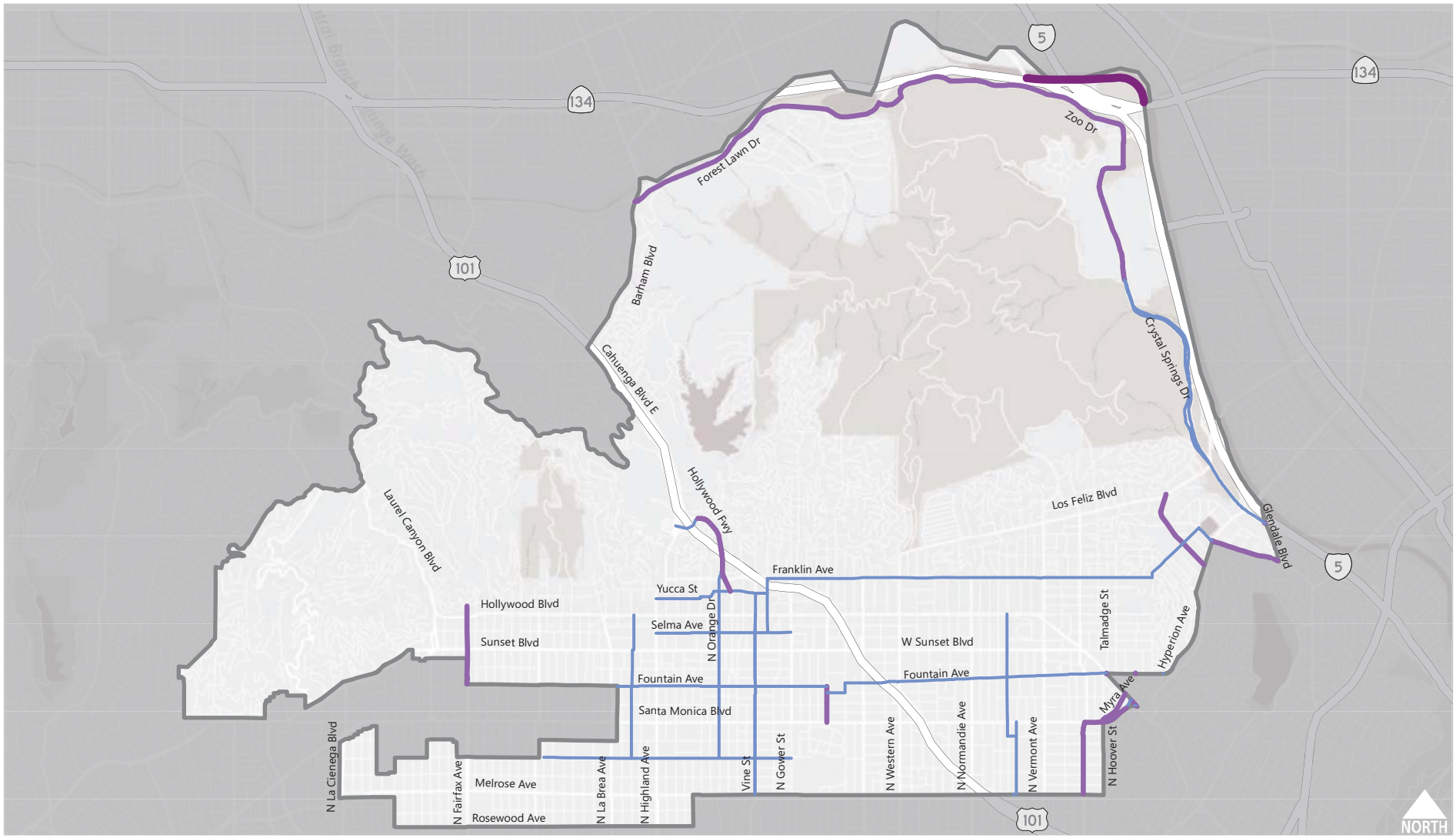
BICYCLE AND PEDESTRIAN FACILITIES

The Project Area consists of a modest network of bicycle facilities; pedestrian facilities primarily consist of sidewalks adjacent to roadways. Pursuant to the California Vehicle Code, bicycles are allowed on any street within the local street system. Pursuant to Los Angeles City Code, bicycles are also allowed on the sidewalk (LAMC Section 56.15). Most roadways are aligned on a grid system providing multiple route options for traveling throughout the Project Area.

Bicycle facilities are defined as off-street bicycle paths (Class I), on-street signed and striped bicycle lanes (Class II), on-street signed bicycle routes (Class III), and protected bicycle lanes or cycle tracks (Class IV). The design features of the various types of bicycle facilities are summarized below:

- **Bicycle Path:** A paved pathway separated from motorized vehicular traffic by an open space or barrier and either within the highway rights-of-way or within an independent alignment. Bicycle paths may be used by bicyclists, skaters, wheelchairs users, joggers, and other non-motorized users. Caltrans refers to this facility as Class I Bikeway, which "provides a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flow of motorists minimized."
- **Buffered Bike Lanes:** Buffered bicycle lanes provide on-street right-of-way in the form of a painted buffer that directs motorists to travel away from the bike lane and provides room for bicyclists to pass another bicyclist without entering the adjacent motor vehicle travel lane. A buffered bicycle lane is considered a Class II bikeway.
- **Bicycle Lane:** A striped lane for 1-way bicycle travel on a street or highway. Caltrans refers to this facility as a Class II bikeway.
- **Bicycle Route:** is a shared roadway specifically identified for use by bicyclists, providing a superior route based on traffic volumes and speeds, street width, directness, and/or cross-street priority, denoted by signs only. Caltrans refers to this facility as a Class III Bikeway.
- **Protected Bicycle Lane (Cycle Track):** A bicycle lane that provides further protection from other travel lanes with a physical roadway intervention. This is considered a Class IV Bikeway.

Within the Project Area, there are several existing bicycle facilities in addition to bicycle racks provided at various public and private locations throughout the Project Area. **Figure 4.15-6** shows the locations of the existing bicycle facilities within the Project Area.



Bicycle Facilties

- Class I (Bicycle paths)
- Class II (Bicycle lanes)
- Class III (Bicycle routes/bicycle friendly streets)

SOURCE: LADOT, 2016.

FIGURE 4.15-6

EXISTING BICYCLE NETWORK

The pedestrian network includes sidewalks, crosswalks, and curb ramps, as well as pedestrian amenities such as street trees and benches in some areas. Similar to many areas in the City, the Project Area has an aging network of pedestrian facilities including sidewalks of varying widths and wide crosswalks at most major intersections. Many areas have pedestrian-friendly features such as curb-side parking, and traffic signal modifications to ensure longer pedestrian crossing times, where warranted. Conditions vary widely in terms of sidewalk condition, pavement marking visibility, and obstructions in the sidewalk realm. An estimated 42 percent of the City's 10,750 miles of sidewalks are in disrepair.[10]

In 2015, as part of the Great Streets program, the City reconfigured the Hollywood Boulevard/Highland Avenue intersection to include an exclusive pedestrian signal phase in which all vehicular movement is prohibited. This configuration is also known as a "pedestrian scramble" and improves safety for pedestrians as well as optimizing traffic operations at an intersection with high volumes of pedestrians and turning vehicles.

In April 2015, the City of Los Angeles agreed to spend $1.3 billion over the next 30 years to fix sidewalks throughout the City and produce two reports per year to document its progress in repairing substandard sidewalks.

SPECIAL EVENT TRAFFIC OPERATIONS

Citywide Special Event Traffic Operations

Special events, such as the Los Angeles Marathon, AIDS/Lifecycle bike ride, CicLAvia, weekly farmers' markets, organized marches, races, block parties and similar events, frequently require partial or full closure of city streets, including sidewalks and crosswalks, for periods of several hours to several days at a time.

Hollywood Community Plan Area Special Event Traffic Operations

Additional information is provided below regarding special events that occur in Hollywood. The description of special events is intended to provide an overview of the various activities that occur in Hollywood to illustrate the robust levels of activity and events in the area and is not meant to be an exhaustive list of all current or potential future events.

Filming

Film-related events, such as film premieres and awards ceremonies, frequently require partial or full closure of Hollywood Boulevard in the Project Area, including sidewalks and crosswalks, for periods of several hours to several days at a time. One block of Hollywood Boulevard, between Highland Avenue and Orange Drive, sees frequent closures for special events, for up to 14 days for the Academy Awards ceremony and typically three days for film premiers.

Hollywood Bowl

The Hollywood Bowl (the Bowl) is a large outdoor music venue located at 2301 North Highland Avenue in the Project Area. With a seating capacity of 17,500 people, the Bowl draws large crowds to evening concerts and other events on the weekends and two or more additional nights per week during the season, June through September. The Bowl also hosts concerts by various sponsors (i.e. "for lease events") throughout the year. Located in a hilly, residential area, the Bowl is accessible from the Highland Avenue/Hollywood Bowl and Cahuenga Boulevard/Vine Street exits of US-101. Event parking at the Bowl

[10]Los Angeles Times, *A Citizens Sidewalk Brigade for L.A*, September 11, 2012.

is provided in four lots on either side of Cahuenga Boulevard/Highland Avenue and Odin Street. All parking is stacked with no early exit.

Visitors are encouraged to take advantage of a number of transportation options for events. These include 13 Park & Ride locations throughout Los Angeles County, offering roundtrip bus service to and from the Bowl. The Bowl Shuttle also offers roundtrip service from five locations, including two Metro stations: Hollywood/Highland on the Metro Red Line and Union Station, where Metro Gold, Red, and Purple Lines along with many local and regional bus lines converge.

John Anson Ford Theatre

The John Anson Ford Theatre is a music venue located at 2580 Cahuenga Boulevard East. The outdoor amphitheater can host 1,200 people and has a range of events, such as dance, film, and music, throughout the year. Visitors have a variety of options to get to the theater. A free Ford shuttle picks up at the Universal City/Studio City Metro Shop. Visitors can pay to park off-site (non-stacked and a free shuttle to the theater) or on-site (stacked). LA Metro bus lines 156 and 222 also provide service to the theater.

Hollywood Palladium

The Hollywood Palladium is a music venue located at 6215 Sunset Boulevard. The Palladium can host up to 4,000 people. Visitors can take the Metro Red Line to the Hollywood/Vine station. The venue also provides paid, on-site parking, with several other paid lots and on-street metered parking in the vicinity.

The Fonda Theatre

The Fonda Theatre is a concert venue located at 6126 Hollywood Boulevard. The Fonda can host 1,200 people and primarily has concerts but also hosts live events, private parties, and film/TV shoots. Visitors can take the Metro Red Line to the Hollywood/Vine station or several bus lines (180, 181, and 217). The Fonda also has onsite parking that must be reserved in advance.

Hollywood Pantages Theatre

The Hollywood Pantages Theatre is located at 6233 Hollywood Boulevard. The theater can host 2,700 people and primarily has live stage and Broadway productions. The Pantages also occasionally hosts concerts, filming, and special live events. Visitors can take the Metro Red Line to the Hollywood/Vine station and several bus lines (Metro 180, 181, 217, 222, 780 and DASH Hollywood and Hollywood/Wilshire). The theater does not provide onsite parking but provides visitors the option to reserve parking spots at nearby independently managed parking lots.

THRESHOLDS OF SIGNIFICANCE

This section explains the metrics used to measure the performance of the Proposed Plan. The metrics used are from the updated CEQA Guidelines from the California State Office of Planning and Research (OPR) in effect since late December 2018.

HISTORY

Senate Bill 743 directed OPR to "prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing criteria for determining the significance of transportation impacts of projects within transit priority areas… Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by LOS or similar measures of

vehicular capacity or traffic congestion within a transit priority area, shall not support a finding of significance pursuant to this division…"[11]

On January 20, 2016, OPR updated the CEQA Guidelines "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA," the evaluation of vehicle miles traveled (VMT) was recognized as "generally the most appropriate measure of transportation impacts."

On November 2017, OPR proposed a new section, 15064.3, to help determine the significance of transportation impacts. This section was updated July 2, 2018 and finalized on December 28, 2018 with criteria for analyzing transportation impacts, and is seen below in the section *Thresholds of Significance Applied to Proposed Plan*. Its purpose is to describe specific elements for considering the transportation impacts of a given project given the use of VMT as the primary measurement.

Per the guidance from OPR, "a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide."[12]

PERFORMANCE METRICS

The current metrics shift the focus from level of service (LOS) to vehicle trips (VT) and vehicle miles traveled (VMT). These are defined as follows, with methodology specifics outlined in the following *Methodology* section:

Vehicle Trips (VT). VT are defined as the number of trips undertaken in an automobile, such as in single occupancy vehicles, private automobiles, and vehicles that contain two or more travelers, such as carpools, taxis, or ride-share vehicles. A reduction in VT over time can be used as an indicator of reduced reliance on the automobile as well as an indicator of more travel by carpools.

Vehicle Miles Traveled (VMT). VMT is a measurement of miles traveled (e.g., private automobiles, trucks and buses) generated by all land uses (e.g., residential, retail, office) in the Project Area. To compare scenarios, VMT per service population is used. A reduction in VMT overall and in VMT per service population can be used as an indicator of reduced reliance on vehicular travel, primarily by private automobiles.

Service Population. Service Population is the sum of population and employment. It is used in this study to represent both residents and employees. Some VMT metrics focus on VMT per capita and VMT per employee as separate markers of these indications; however, VMT per service population showcases the effects of all vehicular movement in an area. It includes not only trips that are attracted and produced by home and work trips, but those that fit in neither category (i.e. school to grocery store) as well as truck trips. It is therefore more representative of the effect of users and trips on the roadways in this CPA.

THRESHOLDS OF SIGNIFICANCE APPLIED TO PROPOSED PLAN

In accordance with Appendix G of the aforementioned CEQA Guidelines, the Proposed Plan would have a significant impact related to transportation if it would:

1. **Conflict with a program, plan, ordinance or policy** addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.

[11] SB 743, 2013-2014 CA State Cong. § 386 (2013)

[12] California Natural Resources Agency. *Notice of Public Availability of Modifications to Text of Proposed Regulation and Addendum to the Initial Statement of Reasons and Informative Digest: OAL Notice File No. Z-2018-0116-12*. California, 2018

2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).

a. Text of CEQA Guidelines Section 15064.3, Subdivision (b):

i. ***Land Use Projects.*** *Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half 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 vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.*

ii. ***Transportation Projects.*** *Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.*

iii. ***Qualitative Analysis.*** *If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.*

iv. ***Methodology.*** *A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.*

b. The Proposed Plan would have an impact related to transportation if it would result in VMT per service population that exceeded an applicable threshold of significance. OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development regionally may be a reasonable threshold. However, the "region" identified for the City of Los Angeles is the six-county SCAG region, which is very large and not representative of the Plan area. Holding this Plan Area to that as a threshold would likely promote an increase in VMT. Additionally, the use of per capita and per employee is **not** as representative of all travel in the area as per service population. As "CEQA generally defers to lead agencies on the choice of methodology to analyze impacts"[13], the City of Los Angeles is choosing to use the following as part of a two-pronged threshold:

i. The Plan would result in average total VMT per service population in the plan horizon year that exceeds 15% below the regional average total VMT per service *population* from the most recent regional metric available.

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

ii. The Plan would result in average total VMT per service population in the plan horizon year that exceeds the average total VMT per service population for the baseline year.

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

4. **Result in inadequate emergency access.**

METHODOLOGY

The transportation analysis for the Proposed Plan has been developed through a process that includes the use of a Hollywood Subarea TDF Model for the analysis of Existing 2016 Conditions compared to Future 2040 With Project Conditions. For some impact areas, a comparison of Future Without Project to Future With Project is also provided for informational purposes only. This section describes the procedures used to assess impacts on the transportation system. It includes an overall discussion of methodology and assumptions, followed by a discussion of how the Proposed Plan is expected to perform for each of the thresholds described above.

STUDY AREA AND REPORTING FRAMEWORK

The Project Area is defined by the boundaries of the Hollywood CPA in the City of Los Angeles. The study area is defined by the potential impacts of the Proposed Plan to transportation and safety. The EIR studied impacts to areas within the Proposed Plan boundaries, adjacent areas in the City of Los Angeles, neighboring jurisdictions and freeways that serve the region. The extent of the study area was determined by comparing traffic volumes under Future With Project and Future Without Project Conditions using the Hollywood Subarea Model. The study area extends out from the Plan boundaries until the change in traffic volume related to the Future With Project Conditions was less than two percent, which is generally less than two miles from the Proposed Plan boundary.

VMT METHODOLOGY

In order to determine whether the socio-economic and transportation network included in the Proposed Plan would result in an impact (as outlined in the *Thresholds of Significance* section previously), VMT calculated for 2016 Baseline and 2016 SCAG Region is compared to the 2040 Proposed Plan. This is calculated using the following outputs from the City of Los Angeles, Hollywood Subarea, and SCAG TDF Models.

VEHICLE TRIPS

Vehicle Trips are defined as the number of trips undertaken in an automobile or a truck, such as in single-occupancy private automobiles, vehicles that contain two or more travelers, such as carpools, taxis, or ride-share vehicles, and trucks including light truck, medium truck, and heavy truck. While the total number of vehicle trips is expected to increase as growth occurs in the Plan Area and in the region, a reduction in vehicle trips per service population over time can be used as an indicator of reduced reliance on the automobile as well as an indicator of more travel by carpools. A reduction in the number of vehicle trips per service population also helps meet the State's goal of reducing GHG emissions, as mandated by AB 32 and SB 375. Any increase in the number of daily vehicle trips per service population would be an undesirable outcome of the Proposed Plan but would not constitute an impact.

Vehicle trips are calculated from outputs of the Hollywood TDF model and SCAG TDF model. With estimated population relevant to each model's year, household and employment values input into each model Traffic Analysis Zone (TAZ), the models develop a vehicle trip calculation for the Plan Area and SCAG Region. A Traffic Analysis Zone is a spatial unit that includes socioeconomic data.

VEHICLE MILES TRAVELED (VMT)

VMT is a measurement of miles traveled (e.g., private automobiles, trucks and buses) generated by all land uses (e.g., residential, retail, office). While the total VMT is expected to increase as growth occurs in the Plan Area and in the region, a reduction in VMT per service population over time can be used as an indicator of reduced reliance on the automobile. Reducing VMT helps meet the State's goals of reducing GHG emissions, as mandated by AB 32 and SB 375. Any increase in the total number of VMT per service population would be an undesirable outcome of the Proposed Plan and would constitute an impact. VMT was forecasted for the Plan Area with the Hollywood model.

For this analysis, VMT is reported as Total Daily VMT per Service Population. The Total Daily VMT per Service Population is the total VMT divided by the number of people living or working within the Community Plan Area. This VMT is generated by residents, employees, and visitors in Hollywood and captures their travel within Hollywood as well as travel between Hollywood and their ultimate origin/destination.

The reported VMT results include both personal vehicles and truck VMT. The VMT calculation accounts for internal (II) trip ends and trips that begin or end (IX or XI) within the Plan Area, as these trips are generated by or attracted to land uses within the Plan Area. The travel behavior effects of land use changes in Hollywood can be understood by measuring the VMT of trips originating in and/or destined for the Plan Area and comparing them to the 2016 Baseline and 2016 SCAG Region outputs.

VMT is calculated by multiplying the vehicle trips by the number of trips estimated through the Hollywood model. Due to all of the inputs in the Hollywood and SCAG TDF models, VMT is taking into consideration population, housing, and employment values, as well as travel patterns of origins and destinations.

ROADWAY SEGMENT AND FREEWAY MAINLINE LOS METHODOLOGY

In addition to the VMT methodology, the Proposed Plan was also analyzed using LOS changes on road segments, as described below. As discussed above, under SB 743, LOS as a metric for traffic congestion is not used to determine significant impacts for CEQA. However, congestion may still be considered for safety and therefore, this information is used to inform the analysis related to emergency access, as well as for informational and historical comparison purposes.

LOS is a qualitative measure used to describe the condition of traffic flow and LOS definitions for street segments are summarized in **Table 4.15-6**. LOS can be determined by dividing demand V/C, and the resulting V/C ratio is then used to obtain the corresponding LOS. The capacity values for analyzed roadway segments were obtained from the Hollywood Model.

Plans that involve large areas and are not expected to be fully implemented until Year 2040 or beyond are not analyzed effectively by detailed intersection V/C analyses. In addition, detailed roadway designs for improvements to individual intersections are not yet available. Consequently, roadway segment analysis is commonly used to determine the average service capacity of the roadway network. Street segment capacity impacts are generally evaluated in program-level analyses (such as community plans or long-range development projects) for which details regarding specific land use types, sizes, project access points, etc., are not known.

TABLE 4.15-6: ROADWAY SEGMENT LEVEL OF SERVICE (LOS) DEFINITIONS		
Level of Service (LOS)	**Volume to Capacity Ratio (V/C)**	**Description**
A	0.00 – 0.60	Excellent operation. All approaches to the intersection appear quite open, turning movements are easily made, and nearly all drivers have freedom of operation.
B	>0.60 – 0.70	Very good operation. Many drivers begin to feel somewhat restricted within platoons of vehicles. This represents stable flow. An approach to an intersection may occasionally be fully utilized and traffic queues start to form.
C	>0.70 – 0.80	Good operation. Occasionally drivers may have to wait more than 60 seconds, and back-ups may develop behind turning vehicles. Most drivers feel somewhat restricted.
D	>0.80 – 0.90	Fair operation. Cars are sometimes required to wait more than 60 seconds during short peaks. There are no long standing traffic queues. This level is typically associated with design practice for peak periods.
E	>0.90 – 1.00	Poor operation. Some long-standing vehicular queues develop on critical approaches to intersections. Delays may be up to several minutes.
F	>1.00	Forced flow. Represents jammed conditions. Backups from locations downstream or in the cross street may restrict or prevent movement of vehicles out of the intersection approach lanes; therefore, volumes carried are not predictable. Potential for stop and go type traffic flow.
SOURCE: Transportation Research Board, *Highway Capacity Manual, Special Report 209*, Washington, D.C., 2000.		

LOS can be determined by dividing the number of vehicles (i.e., volume (V)) by roadway capacity (C), and the resulting V/C ratio is then used to obtain the corresponding LOS. The volume-weighted V/C ratio is used in order to obtain aggregate statistics regarding the transportation conditions, allowing a comparison of different scenarios and alternatives. The weighted average V/C ratio represents typical travel conditions for the roadway network in the Project Area. The volume-weighted average V/C ratio is calculated by taking the volume of each street segment and multiplying it by its corresponding V/C ratio. This is divided by the sum of the total volumes, and essentially represents the average V/C ratio for the roadway network in the Project Area.

TRAVEL DEMAND MODEL DEVELOPMENT

The City of Los Angeles TDF Model provides the ability to evaluate the transportation system, use performance indicators for land use and transportation alternatives, provide information on regional pass-through traffic versus locally generated trips, and graphically display these results. The model considers forecast growth in City of Los Angeles and surrounding areas, including special generators, such as airports and universities, and is sensitive to emerging land use trends through improved sensitivity to built environment variables. The model forecasts AM and PM peak period and daily vehicle and transit flows on the transportation network in the City. In essence, the travel demand model serves as a tool to implement, manage and monitor the City of Los Angeles' transportation plans, projects, and programs, providing a suitable starting point for additional refinement as part of a more local application, such as the Proposed Plan.

The potential impacts associated with implementation of the Proposed Plan are evaluated using a refined version of the City of Los Angeles' Travel Demand Model within the Hollywood area. The Hollywood Subregion Travel Demand Forecasting Model (referred to as the Hollywood Model) utilizes the TransCAD Version 5.0 R4 Build 2025 modeling software (consistent with the citywide model) and has been calibrated

and validated for 2016 conditions. The Hollywood Model builds on the citywide model update and refines the level of detail within the Plan Area for improved sensitivity in measuring the effect of land use development and transportation network changes. The model has a future horizon year of 2040 and was designed to produce daily and AM and PM peak hour vehicle and transit flows on roadways within the Project Area based on comprehensive land use and socioeconomic data (SED) and uses a conventional 4-step process of trip generation, trip distribution, modal split and assignment. For modeling purposes, the City of Los Angeles is divided into 2,250 Transportation Analysis Zones (TAZs), each with corresponding SED and connections to the roadway and transit networks. The 46 TAZs that encompass the Hollywood Community Plan in the citywide model were subdivided into 97 TAZs for purposes of this analysis. The subdivided TAZs better reflect how and where traffic enters and exits the street network and is divided along logical transportation boundaries like major streets and topography.

The Hollywood Model is consistent with the most recent 2016-2040 RTP/SCS model's regional transportation network and regional growth forecasts and contains City of Los Angeles SED for both the existing and future conditions within the boundaries of the Hollywood Community Plan. The Hollywood Model was used to generate the Existing Conditions, Future Without Project Conditions, and Future With Project Conditions data for the transportation impact analysis. The Hollywood Community Plan Area Model Development Report is contained in Appendix J.

IMPACT ANALYSIS

The purpose of the transportation analysis is to identify potential transportation system deficiencies resulting from vehicle trips generated by the employment and population growth anticipated under the Proposed Plan and the proposed transportation network improvements, and to identify feasible mitigation measures. The Proposed Plan is a long-term plan that will be implemented over many years in conjunction with already approved development projects in the study area, and regional growth and transportation projects outlined in the 2016-2040 RTP/SCS. The Proposed Plan is represented by the 2040 Proposed Plan scenario, and is compared to 2016 Baseline and 2016 SCAG Region scenarios in order to show the potential impacts of the plan.

The Hollywood Subarea Model is built upon and includes the entirety of the City of Los Angeles Travel Demand Forecasting Model, which is consistent with the 2016-2040 SCAG RTP/SCS model and includes all reasonably foreseeable development and regional transportation improvements for the year 2040 in the City of Los Angeles as well as the adjacent Cities, such as West Hollywood, Burbank and Glendale. Thus, the Hollywood Subarea Model includes the regional growth forecast for both inside and outside of the Plan area for the purpose of the Future 2040 Without Project Conditions and for analyzing Future With Project Conditions. The Hollywood Subarea Model refines the level of detail within the Plan Area for improved sensitivity in measuring the effects of land use and transportation network changes.

The analysis tools used to forecast future travel patterns are long-range models of travel demand. Long-range travel demand models primarily focus on forecasting auto use, with limited sensitivity to other modes of travel such as transit, bicycling, and walking. This is consistent with the traffic forecasting methods used by most cities and is consistent with the state of the transportation and traffic engineering practice. Recently, new travel behavior trends have emerged that traditional travel demand models are not designed to accommodate. Transportation and traffic experts continue to evaluate the anticipated longevity of these trends and the impact they may have on travel behavior in the future. Factors that affect long-term trends in travel behavior include recessionary effects on employment, changes in younger generations' interest in driving and vehicle ownership, baby boomer retirement choices and their continued participation in the workforce, increasing preference across generations for urban living, fuel prices, increased availability of on-demand delivery of goods and services, and greater travel options through autonomous vehicles and shared use mobility (e.g., Lyft, Uber, bikeshare programs).

The transportation analysis approach used in this EIR applies established traffic forecasting tools that have been empirically proven and previously accepted under CEQA. However, these may prove to be conservative if some of the recent trends in travel persist. It is not clear what direction the trends will take at this point. VMT service population has been generally dropping since around 2004 but increased for many decades prior. If the trends toward higher levels of walking, bicycling, and transit use exceed what is forecast in the EIR, this could result in fewer driving-related impacts than the plan conservatively accounts for in the EIR. It is possible, however, that innovations in autonomous and driverless vehicles, transportation network companies (e.g., Lyft and Uber), and same-day delivery will increase future VMT service population. A variety of factors contribute to VMT, and transportation technologies along with demographic trends will influence future travel behavior. It would be speculative to make assumptions about how these new technologies and changes in transportation may affect travel behavior long-term; therefore, the methodologies and travel forecasts applied in this analysis rely on the state-of-the-practice at this time as previously accepted under CEQA.

PROPOSED PLAN MOBILITY NETWORK

MP 2035 provides the framework for future community plan updates, which take a closer look at the transportation system in specific areas of the City and recommend more detailed implementation strategies to realize MP 2035. The MP 2035 reflects policies and programs that lay the foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the City of Los Angeles, including the Hollywood Community Plan. MP 2035 was adopted by the City in August 2015 and is compliant with the 2008 Complete Streets Act (AB 1358), which mandates that the circulation element of a City's General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

As part of the Proposed Plan, a Transportation Impact Assessment (TIA) fee is proposed to fund transportation improvements through collecting fees associated with new development within the Plan Area. The types of transportation improvements envisioned as part of the Proposed Plan are within the framework established in MP 2035. However, the proposed TIA fee program would provide additional funding from new development that would enable transportation improvement projects to be implemented within the Plan Area sooner than they otherwise would be based on currently available funding sources. The Proposed Plan is consistent with the City's multimodal approach to transportation planning and applies such principles to the Plan Area in a more targeted manner. The improvements proposed would provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle) as part of the transportation system.

The City has prepared a Nexus Study (contained in Appendix K) to show the relationship between the proposed fees and new development in the Plan Area in compliance with the State of California Mitigation Act (AB 1600) (Government Code Sections 66000, et seq.). The purpose of a nexus study is to establish the relationship, referred to as the "nexus," between new development expected to occur and the need for new and expanded major public facilities. After establishing the nexus, the TIA fees to be levied for each land use in the area of benefit are calculated based on the proportionate share of the total facility use for each type of development. Fee programs require new development to mitigate their project specific impacts and to contribute a fair share to complete regional improvements to mitigate the cumulative impacts. Since the fees contributed by new development only cover a portion of the project costs, LADOT has leveraged developer fees to secure outside transportation grants to help pay for the remaining project costs, primarily by submitting grant applications in the Metro Call for Projects process.

As part of the development of the proposed TIA fees, a list of transportation improvements was developed to provide an overview of the types of projects that could be funded through the collection of TIA fees from new development projects. The transportation improvements identified primarily originated from the MP 2035, the current Hollywood Community Plan, and projects that would support the goals and policies of the Proposed Plan. The enhanced network treatments envisioned through MP 2035 were reviewed and refined to complement the anticipated growth areas as well as the Proposed Plan's goals and policies. Since MP 2035 does not prescribe or mandate how the enhanced network treatments are implemented within each community plan, the refinements to the enhanced network treatments primarily consisted of developing potential implementation options within the Project Area.[14]

The Transportation Project List is presented below in **Table 4.15-7**. The Project List represents the types of improvements proposed for consideration in the Community Plan. In addition, the Proposed Plan would not, itself, entitle or otherwise approve any transportation projects. Nevertheless, potential impacts of implementing the transportation improvements contained in the Project Lists were analyzed at a programmatic level as part of the Proposed Plan under Future With Project Conditions.

TABLE 4.15-7: PROPOSED PLAN TRANSPORTATION IMPROVEMENT PROJECT LIST

Primary Mode	Project Name	Project Description
Active Modes	Mobility Hub Amenities	Encourage projects located near transit nodes and Mobility Hubs to provide people-oriented amenities such as shade trees, countdown crosswalk signals, bus shelters, bicycle racks or lockers and enhanced or decorated crosswalks.
	Pedestrian Access to Major Transit Stations	Support the development of coordinated intermodal strategies to implement linkages to future public transit services. Provide enhanced amenities at major transit stops, including widened sidewalks, where possible, pedestrian waiting areas, transit shelters, comfortable seating, enhanced lighting, information kiosks and wayfinding signage (directing pedestrians to transit stops and stations, and from transit facilities to points of interest in the surrounding neighborhood), advanced fare collection mechanisms, shade trees and landscaping, bicycle access, self-cleaning restrooms, and enhanced, ADA compliant street crossing elements adjacent to transit stops and stations (i.e., enhanced crosswalks, crossing signals, and accessible ramps).
	Path Network	Support the construction of pedestrian pathways, bicycle paths and facilities, and the reconnection of Van Ness Ave., as part of any park space built over the US-101.
		Class I Bike Path: the Los Angeles River Bike Path
	Bicycle Enhanced Network & Bike Lanes	Hollywood Blvd.: Virgil Ave. to La Brea Ave. BEN: Protected Bike Lanes
		Melrose Ave.: La Cienega Blvd. to Highland Ave. BEN: Protected Bike Lanes
		Vine St: Franklin Ave. to Melrose Ave. Tier 1 Bike Lanes
		Wilton Pl.: Franklin Ave. to Melrose Ave. Shared Vehicle/Bike Lanes
		Virgil Ave: Melrose Ave. to Los Feliz Blvd. Tier 1 Bike Lanes
	Neighborhood Enhanced Network	Amenities and improvements: • Bicycle and pedestrian friendly streets • Share the Road bike icons • Bicycle friendly drainage grates • Directional/wayfinding signage • Bicycle signals and/or push buttons • Bicycle loop detectors • Vehicle speed reduction treatments
	Bikeshare	Provide public bicycle rental in "pods" located throughout the Community Plan Area.

[14]MP 2035, page 56 states the following "The Mobility Plan will provide the framework for future community plans and specific plans that will take a closer look at the Plan's Enhanced Networks and PEDs analysis, in specific areas of the City and may recommend more-detailed implementation strategies to realize the MP 2035. More detailed land use planning may reveal the need for changes to the networks, which will be undertaken as needed to reflect these more detailed planning efforts."

TABLE 4.15-7: PROPOSED PLAN TRANSPORTATION IMPROVEMENT PROJECT LIST

Primary Mode	Project Name	Project Description
Roadways & ITS	Congestion Monitoring	Implement or enhance "Smart Corridors" to coordinate Caltrans' freeway traffic management system with the Automated Traffic Surveillance and Control (ATSAC)/Adaptive Traffic Control System (ATCS) highway and street traffic signal management system to enhance incident management and motorist information to reduce traffic delays.
	ITS Corridor & Signal Upgrades	Implement ITS and signalization improvements to facilitate traffic flow.
	Intersection Improvements	Identify intersections where congestion related to left turns can be improved, such as intersections along Hollywood Blvd. in East Hollywood, and implement improvements, taking into consideration impacts on pedestrians and bicyclists. Support evaluation and improvement of the complex five-way intersection at Sunset Blvd., Hollywood Blvd., Hillhurst Ave. and Virgil Ave. Study the addition of a second southbound right-turn lane on Highland Ave. at the intersection of Highland Ave. and Franklin Ave., while maintaining sidewalks with a minimum width of 15 feet. Implement a double left-turn lane, eastbound and westbound, on Sunset Blvd. at Western Ave.
	Access Improvements	Support the construction of a new multi-lane roadway to extend from the intersection of Barham Blvd./Forest Lawn Dr. through the NBC/Universal site to Coral Drive adjacent to the US-101. Restripe Cahuenga East south to the US-101 on-ramp near Pilgrim Bridge to provide two lanes on Cahuenga East between the US-101 on-ramp and the US-101 Barham Blvd. off-ramp and from there, three lanes northbound. Restripe Barham Blvd. to allow three southbound lanes and two eastbound lanes within the existing roadway.
	Vehicle Enhanced Network	Highland Ave & Sunset Blvd: Between US-101 Interchanges VEN Corridor/ITS Improvements
	Neighborhood Protection Program	Implement Neighborhood Traffic Management Plans, including possible speed humps, medians, directional signs, and other streetscape improvements along canyon routes and associated streets across the Hollywood Hills, as well as neighborhoods generally located between the following streets: • Franklin Ave. and Hollywood Blvd. • Sunset and Hollywood Blvd. • Sunset and Santa Monica Blvd. • Santa Monica Blvd. and Melrose Ave, including blocks south of Melrose Ave. Franklin Ave and Mulholland Dr. • Highland Ave., La Brea Ave., and Martel Ave. along the Willoughby Corridor
Transit	Transit Enhanced Network	Los Feliz Blvd.: Vermont Ave. to Riverside Dr. TEN: Comprehensive Treatments with Dedicated Bus Lane
		Hollywood Blvd.: Virgil Ave. to La Brea Ave. TEN: Moderate Treatments with Shared Vehicle/Bus Lane
		Santa Monica Blvd.: Madison Ave. to La Brea Ave. TEN: Comprehensive Treatments with Dedicated Bus Lane (cost does not include roadway widening to Modified Ave. I)
		Fairfax Ave.: Rosewood Ave. to Hollywood Blvd. TEN: Moderate Treatments with Shared Vehicle/Bus Lane
		La Brea Ave.: Rosewood Ave. to Sunset Blvd. TEN: Comprehensive Treatments with Dedicated Bus Lane
		La Brea Ave.: Sunset Blvd. to Hollywood Blvd. TEN: Comprehensive Treatments with Dedicated Bus Lane (cost does not include roadway widening to Modified Avenue I)
		Western Ave.: Melrose Ave. to Hollywood Blvd. TEN: Moderate Plus with Dedicated Bus Lane
		Vermont Ave: Melrose Ave. to Hollywood Blvd. TEN: Comprehensive Treatments with Dedicated Bus Lane
		Vermont Ave: Hollywood Blvd. to Los Feliz Blvd. TEN: Moderate Treatments with Shared Vehicle/Bus Lane

TABLE 4.15-7: PROPOSED PLAN TRANSPORTATION IMPROVEMENT PROJECT LIST		
Primary Mode	**Project Name**	**Project Description**
Auto-Trip Reduction	Strategic Parking Program	Implement a parking program and update parking requirements to reflect mixed-use developments, shared parking opportunities, and parking needs at developments adjacent to major transit stations.
	Rideshare Toolkit	Develop an online Transportation Demand Management (TDM) Toolkit with information for transit users, cyclists, and pedestrians as well as ridesharing. The Toolkit would include incentive programs for employers, schools, and residents. Additionally, it would be specific to City businesses, employees, and visitors and would integrate traveler information. It would also include carpooling/vanpooling and alternative work schedules.
	Transportation Demand Management (TDM) Program	This program would provide start-up costs for Transportation Management Organizations/Associations (TMOs/TMAs). It would also provide guidance and implementation of a TDM program.

Figure 4.15-7, Future Mobility Network, shows the following enhanced network treatments for roadways in the Hollywood Community Plan:

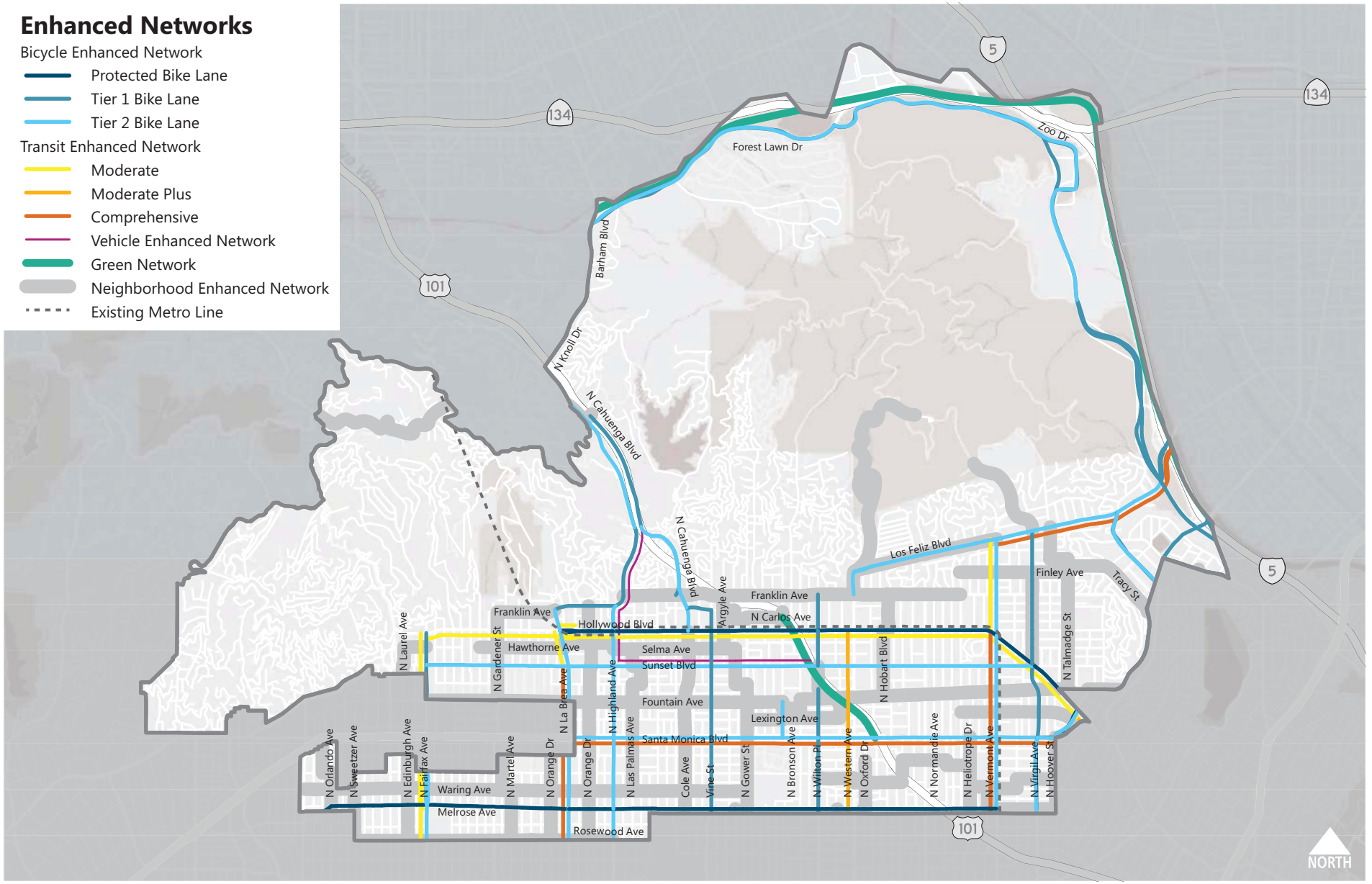
- Bicycle Enhanced Network (BEN)
- Transit Enhanced Network (TEN)
- Neighborhood Enhanced Network (NEN)
- Vehicle Enhanced Network (VEN)

The future mobility network in the Project Area reflects the following refinements to MP 2035:

- Melrose Avenue between Vermont Avenue and Hoover Street was converted from a BEN to a NEN due to the roadway width and available right-of-way along this portion of the corridor. West of Vermont Avenue and Melrose Avenue would remain as part of the BEN.
- Vermont Avenue between Los Feliz Boulevard and Hollywood Boulevard was converted from a Comprehensive TEN to a Moderate TEN due to the character of the roadway along this portion of the corridor. The Moderate TEN treatment would provide mixed-flow bus and vehicular lanes instead of a bus only lane to preserve on-street parking for the adjacent commercial uses. South of Hollywood Boulevard and Vermont Avenue would remain as part of the Comprehensive TEN.

The Proposed Plan's mobility network as described above could be implemented over time. The mobility network improvements would provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle) in the Project Area. The Proposed Plan would not, itself, entitle or otherwise approve any transportation projects. However, the proposed TIA fee program would provide additional funding from new development that would enable transportation improvement projects to be implemented within the CPA sooner than they otherwise would be based on currently available funding sources.

To consider the range of potential impacts that could occur from the enhanced network treatments contained in the Project List, two implementation options were developed for the purpose of analyzing potential impacts. Similar to the MP 2035, the Proposed Plan does not prescribe how the enhanced network treatments will be implemented within each community plan. Therefore, the enhanced network treatments in the Plan Area were reviewed in relation to the roadway characteristics, such as roadway width, right-of-way, street designations and adjacent land uses. Treatment Option 1 generally prioritizes vehicle and transit capacity, while Option 2 generally prioritizes the preservation of on-street parking. **Table 4.15-8** presents the enhanced network treatments in the Project Area along with a description of the two implementation options.



SOURCE: MOBILITY 2035, FEHR & PEERS, 2016.

FIGURE 4.15-7

FUTURE MOBILITY NETWORK

TABLE 4.15-8: HOLLYWOOD COMMUNITY PLAN MOBILITY TREATMENT OPTIONS

Roadway Segment	Enhanced Network Designation	Current Cross-Section	Hollywood Community Plan Update	
			Treatment Option 1 ***Prioritize Vehicle/Transit Capacity***	**Treatment Option 2** ***Prioritize On-Street Parking***
Los Feliz Blvd.: Vermont Ave. to Riverside Dr.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods).	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Hollywood Blvd.: Virgil Ave. to La Brea Ave.	BEN: Protected Bike Lanes TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Protected Bike Lanes; Moderate TEN Treatments; Peak period parking restrictions with two vehicle lanes in each direction (on-street parking and one vehicle lane per direction in off-peak travel periods)	Protected Bike Lanes; Moderate TEN Treatments; All-day parking with one vehicle lane in each direction
Highland Ave. & Sunset Blvd.: Between US-101 Interchanges	VEN	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	Three vehicle lanes in each direction with parking removal	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)
Santa Monica Blvd.: Madison Ave. to La Brea Ave.	TEN: Comprehensive Treatments with Dedicated Bus Lane (assumes roadway is widened to Modified Avenue I)	Two vehicle lanes in each direction with on-street parking	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Melrose Ave.: La Cienega Blvd. to Highland Ave.	BEN: Protected Bike Lanes	Two vehicle lanes in each direction with on-street parking	Protected Bike Lanes; Peak period parking restrictions with two vehicle lanes in each direction (on-street parking and one vehicle lane per direction in off-peak travel periods)	Protected Bike Lanes; All-day parking with one vehicle lane in each direction
Fairfax Ave: Rosewood Ave. to Hollywood Blvd.	TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Moderate TEN Treatments; Two vehicle lanes in each direction with on-street parking	*Same as Scenario 1*
La Brea Ave: Rosewood Ave. to Sunset Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction

TABLE 4.15-8: HOLLYWOOD COMMUNITY PLAN MOBILITY TREATMENT OPTIONS

Roadway Segment	Enhanced Network Designation	Current Cross-Section	Hollywood Community Plan Update	
			Treatment Option 1 ***Prioritize Vehicle/Transit Capacity***	**Treatment Option 2** ***Prioritize On-Street Parking***
La Brea Ave.: Sunset Blvd. to Hollywood Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane (assumes roadway is widened to Modified Avenue I)	Two vehicle lanes in each direction (limited on-street parking on west side).	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Vine St.: Franklin Ave. to Melrose Ave.	Tier 1 Bike Lanes	Two vehicle lanes in each direction with on-street parking.	On-Street Bike Lanes; One vehicle lane in each direction with on-street parking	*Same as Scenario 1*
Wilton Pl.: Franklin Ave. to Melrose Ave.	Tier 1 Bike Lanes	Two vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and one vehicle lane per direction in off-peak travel periods)	Shared Vehicle/Bike Lane in each direction; All-Day on-street parking	*Same as Scenario 1*
Western Ave.: Melrose Ave. to Hollywood Blvd.	TEN: Moderate Plus with Dedicated Bus Lane	Two vehicle lanes in each direction with limited on-street parking	Peak Hour Bus Only Lanes and One vehicle lane in each direction (Shared vehicle/bus lanes during off-peak travel periods)	Shared vehicle/bus lanes all-day; Maintain existing on-street parking
Vermont Ave.: Melrose Ave. to Hollywood Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Vermont Ave.: Hollywood Blvd. to Los Feliz Blvd.	TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Moderate TEN Treatments; Two vehicle lanes in each direction with on-street parking	*Same as Scenario 1*
Virgil Ave.: Melrose Ave. to Los Feliz Blvd.	Tier 1 Bike Lanes	One northbound lane and two southbound lanes with on-street parking	On-Street Bike Lanes; One vehicle lane in each direction with on-street parking *(This configuration has already been implemented between Melrose Ave and Santa Monica Blvd)*	*Same as Scenario 1*

PARKING

Parking deficits are considered to be socioeconomic effects, rather than impacts on the physical environment as defined by CEQA, but there may be secondary physical environmental impacts, such as increased air quality impacts, safety impacts, noise impacts caused by congestion, or land use impacts. According to SB 743, parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area is not considered a significant impact. A transit priority area is defined as an area within half mile of an existing or planned major transit stop; the majority of the Project Area is within a transit priority area. The Proposed Plan would have a significant impact if secondary effects related to parking contribute to other impact topics.

IMPACTS AND MITIGATION MEASURES

The impacts and mitigation discussion presented below reflects updated CEQA requirements as finalized on December 28, 2018 to implement SB 743.

IMPACT 4.15-1 Would implementation of the Proposed Plan conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities? **Less than significant impact.**

The Proposed Plan seeks to enhance access to transit stations and creates new land use to encourage appropriate mixes and scales of uses as well as site design supportive of transit use. These objectives are consistent with regional plans, such as the 2016-2040 RTP/SCS, as well as numerous local plans. The types of transportation improvements envisioned as part of the Hollywood Community Plan are within the framework established in the MP 2035. The proposed updates to the Plan are consistent with the City's multimodal approach to transportation planning and apply such principles to the Hollywood Community Plan. The proposed mobility improvements would provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle) as part of the transportation system.

In addition to MP 2035, the Proposed Plan would support the City's Plan for a Healthy LA by creating more opportunities for people to live and work in areas of the City where travel by active transportation can be part of daily life. The implementation of active transportation facilities is anticipated to improve safety and is in alignment with the City's Vision Zero Action Plan. The existing subway stations create opportunities for the City to further enhance first- and last-mile opportunities through the creation of mobility hubs. In addition, individual development projects will need to adhere to the requirements in LADOT's recently adopted Transportation Assessment Guidelines. The Proposed Plan would not conflict with adopted City and state policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, ***a less than significant impact without mitigation*** related to consistency with other plans with respect to transit, bicycle or pedestrian policies would occur.

Mitigation Measures

No mitigation measures are necessary.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.15-2 Would implementation of the Proposed Plan conflict with CEQA Guidelines section 15064.3, subdivision (b) related to VMT thresholds? **Less than significant impact.**

The Proposed Plan would have an impact if the Plan's VMT exceeds either of the following:

1. The Plan results in average VMT per service population for the 2040 Proposed Plan that exceeds 15% below the regional average total VMT per service population from 2016 SCAG Region.

2. The Plan results in average total VMT per service population for the 2040 Proposed Plan that exceeds the average total VMT per service population for the Proposed Plan Area from 2016 Baseline.

The Proposed Plan would improve the link between the locations of land use and transportation in a manner that is consistent with the MP 2035 and the General Plan Framework Element. Implementation of the Proposed Plan would create new housing and employment opportunities, mostly in areas around existing transit systems, where additional mixed-use development is expected. This is in accordance with the Framework Element's guiding policy to focus growth in higher-intensity commercial centers close to transportation and services. Under the Proposed Plan, selected commercial areas near the Metro subways and along bus lines would serve as focal points and activity centers for surrounding neighborhoods by supporting new development that accommodates a variety of uses and encourages pedestrian and multi-modal transportation activity in these commercial centers. The land use changes would also serve to create consistency with future proposed land uses and foster quality development in transition areas. In some cases, the Proposed Plan would allow for increased FARs, density, and height limits. These changes would facilitate mixed-use development in targeted areas, enable opportunities for increased housing, including affordable housing, and employment, and provide for more compatible uses and development. Where and how the Proposed Plan directs anticipated growth in relation to transportation infrastructure will affect transportation use; therefore, land use patterns are factored into the analysis of the circulation system. The Proposed Plan is consistent with several regionally-adopted land use plans, policies, and regulations that also include transportation strategies. Refer to Section 4.10, Land Use and Planning, of this Draft EIR, for a consistency analysis of the Proposed Plan with respect to SCAG's regional plans, including the RTP/SCS.

To consider the range of potential impacts that could occur from implementation of the Proposed Plan with future implementation of the enhanced network treatments, two implementation options were developed for the implementation of the enhanced network treatments. Treatment Option 1 generally prioritizes vehicle and transit capacity, while Treatment Option 2 generally prioritizes the preservation of on-street parking. **Table 4.15-9** shows vehicle trips and VMT for the 2016 SCAG Region conditions and 2040 Proposed Plan conditions, and **Table 4.15-10** shows vehicle trips and VMT for the 2016 Baseline conditions and 2040 Proposed Plan conditions.

TABLE 4.15-9: FUTURE TOTAL VEHICLE MILES TRAVELED (VMT) COMPARED TO 2016 SCAG REGION

Metric	2016 SCAG Region Conditions	Future 2040 with Project Treatment Option 1	Percent Difference	Future 2040 with Project Treatment Option 2	Percent Difference
Total Daily VT	82,283,000	785,000	N/A*	785,000	N/A*
Total Daily VT per Service Population	3.1	2.0	-35%	2.0	-35%
Total Daily VMT	948,656,000	5,902,000	N/A*	5,901,000	N/A*
Total Daily VMT per Service Population	**35.4**	**15.2**	**-57%**	**15.2**	**-57%**

SOURCE: Fehr & Peers, 2019.
** Notes: Comparison here is not applicable as the conditions represented come from different geographic areas, the SCAG region and the Plan Area respectively.*

TABLE 4.15-10: FUTURE TOTAL VEHICLE MILES TRAVELED (VMT) COMPARED TO 2016 BASELINE

Metric	2016 Baseline Conditions	Future 2040 with Project Treatment Option 1	Percent Difference	Future 2040 with Project Treatment Option 2	Percent Difference
Total Daily VT	706,000	785,000	+11%	785,000	+11%
Total Daily VT per Service Population	2.3	2.0	-12%	2.0	-12%
Total Daily VMT	5,624,000	5,902,000	+5%	5,901,000	+5%
Total Daily VMT per Service Population	**18.3**	**15.2**	**-17%**	**15.2**	**-17%**

SOURCE: Fehr & Peers, 2019.

In comparison to the SCAG region (**Table 4.15-9**), the total daily VMT per service population generated by Plan Area is 57% lower under both Treatment Option 1 and Treatment Option 2. In comparison to 2016 Baseline conditions (Table 4.15-10), the total daily VMT generated by the Plan Area is 5% higher with the anticipated growth. However, the total VMT per service population generated by the Plan Area is 17% lower than the 2016 Baseline. Given that VMT per service population for the 2040 Proposed Plan exceeds 15% below the 2016 SCAG regional average total VMT per service population and the 2040 Proposed Plan's average total VMT per service population is less than the average total VMT per service population for the Plan Area's 2016 Baseline, the impact of the Proposed Plan related to VMT thresholds would be ***less than significant***.

SECONDARY IMPACTS TO TRANSPORTATION

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA Guidelines, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents must address the secondary physical impacts that would be triggered by a social impact (CEQA Guidelines Section 15131). The social inconvenience of parking deficits, such as having to hunt for parking spaces, is not an environmental impact, but parking deficits may result in secondary physical environmental impacts, such as air quality, safety, or noise impacts caused by congestion from drivers seeking parking.

Some of the enhanced network treatments analyzed as part of the Proposed Plan have the potential to remove on-street parking in certain locations. To consider the range of potential impacts that could occur from the implementation of the enhanced network treatments, two implementation options were developed for the purpose of analyzing potential impacts. Treatment Option 1 generally prioritizes vehicle and transit capacity, while Option 2 generally prioritizes the preservation of on-street parking (see **Table 4.15-7**). For example, protected bike lanes are proposed on Hollywood Boulevard (Virgil Avenue to La Brea Avenue) as part of the enhanced network treatments. Under Treatment Option 1, peak period parking restrictions would be implemented on Hollywood Boulevard to accommodate the protected bike lanes and maintain two vehicle lanes in each direction during peak travel hours (on-street parking and one vehicle lane per direction would occur in off-peak travel periods). Under Treatment Option 2, all day parking would be provided along Hollywood Boulevard and the vehicle capacity would be reduced from two to one travel lane in each direction to accommodate the protected bike lanes. Through additional studies, it may be found that on-street parking should be maintained in exchange for a reduction in vehicle capacity (i.e., vehicle travel lane conversions to bike or bus-only lanes) or other off-street parking solutions required in certain locations along the corridors may be proposed. Individual projects would be studied in further detail as the Proposed Plan would not, itself, entitle or otherwise approve any transportation projects.

The Proposed Plan has a variety of policies and programs related to parking. Below is a sample of the proposed policies and programs in the Proposed Plan.

Policy M.6.1: Efficient management. Improve utilization and management of existing public parking supply. Support their use and encourage shared parking, market-driven pricing, and other parking innovations to ensure parking efficiency.

> **Program 93**: Create a parking management district or districts in areas of high parking demand.
>
> **Program 50**: Encourage projects located within the Regional Center to participate in District Valet Programs to mitigate any project-generated parking impacts. Participation in a District Valet Program should be considered as a traffic mitigation measure.
>
> **Program 51**: Consider allowing nightclub and other entertainment venues in the Regional Center to submit a private parking plan certified by the Department of Transportation to utilize underused private commercial parking areas for certification by the Department of Transportation in lieu of providing required on-site parking spaces.

Policy M.6.11: Maximize the use of on-street parking spaces in commercial areas.

> **Program 94**: Work with LADOT to implement Express Park, an intelligent parking management system that provides information on the location and pricing of available parking in current time and adjusts pricing and time limit in response to changes in supply and demand.

Policy M.6.12: New lots and structures. Support construction of new parking lots and structures located in high demand areas that share spaces with multiple uses and adhere to design standards. New parking structures should be built to be adaptive to a future non-parking use.

> **Program 95**: Develop new off-street public parking resources, including parking structures and underground parking, in accordance with design standards.

In addition to the enhanced network treatments analyzed as part the Proposed Plan, the following trip reduction programs would help to reduce the need for vehicular travel and better manage the supply of parking in the project area:

Policy M.1.8: Peak hour parking restrictions. Discourage peak hour parking restrictions on streets with high volumes of bicyclists. Consider peak hour parking restrictions or no on-street parking on designated segments of Boulevards and Avenues in the Vehicle Enhanced Network that facilitate travel for rush hour freeway commuters.

Policy M.2.5: Transportation demand management. Support implementation of transportation demand management strategies to minimize vehicle trips and improve mobility.

Policy M.2.1: Sustainable mobility options. Encourage sustainable mobility options. Support transportation options for persons who do not have cars or want to use their cars less and promote the use of taxis, rental cars, shared cars, shared bicycles, van pools, shuttles, secure bicycle parking, consolidated pick-up and drop-off areas for Transportation Network Companies (TNCs), and other short trip and first/last mile connections to transit. Encourage the location of these services and bus layovers near Metro Rail Stations and major transit nodes.

The Proposed Plan could result in a loss of on-street parking spaces that could increase VMT if people drive farther to find parking or seek an alternate destination with more convenient parking. However, this increased VMT could potentially be off-set by a reduction in vehicle trips resulting from travel options other than driving that would be available as part of the Proposed Plan and by implementing the proposed parking policies and programs.

In addition, the City's establishment of Modified Parking Requirement (MPR) Districts (Ordinance No. 182242) allows for the modification of parking requirements within the MPR District to maintain the required number of parking spaces for any permitted use in the District, to allow off-site parking within 1,500 feet of the site, to reduce parking requirements for individual projects, to establish less restrictive parking requirements by use within the District, to establish more restrictive parking requirements by use within the District, to create a commercial parking credit program, or to establish maximum parking requirements within the District.

Based on all of the above, secondary impacts to VMT from Parking would be ***less than significant***.

Mitigation Measures

No mitigation measures are necessary.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.15-3 Would implementation of the Proposed Plan substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses? ***Less than significant impact.***

The Proposed Plan describes the reasonably expected future development for a portion of the City and does *not* constitute a commitment to any project-specific development, introduce new streets or otherwise change the overall land use pattern within the Project Area. Furthermore, none of the regulations included in the Proposed Plan would promote sharp curves, dangerous intersections, or incompatible uses that could present safety hazards. Rather, numerous policies and programs included in the Proposed Plan emphasize transportation safety for all people using the transportation system, support implementation of transportation treatments that are designed improve roadway safety and help implement other City initiatives (such as Vision Zero or Safe Routes to School) which aim to improve the safety of the City's transportation facilities.

None of the transportation system improvements envisioned in the Proposed Plan or Project List would introduce new safety hazards or incompatible uses at intersections or along roadway segments, as most would be designed to improve safe circulation and access to the transit stations for all users. The multi-modal improvements envisioned in the Proposed Plan are intended to help minimize conflicts between pedestrians and vehicles. Furthermore, design standards in the Proposed Plan are intended to limit the number, width, and location of new driveways along major streets and in areas of high pedestrian activity, thereby improving pedestrian safety.

The implementation of bicycle and pedestrian facilities identified in the Proposed Plan and Project List are anticipated to improve the safety of bicyclists and pedestrians. Automobile speed is a major factor in the severity of collisions with bicyclists and pedestrians, the most vulnerable roadway users. Collisions with a vehicle traveling at 20 miles per hour result in a five percent pedestrian fatality rate, and fatalities increase to 40, 80 and 100 percent when the vehicle speed increases to 30, 40 and 50 mph, respectively.[15] Bicycle lanes, when accompanied by travel lane reductions can help reduce overall vehicle speeds.[16] When modified from four travel lanes to two travel lanes with a two-way left-turn lane, research along 45 corridors

[15]U. S. Department of Transportation National Highway Traffic Safety Administration, *Literature Review on Vehicle Travel Speeds and Pedestrian Injuries. DOT HS 809 021*, 1999.

[16]Federal Highway Administration (FHWA), http://www.fhwa.dot.gov/publications/research/safety/10053/index.cfm, accessed on November 19, 2012

throughout the country has found a range of 19 to 47 percent reduction in all roadway crashes. The upgrade to fully protected bicycle lanes or cycle tracks has been shown to reduce the risk of injury by 90 percent.[17]

The bicyclist and pedestrian improvements associated with the Proposed Plan and Project List are also anticipated to increase the number and visibility of bicyclists and pedestrians on the City's transportation network. Of 68 cities across California with highest per capita pedestrian and bicycle collisions, per capita injury rates to pedestrians and bicyclists are shown to fall precipitously as the number of bicyclists increases, revealing a non-linear relationship between bicycle safety and the level of bicycling.[18] This study showed as much as an eight-fold variation of collisions (expressed as a percentage of those that bike or walk to work) in comparing low and high bicycling cities. The underlying reason for this pattern is that motorists drive slower when bicyclists and pedestrians are visible either in number or frequency and drive faster when few pedestrians and bicyclists are present, resulting in higher overall travel speeds. This effect of modified driving behavior is consistent with other research focused on 24 California cities that shows that higher bicycling rates among the population generally show a much lower risk of fatal crashes for all road users.[19] Comparing these low versus high bicycling communities, there was a ten-fold reduction in fatality rate for motorists, and eleven-fold reduction in fatality rate for pedestrians, and an almost fifty-fold reduction in fatality rate for bicyclists.[20]

Inclusion of protected bicycle lanes further increases the level of safety. New York City implemented the first fully protected bike lanes in the country. Protected bike lanes in New York City on 8th Avenue and 9th Avenue resulted in a 35 percent and 58 percent decrease, respectively, in injuries to all road users.[21] In the same study, implementation of bus/bike lanes on First and Second Avenues led to a 37 percent decrease in injury crashes.[22]

The Proposed Plan is responding to changing demographics, a younger population desirous of safe and accessible active transportation options (bike, walk), a growing number of residents and employees seeking alternatives to the car, and an aging population that may need to rely more and more on transportation alternatives to the automobile. In 2030, senior citizens will make up 1/5 of Los Angeles County's population. This older population (as well as children and the disabled) will benefit from longer pedestrian crossing times, shorter street crossing distances, wider, shaded sidewalks, street benches, increased transit service and separated bicycle facilities. Ultimately, there is nothing in the Proposed Plan expected to significantly reduce pedestrian mobility, including but not limited to the disabled, those with strollers, and bus riders.

Therefore, impacts related to transportation safety as a result of design features or incompatible uses would be ***less than significant without mitigation.***

Mitigation Measures

No mitigation measures are necessary.

Significance of Impacts after Mitigation

Less than significant.

---

[17]Kay Teschke et al., *Route Infrastructure and the Risk of Injuries to Bicyclists: A Case-Crossover Study. American Journal of Public Health*, 2012.

[18]Jacobsen, P.L., *Safety in Numbers: More Walkers and Bicyclists, Safety Walking and Bicycling. Injury Prevention 9~3!:205–209*, 2003.

[19]Marshall, Wesley E., N. W. Garrick, *Evidence on Why Bike-Friendly Cities Are Safer For All Road Users. Environmental Practice 13 (1)*, March 2011.

[20]*Ibid.*

[21]NY DOT, *Measuring the Street: New Metrics for 21st Century Streets*, 2012.

[22]*Ibid.*

IMPACT 4.15-4 Would implementation of the Proposed Plan result in inadequate emergency access? ***Less than significant impact.***

As previously discussed, State law (SB 743) replaced the metric used for evaluating transportation-related impacts from automobile delay (LOS) to VMT. The impact of traffic congestion on access for emergency response and safety was maintained and is discussed below. The impact analysis below is updated in the Recirculated Draft EIR to respond to the Secretary of Natural Resources Agency's adoption guidelines to implement SB 743 and to respond to comments made on the Draft EIR related to the associated emergency access impacts from the Proposed Plan's impacts to roadway congestion, including emergency access to wildfires in the hillsides and evacuation from hillsides during wildfires. The fuller discussion below is in the interest of providing additional information to decision makers and the public.

Within the City of Los Angeles, fire prevention and suppression and emergency medical services are provided by the LAFD. Public protection service and law enforcement are provided by LAPD. This impact analysis provides an evaluation of impacts to emergency services as they relate to transportation. (EIR Section 4.14 considers the impacts to emergency services and whether that will result in impacts to the environment from the construction of new fire or emergency service or police facilities.) For individual development projects, this impact criteria considers whether a project will have adequate access to emergency services based on the road configuration and project design. At the Proposed Plan level, individual project design level details, such as location of driveway location and design, are unknown. Therefore, the Draft EIR will not consider impacts to emergency access to particular properties in the Community Plan Area or particular streets based on roadway configurations. The Recirculated Draft EIR will consider, at the detail available, the reasonably foreseeable impacts to roadway congestion from the Proposed Plan and the associated impacts to emergency access from any forecasted congestion.

Therefore, the discussion will first consider the Proposed Plan's impacts to roadway congestion using levels of services (LOS) and volume-to-capacity (V/C) criteria when compared to existing conditions (2016) and then discuss the emergency access impacts associated with roadway congestion.

Roadway Congestion

Many factors influence the LOS and V/C analysis including, but not limited to, land use patterns, the relationship between land use and transportation, how transportation treatments are designed within the existing roadways, how and where the Proposed Plan directs anticipated growth within the Plan Area, and growth anticipated in the region surrounding the Plan Area.

Land Use Patterns. Where and how the Proposed Plan directs anticipated growth in relation to transportation will affect transportation use; therefore, land use patterns are factored into the analysis of the circulation system. The Proposed Plan would create new housing and employment opportunities, mostly in areas around existing transit systems.

Regional Background Growth. On a regional level, traffic in the Project Area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without implementation of the Proposed Plan. The background growth influences the transportation analysis by accounting for the increased activity levels under Proposed Plan conditions, although those increases would occur with or without the Plan. Background growth is included in the Hollywood Subarea Model, which is built from the City of Los Angeles Model as described in the Model Development Report included in Appendix J.

Special Events. As discussed previously under Special Event Traffic Operations, special events in Hollywood frequently require partial or full closure of Hollywood Blvd. in the Project Area, including sidewalks and crosswalks, for periods of several hours to several days at a time. To the extent that event traffic occurred on a weekday (Tuesday, Wednesday or Thursday) between the months of February and May, these travel demands are accounted for when calculating the average hourly volumes within the Plan Area under Existing Conditions. This same level of special event traffic is also accounted for in the traffic forecasts and analysis of Year 2040 conditions. The Proposed Plan would not change the number or frequency of special events within the Plan Area under future Year 2040 conditions. Therefore, a separate special events analysis was not conducted for the Proposed Plan.

Level of Analysis. At the aggregate Plan scale, the traffic operation results reflect the impacts related to the Proposed Plan and the number of vehicle travel lanes. However, turn lanes, signal timings, and driveways are not accounted for in the analysis at this scale. Each of these features has the potential to affect operations, delay, VMT, and rerouting of traffic at the neighborhood level. Plans that involve large areas and are not expected to be fully implemented until Year 2040 or beyond are not analyzed effectively by detailed intersection V/C analyses. Consequently, roadway segment analysis is commonly used to determine the average service capacity of the roadway network. Street segment capacity impacts are generally evaluated in program-level analyses (such as community plans or long-range development projects) for which details regarding specific land use types, sizes, project access points, etc., are not known.[23]

Circulation System Analysis. As identified above, two criteria (weighted average V/C ratio and the number of street segments at LOS E or F) are used to evaluate the impacts of the Proposed Plan when compared to Existing conditions. To consider the range of potential impacts that could occur from implementation of the Proposed Plan with future implementation of the enhanced network treatments, two implementation options were developed for the implementation of the enhanced network treatments. Treatment Option 1 generally prioritizes vehicle and transit capacity, while Treatment Option 2 generally prioritizes the preservation of on-street parking. **Table 4.15-7** presents the enhanced network treatments in the Project Area along with a description of the two implementation options. The Proposed Plan with implementation of the enhanced networks under Treatment Option 1 and Treatment Option 2 were analyzed using the Hollywood Subarea Model. In addition, for informational purposes only, weighted average V/C ratios are provided for Future Without Project Conditions (existing plan) for comparison purposes.

Table 4.15-11 presents the volume-weighted V/C ratios and LOS results for the AM peak period. For reference, the Year 2040 without Project V/C is presented, representing anticipated growth in Year 2040 without implementation of the Proposed Plan. Under Year 2040 Without Project Conditions, the weighted V/C ratio worsens from 0.876 (LOS D) to 0.935 (LOS E). The percentage of roadway segments operating at LOS E or F increases from 37 to 42 percent. With the implementation of the Proposed Plan under both treatment options and regional growth anticipated in Year 2040, the weighted V/C ratio continues to worsen under LOS E operation, and the percentage of roadway segments operating at LOS E or F also increases.

[23]City of Los Angeles, CEQA *Thresholds Guide*, 2006, page L.2-1.

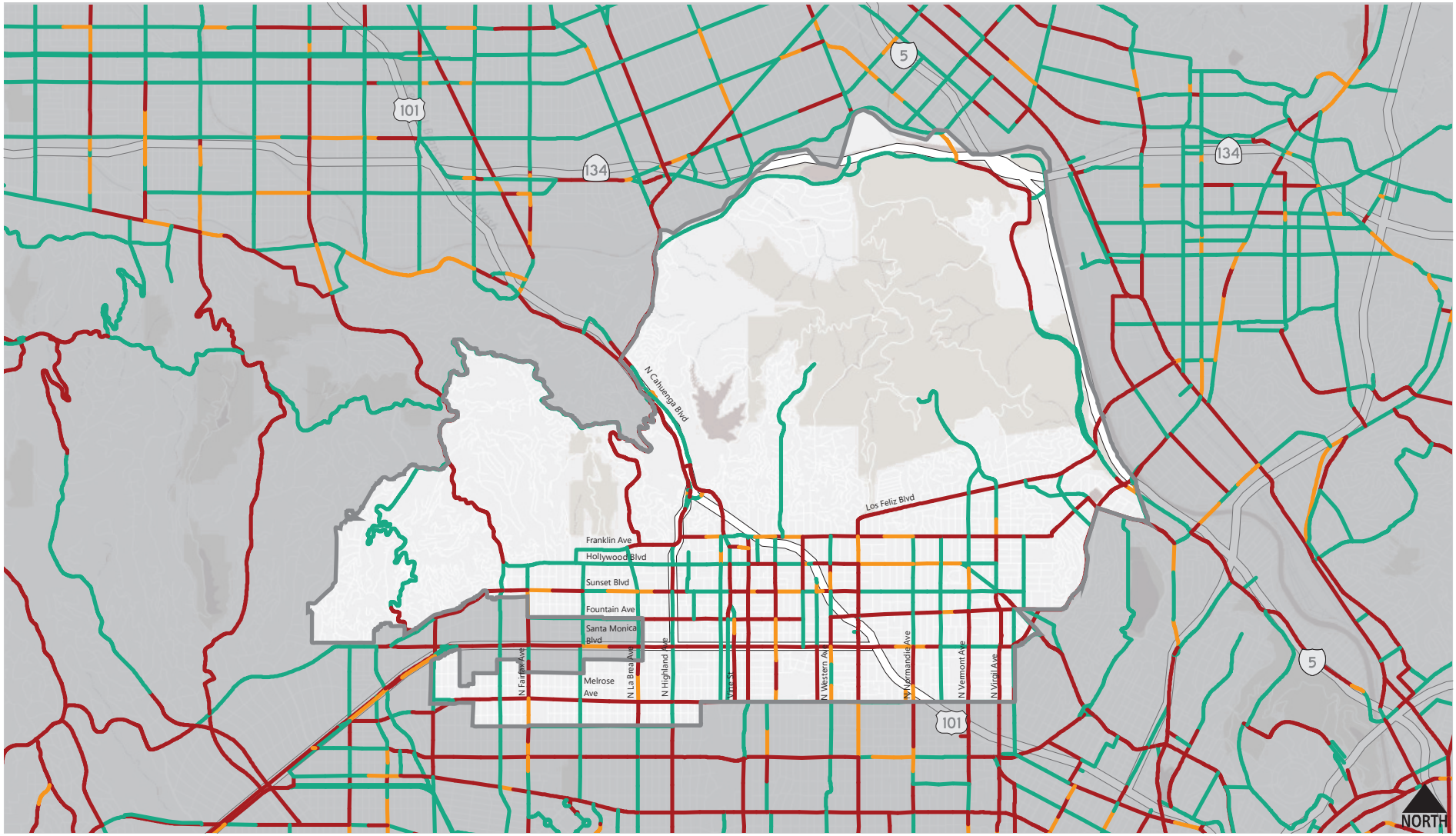
TABLE 4.15-11: AM PEAK PERIOD ROADWAY OPERATIONS				
Transportation Metrics	**Existing 2016 Conditions**	**Future 2040 Without Project**	**Future 2040 With Project Treatment Option 1**	**Future 2040 With Project Treatment Option 2**
Weighted Average V/C	0.876 (LOS D)	0.935 (LOS E)	0.959 (LOS E)	0.972 (LOS E)
Percentage (%) of Street Segments at LOS E or F	37%	42%	48%	49%
Percentage (%) of Center-Line Miles at LOS E or F	35%	40%	45%	45%
WEIGHTED AVERAGE V/C BY FACILITY TYPE				
Boulevard / Parkway	1.165 (LOS F)	1.156 (LOS F)	1.161 (LOS F)	1.161 (LOS F)
Avenue	0.862 (LOS D)	0.924 (LOS E)	0.953 (LOS E)	0.967 (LOS E)
Local / Collector	0.840 (LOS D)	0.931 (LOS E)	0.911 (LOS E)	0.920 (LOS E)
SOURCE: Fehr & Peers, 2019.				

Table 4.15-12 presents the volume-weighted V/C ratios and LOS results for the PM peak period. Under Year 2040 Without Project Conditions, the weighted V/C ratio worsens from 0.890 (LOS D) to 0.955 (LOS E). The percentage of roadway segments operating at LOS E or F increases from 37 to 43 percent. With the implementation of the Proposed Plan under both treatment options and regional growth anticipated in Year 2040, the weighted V/C ratio worsens to LOS F, and the percentage of roadway segments operating at LOS E or F also increases to 50 percent.

TABLE 4.15-12: PM PEAK PERIOD ROADWAY OPERATIONS				
Transportation Metrics	**Existing 2016 Conditions**	**Future 2040 Without Project**	**Future 2040 With Project Treatment Option 1**	**Future 2040 With Project Treatment Option 2**
Weighted Average V/C	0.890 (LOS D)	0.955 (LOS E)	1.002 (LOS F)	1.017 (LOS F)
Percentage (%) of Street Segments at LOS E or F	37%	43%	50%	50%
Percentage (%) of Center-Line Miles at LOS E or F	37%	41%	47%	47%
WEIGHTED AVERAGE V/C BY FACILITY TYPE				
Boulevard / Parkway	1.186 (LOS F)	1.200 (LOS F)	1.198 (LOS F)	1.200 (LOS F)
Avenue	0.870 (LOS D)	0.938 (LOS E)	0.993 (LOS E)	1.010 (LOS F)
Local / Collector	0.922 (LOS E)	0.999 (LOS E)	0.923 (LOS E)	0.937 (LOS E)
SOURCE: Fehr & Peers, 2019.				

The V/C ratios within the study area are presented in **Figure 4.15-8** for the AM Peak Period and in **Figure 4.15-9** for the PM Peak Period under Treatment Option 1.

The V/C ratios under Treatment Option 2 are presented in **Figure 4.15-10** and for the AM Peak Period and in **Figure 4.15-11** for the PM Peak Period.



Segment Level of Service

- Acceptable Operations (V/C < 0.80)
- Approaching Capacity (V/C 0.80 - 0.90)
- Approaching or Over Capacity (V/C > 0.90)

SOURCE: Fehr & Peers, 2019.

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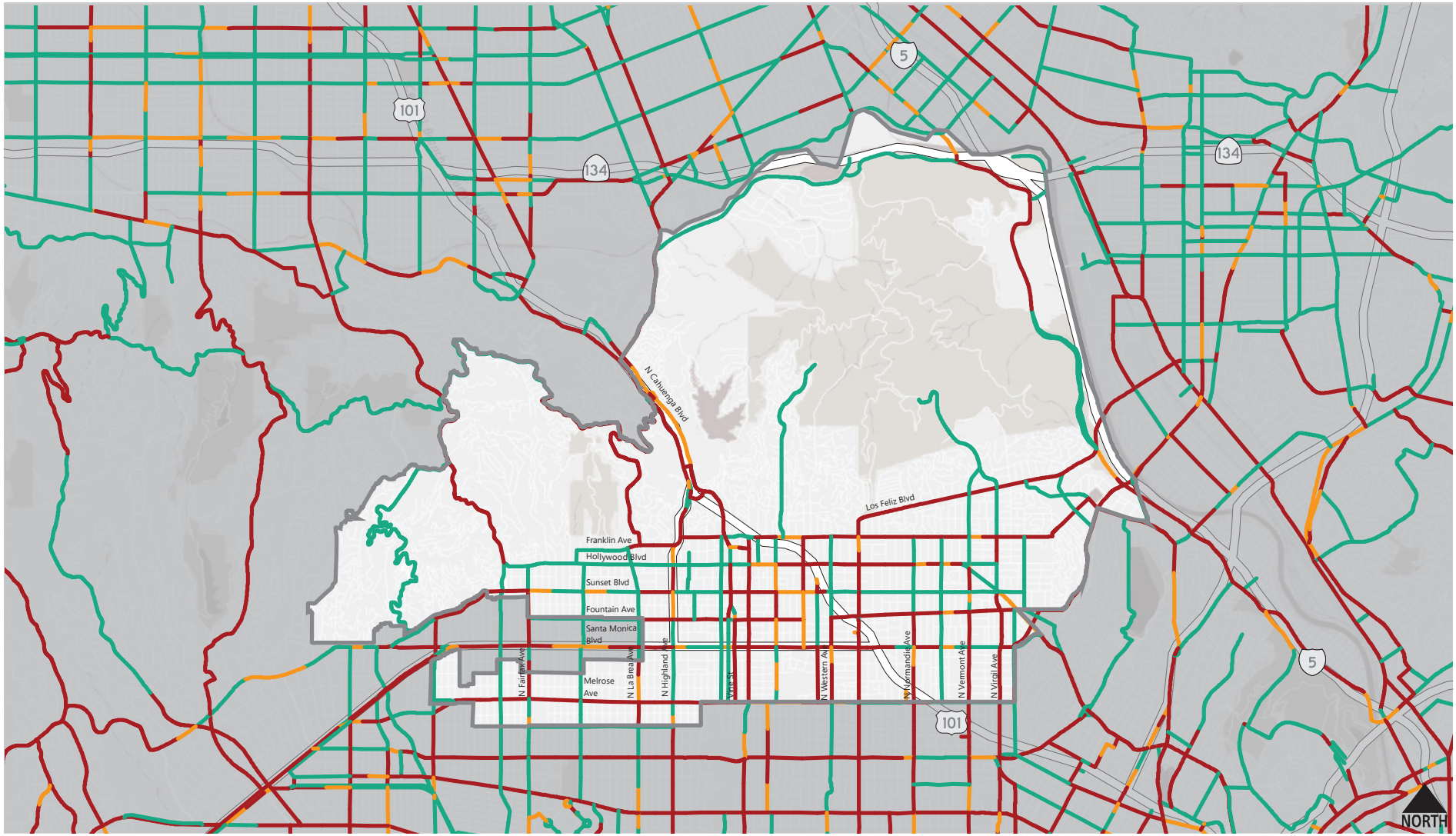
FIGURE 4.15-8

AM PEAK PERIOD LEVEL OF SERVICE:
2040 PROJECT OPTION 1 CONDITIONS



Segment Level of Service

- Acceptable Operations (V/C < 0.80)
- Approaching Capacity (V/C 0.80 - 0.90)
- Approaching or Over Capacity (V/C > 0.90)

SOURCE: Fehr & Peers, 2019.

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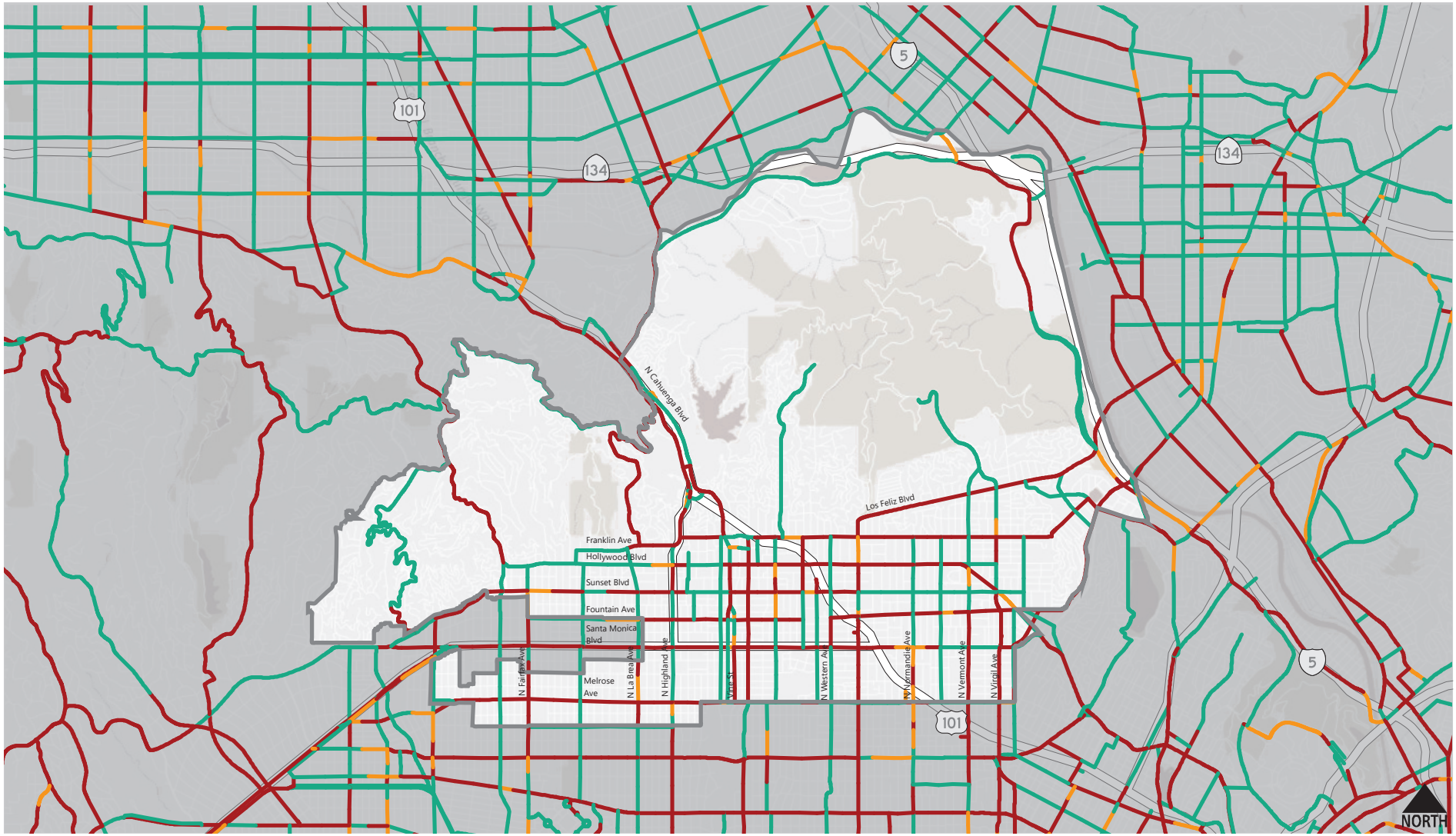
FIGURE 4.15-9

PM PEAK PERIOD LEVEL OF SERVICE:
2040 PROJECT OPTION 1 CONDITIONS



Segment Level of Service

- Acceptable Operations (V/C < 0.80)
- Approaching Capacity (V/C 0.80 - 0.90)
- Approaching or Over Capacity (V/C > 0.90)

SOURCE: Fehr & Peers, 2019.

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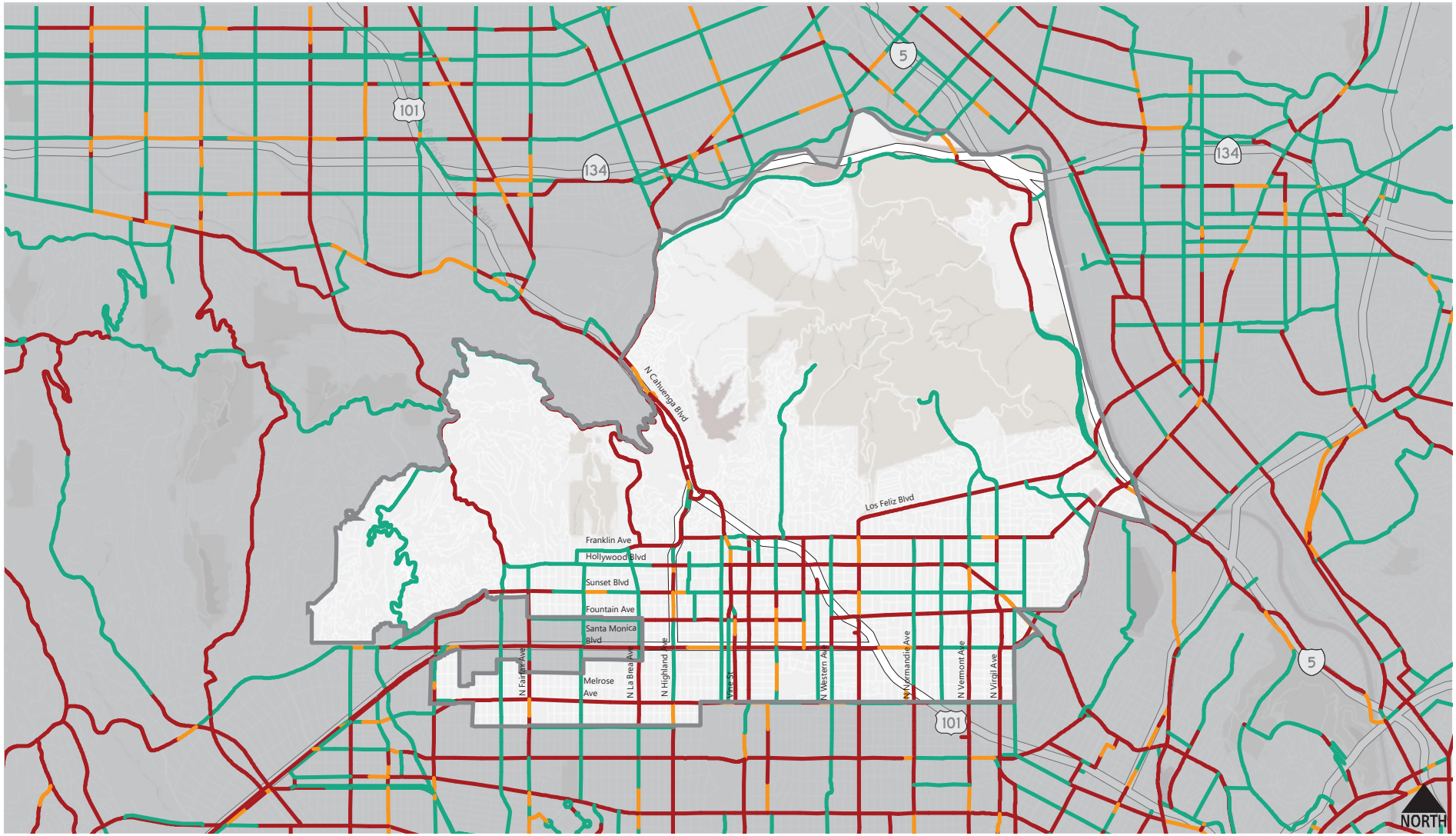
FIGURE 4.15-10

AM PEAK PERIOD LEVEL OF SERVICE:
2040 PROJECT OPTION 2 CONDITIONS



Segment Level of Service

- Acceptable Operations (V/C < 0.80)
- Approaching Capacity (V/C 0.80 - 0.90)
- Approaching or Over Capacity (V/C > 0.90)

SOURCE: Fehr & Peers, 2019.

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FIGURE 4.15-11

PM PEAK PERIOD LEVEL OF SERVICE:
2040 PROJECT OPTION 2 CONDITIONS

Neighborhood Traffic Intrusion. Similar to LOS, neighborhood traffic intrusion was also previously used to determine whether a proposed community land use and transportation network plan resulted in transportation related impacts. Though no longer used as a CEQA threshold, a discussion is included for informational purposes only.

Neighborhood traffic intrusion can be caused by traffic generated by the Proposed Plan, and/or traffic diverted or shifted due to the Proposed Plan onto local streets in residential neighborhoods. Evaluation of potential neighborhood intrusion requires details regarding site access. Therefore, because the routing of traffic to local residential streets depends on the locations of site access points for each development site and those access points cannot be known at this time, the Proposed Plan is assessed qualitatively against the potential for neighborhood traffic intrusion.

Under Future With Project Conditions, the share of roadway street segments projected to operate at LOS E or F exceeds the share for the Existing conditions in the AM and PM peak periods. Although some of this increase is offset by a reduction in vehicular traffic due to shifts to other modes and routes, congestion could increase on certain roadways in the Project Area. In addition, some drivers may divert from the major corridors in the Project Area to parallel routes.

The EIR modeling analysis accounts for potential redistribution of vehicular traffic from highly congested streets to streets that have more available capacity. The cumulative effect of cut-through traffic is accounted for in the model that includes both arterial and non-arterial roadway street segments. Along roadways where the Proposed Plan would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations.

The Proposed Plan and Project List includes programs and policies to address neighborhood traffic intrusion. The Proposed Plan would require future developments to complete the required Traffic Study and Traffic Impact procedures as described in LADOT's *Transportation Assessment Guidelines*. Per the guidelines, a contribution to a traffic calming program or the development of a Neighborhood Traffic Management (NTM) Plan, may be required for future development projects.

Emergency Access Impacts Associated with Roadway Congestion

Within the City of Los Angeles, fire prevention and suppression and emergency medical services are provided by the LAFD. Public protection service and law enforcement are provided by LAPD.

While the Plan would impact segment-level LOS as shown above, there is not a direct relationship between predicted travel delay and response times as California state law does require drivers to yield the right-of-way to emergency vehicles and even permits emergency vehicles to use opposing lane of travel, the center turn lanes, or bus-only lanes. LAFD in collaboration with LADOT has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets in the City.[24] The City of Los Angeles has over 205 miles of routes equipped with FPS. In some instances, roadway reconfigurations with the implementation of the transportation improvements as part of the enhanced network treatments could improve emergency access. For example, a roadway reconfiguration could improve emergency access where a bus-only lane or a contiguous center left-turn lane is introduced where it did not exist. Emergency vehicles are permitted to use bus-only lanes for local access to emergency destinations. People traveling by bicycle are required to pull to the side of the road to

[24] Los Angeles Fire Department, Bulletin No. 133, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles*, October 2008.

yield access to emergency providers regardless if they are traveling in a bus-only lane or in a standard travel lane. It is more likely that when in route to an emergency incident, general traffic will be expected to merge into the bus-only lane, permitting the emergency vehicle to pass in the through lane to the left. Emergency responders also routinely use the center left-turn lanes, or even travel in opposing travel lanes if needed. Generally, multi-lane roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle.

Knowing exactly how fire and emergency service response times will be affected calls for a great deal of speculation. As explained above, it is not possible to exactly predict the Proposed Plan impacts at the street level. This is one factor as to why it is not possible to forecast response times. The other is that, as explained above, the relationship between emergency access and traffic and potential impacts associated with emergency access is complex and involves factors such as the following:

- The proximity of LAFD and LAPD (and other) facilities to those they serve.
- The staffing and equipment at fire stations.
- The opportunity for emergency responders to use alternative routes in an area.
- The specific street configuration. LAFD, in cooperation with LADOT and LADCP, actively participates in the design of specific roadway changes in order to ensure adequate fire/emergency access is maintained. LAFD, in reviewing street and right-of-way projects, comments on particular street configuration designs, and will raise concerns if roadways present particular access challenges, and can recommend no changes be done at all or alternative changes be undertaken if fire and emergency access are particularly impacted.
- As identified in the Thresholds Guide,[25] on any given project review, LAFD can implement project specific mitigation requirements, such as requiring fire retardant landscaping, prohibiting construction in fire hazard areas, requiring design features that reduce fire potential and developing emergency response plans.
- The changing demand for service is complex. For example, with increasing populations there may be more density and more construction, though new buildings are constructed in accordance with increasingly stringent building and fire codes making them safer and more resistant to fires, such as requiring fire sprinklers. The population is aging, which may increase demand for service. But it is also feasible that the population may not need additional service, as healthcare and other technologies evolve and are improved.
- Future factors that could increase efficiencies in response, including improvements in technology and management, such as changes in deployment of equipment and staff and mutual aid agreements.

Average operational response times for Non-EMS (fire and other services) are provided in **Table 4.15-13** for the fire stations in the Hollywood CPA. The structure fire average operational response times are provided in **Table 4.15-4**. Emergency Medical Services (EMS) average operational response times are provided in **Table 4.15-5**. The average citywide response times for these types of calls are fairly constant. Some stations in the CPA also show fairly constant response times. The data for 2019 is only based on the months between January and August and is subject to change once the full year ends in December.

[25] City of Los Angeles, *CEQA Thresholds Guide*, 2006, page K.2-5.

TABLE 4.15-13: LAFD NON-EMS AVERAGE OPERATIONAL RESPONSE TIMES

Year	**Station 27** 1327 N. Cole Ave.	**Station 35** 1601 N. Hillhurst Ave.	**Station 41** 1439 N. Gardner St.	**Station 52** 4957 Melrose Ave.	**Station 56** 2759 Rowena Ave.	**Station 76** 3111 N. Cahuenga Blvd.	**Station 82** 5769 Hollywood Blvd.	**City-wide**
2016	5:40	5:56	7:11	6:04	7:28	7:38	6:31	6:16
2017	5:41	5:59	7:10	5:43	7:56	7:42	6:21	6:24
2018	5:58	5:54	7:27	6:08	7:37	7:38	6:21	6:24
2019 /a/	5:59	5:42	7:29	6:35	7:43	7:50	6:22	6:22

Note: Non-EMS = fire and other services.
/a/ Metrics for 2016, 2017, and 2018 are for January-December; for 2019, the available months were January-August in September.
SOURCE: LAFD, FIRESTATLA, 2019.

TABLE 4.15-14: LAFD STRUCTURE FIRE AVERAGE OPERATIONAL RESPONSE TIMES

Year	**Station 27** 1327 N. Cole Ave.	**Station 35** 1601 N. Hillhurst Ave.	**Station 41** 1439 N. Gardner St.	**Station 52** 4957 Melrose Ave.	**Station 56** 2759 Rowena Ave.	**Station 76** 3111 N. Cahuenga Blvd.	**Station 82** 5769 Hollywood Blvd.	**City-wide**
2016	5:15	4:08	5:13	4:37	4:17	3:00	4:59	5:06
2017	4:46	4:53	5:37	4:58	5:00	4:29	5:24	5:09
2018	4:35	4:40	6:12	4:34	5:27	7:35	5:41	5:00
2019 /a/	5:21	4:21	5:22	5:05	5:31	5:33	4:30	4:59

Note: The structure fire call type is specifically reserved when the LAFD receives a report of a building or structure that is actively burning. Due to the low frequency, these metrics will be reported on a quarterly basis.
/a/ Metrics for 2016, 2017, and 2018 are for January-December; for 2019, the available months were January-August in September.
SOURCE: LAFD, FIRESTATLA, 2019.

TABLE 4.15-15: LAFD EMS (EMERGENCY MEDICAL SERVICES) AVERAGE OPERATIONAL RESPONSE TIMES

Year	**Station 27** 1327 N. Cole Ave.	**Station 35** 1601 N. Hillhurst Ave.	**Station 41** 1439 N. Gardner St.	**Station 52** 4957 Melrose Ave.	**Station 56** 2759 Rowena Ave.	**Station 76** 3111 N. Cahuenga Blvd.	**Station 82** 5769 Hollywood Blvd.	**City-wide**
2016	6:23	6:02	6:45	6:18	7:29	7:46	6:11	6:30
2017	6:24	6:12	6:46	6:19	7:40	7:26	6:26	6:36
2018	6:22	6:09	7:06	6:23	7:27	7:50	6:32	6:36
2019 /a/	6:28	6:05	6:56	6:38	7:34	8:03	6:41	6:39

/a/ Metrics for 2016, 2017, and 2018 are for January-December; for 2019, the available months were January-August in September.
SOURCE: LAFD, FIRESTATLA, 2019.

As discussed in 4.14, Public Services, at 4.14-2, LAFD has a Constitutional mandate to provide fire services as, "the protection of the public safety is the first responsibility of local government." Cal. Const. Art. XIII, Sec. 35, subd. (a)(2). LAFD "preserves life and property, promotes public safety and fosters economic growth through a commitment to prevention, preparedness, response and recovery as an all risk life safety response provider." It is the nation's second busiest provider of Emergency Medical Services (EMS); more than 85% of LAFD's daily responses are related to EMS. The types of medical response calls received range from minor cuts to trauma and heart attacks. The call volume for structure and brush fires is less frequent.

There are seven fire stations located in the Hollywood CPA that serve the flatlands and hillsides communities. With the northern portion of the CPA located in a Very High Fire Hazard Severity Zone (VHFHSZ), as mapped in Figure 4.8-4 in Section 4.8 Hazards and Hazardous Materials of the EIR, the potential for brush fires and wildfires is an ongoing concern. For fire prevention in the VHFHSZ areas, LAFD has the state's strictest brush clearance regulations (year-round brush and/or vegetation clearance of 200 feet from any structure or building), and the City recently adopted additional brush clearance regulations for VHFHSZ areas (Ordinance No. 185789). Brush clearance information and a summary of the new ordinance are available on LAFD's website: https://www.lafd.org/fire-prevention/brush/brush-clearance-requirements. LAFD performs microenvironment weather analysis to check for irregular weather patterns and changes, and is on alert if there are windy days combined with low humidity. LAFD utilizes a Burning Index[26] to determine when to call a Red Flag Day, which occurs on average about eight times a year, and may pre-deploy personnel and apparatus to prepare in the event of a fire.[27] A Red Flag Day is when the potential for a fast-moving brush fire is extremely high, when wind speeds are 25 mph or more and the humidity is 15 percent or less. On those days, illegally parked cars in VHFHSZ areas may be towed because their presence would prevent roadway access needed by LAFD. For more information, https://ers.lafd.org/redflag. LAFD has a massive air response that is ready to deploy; apparatus includes five water-dropping helicopters (the most of any City in the nation).[28] LAFD also has access to additional helicopters, fixed-wing aircraft, bulldozers, and fire engines through mutual aid agreements with the state, County, and other cities in the region. In addition to attacking wildfires from the sky, LAFD also has ground resources, such as fire engines and trucks. For example, Fire Station 82 in Hollywood recently acquired a 4-wheel drive wildland fire engine.

LAFD provides many informational resources regarding fire prevention and emergency preparedness; visit https://www.lafd.org/faqs. Evacuation is a possibility, but depends on the situational nature and direction of a fire, although sheltering in place may be a better call to keep roads free for LAFD access. LAFD has resource maps of different parts of the City that are utilized when evacuation is deemed necessary. LAFD personnel analyzes these maps to strategize the best course of action based on the situation at hand, and the maps are not publicly released in order to prevent misunderstanding or misuse. Evacuation routes are updated as needed and are assessed regularly during the year for changing conditions, such as access.[29] The Hollywood CPA is located within the LAFD Operations West Bureau service area, which encompasses the western portion of the City. Evacuation exercises or drills are conducted on a periodic basis to increase the preparedness and resiliency of residents and the coordination between LAFD and other City departments, such as LAPD, Emergency Management, Transportation, Animal Services, and others, such as utilities providers and the American Red Cross, in case of a large scale emergency. In May 2019, Deputy Chief Armando Hogan, Commander of the West Bureau, led an evacuation exercise in Mandeville Canyon,[30] and is planning one for the hillside communities of Hollywood in the fall of 2019.[31] The Hollywood exercise is anticipated to end with a public safety resource fair, where the public can learn more about emergency preparedness.

In 2015, LAFD published a Strategic Plan 2015-2017, A Safer City, that focuses on nine goals and corresponding strategic actions that would guide the LAFD for the next three years.[32] The primary goals that are applicable to the Project include providing exceptional public safety and emergency service and

[26] LAFD, https://www.lafd.org/news/how-does-lafd-determine-wildfire-danger-los-angeles, accessed September 23, 2019.
[27] Meeting between Department of City Planning and LAFD staff on September 3, 2019.
[28] *Ibid*.
[29] Meeting between Department of City Planning and LAFD staff on September 17, 2019.
[30] LAFD, https://www.lafd.org/news/mandeville-canyon-evacuation-drill, accessed September 20, 2019.
[31] Hollywood Evacuation Exercise Meeting on September 10, 2019. The exercise is planned for November 2019.
[32] LAFD, *Strategic Plan 2015-2017*, http://www.lafd.org/news/lafd-chief-unveils-departments-strategic-plan.

implementing and capitalizing on advanced technologies. Some of the key priorities associated with these goals include:

- Improving response times by utilizing data and metrics to identify gaps in LAFD's response strategies and exploring response time improvements through dialogue, cognitive inquiry, innovation, and follow-up;
- Delivery of emergency medical services by expanding LAFD EMS response capabilities for special events and addressing periods of high vehicle traffic; and
- Identifying and implementing advanced technologies to support and improve performance metrics, tracking standards, data collection, analysis and reporting procedures (FireStatLA).

The LAFD Strategic Plan also focuses on the development of an even more professional workforce, promotion of a positive work environment to address risk management issues, and strengthening community relationships to improve preparedness and enhance resiliency during emergency events.

In 2018, LAFD released the new Strategic Plan 2018-2020, A Safer City 2.0, which reports that since the previous Strategic Plan was released, LAFD has hired hundreds of new firefighters, implemented the Four Bureau Reorganization, and created innovative resources such as the Advanced Provider Response Unit (APRU) and the Fast Response Vehicle program as well as other pilot programs.[33] The new Strategic Plan has updated goals that are more refined. The five goals are 1) Provide exceptional public safety and emergency service, 2) Embrace a healthy, safe and productive work environment, 3) Capitalize on Advanced Technology, 4) Enhance LAFD sustainability and community resiliency, and 5) Increase opportunities for personal growth and professional development. Goal 1 includes improving emergency response times, the delivery of EMS, resource deployment and readiness to respond to disasters. Goal 1 includes an objective to complete the Standards of Cover deployment analysis to determine the optimal distribution and concentration of resources and ensure a safe and effective response force for fire suppression, EMS and specialty response situations. The recommendations from the Standards of Cover are expected to be identified based on different geographic areas in the City; the Standards of Cover study was funded in the City's 2019-2020 budget and is expected to be completed within the next few years.[34]

In the interim, LAFD has been implementing innovative resources and pilot programs especially in relation to public health. By addressing EMS related incidents with new resources, such as specialized medical units, other resources, such as fire engines and fire trucks and associated personnel, would be able to be utilized to respond to other incidents, such as fires or other emergencies. This strategy is for better resource deployment and to help reduce response times.[35] In Hollywood, Fire Station 82 has one of the City's five APRU units, which consist of a physician's assistant or nurse practitioner working alongside a firefighter-paramedic. This unit can provide medical treatment in the field, such as stitches and lab work, and determine if patients can be treated in the field without being transported to a hospital. In other instances, such as during special events or as needed, LAFD can and has utilized medics riding bicycles to respond to incidents. For special events, LAPD and LAFD develop individual emergency action plans in coordination with the City's Department of Transportation (DOT) and the Emergency Management Department (EMD). EMD staff will support the first responders as needed during the special event. In addition to being involved with planning for special events, EMD has 45 individual plans for various emergencies, including natural disasters and terrorism, and EMD staff is regularly on call in the event LAPD or LAFD notifies them for

[33] LAFD, Strategic Plan, 2018-2020, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed September 23, 2019

[34] Meeting between Department of City Planning and LAFD staff on September 3, 2019; City of Los Angeles Budget Summary FY 2019-2020: http://cao.lacity.org/budget19-20/2019-20Budget_Summary.pdf, accessed September 24, 2019.

[35] Meeting between Department of City Planning and LAFD staff on September 3, 2019.

activation.[36] Summary information about hazard mitigation in the City is available online; EMD managed the comprehensive update of the City's 2018 Local Hazard Mitigation Plan.[37]

In 2015, Planning Department staff discussed the LAFD Strategic Plan and its relationship to growth and traffic with LAFD staff in order to understand how LAFD responds to growth and changes in traffic.[38] LAFD advised that although increasing congestion is a factor in how they address emergency response, their ongoing planning efforts, including the LAFD Strategic Plan take in to account such increases in congestion and LAFD continues to plan for and maintain public safety and emergency service as required. LAFD monitors any impact on-the-ground implementation of the Proposed Plan may have on response times and make adjustments as necessary. These adjustments may or may not include redeploying resources, adding staff or building new fire stations. In the summer of 2019, Planning Department staff met with LAFD staff on the same topic due to public comments received about congestion and emergency response.[39] LAFD staff indicated that there are ongoing assessments of increases in call load or types of calls throughout the City, and LAFD continuously makes resource and deployment adjustments to address these changes, such as hiring additional medical personnel, acquiring new apparatus or flex staffing of personnel during the busiest hours of the day. LAFD staff said incremental changes are currently being addressed but the pending Standards of Cover is expected to have new recommendations for the long term. The Standards would include levels of staffing of firefighters and other personnel, target response times, new facilities and apparatus needed by geography, and address a City where development is expected to become denser and taller around transit infrastructure systems.

LAFD has some adopted response times that are consistent with the response times stated in the National Fire Protection Association guidelines, including call processing, turnout for EMS and non-EMS calls, and travel. LAFD holds regular FireStat meetings to review response times throughout the City. These meetings include battalion chiefs and captains from the four Geographic Bureaus (Central, South, Valley, and West) and the Administrative Bureaus in the City, and uses the FireStat data to exercise performance management and spot trends to adjust practices, methods or identify other solutions to maintain response times. Metrics are compared between stations and even across shifts or platoons to determine if there is an issue and to continue always to work on reducing all response times to get closer to the NFPA guidelines. If response times are shown to be increasing, battalion chiefs and captains will be tasked with identifying the reason and put in place mediations to resolve the issue. For example, if it is shown that one platoon is managing a four-minute average response and another platoon at the same station in similar conditions has an average response time of four and a half minutes, the responsible officers for the station will need to determine why one platoon is doing better than another, such as whether one platoon is taking a different route, and resolve the differences to improve the slower numbers. If the factors are external to LAFD, LAFD will coordinate with other City departments, such as LADOT or ITA to adjust street light timing, or look for completely new solutions, in order to improve response times. In general, LAFD is constantly monitoring FireStat and utilizing all available resources so that appropriate and feasible response times are being maintained.

[36] Meeting between Department of City Planning and EMD staff on October 1, 2019.

[37] City of Los Angeles 2018 Local Hazard Mitigation Plan: https://emergency.lacity.org/sites/g/files/wph496/f/2018_LA_HMP_Final_2018-11-30.pdf, accessed October 8, 2019.

[38] Meeting between Department of City Planning and LAFD staff on September 8, 2015.

[39] Meetings between Department of City Planning and LAFD staff on April 29, June 13, July 2, September 3, and September 17, 2019.

Many members of the public focus on response times as operational measures to assess system performance[40] or believe that faster response times mean better patient outcome.[41] Nationwide, the most widely referenced response time standard for advanced life support (ALS) incidents in urban settings has been for emergency responders to respond within 8 minutes and 59 seconds, when including call processing time, for 90 percent of incidents. The National Fire Protection Association *1710 Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations and Special Operations to the Public by Career Fire Departments* is for an ALS unit to respond within 8 minutes to 90 percent of incidents, without including call processing time (Fitch, 2010). This response goal time has been commonly cited since Dr. Mickey Eisenberg published a study in 1979, which concluded that survival from cardiac arrest is maximized if the time between collapse to receiving CPR is four minutes and the time from collapse to receiving definitive care (e.g. defibrillation) is 8 minutes, which has led to a widespread goal of an 8-minute response for ALS units responding to life-threatening emergencies (Blanchard et al., 2012).

Newer studies have questioned the 8-minute response time goal and are concluding that additional studies are needed for several reasons. "Intuitively, reducing the response time would potentially decrease morbidity and improve survival for many categories of illness and injury. The benefit associated with a standardized, quantitative time reduction, however, remains speculative."[42] Several authors point out that more laypersons now know how to administer CPR and the availability of automated external defibrillators (AED) has increased over time. A 2002 study (Blackwell and Kaufman) concluded there is some evidence for increased survival associated with response times of less than five minutes and there was no statistically significant difference for response times between 5 and 10 minutes. A 2005 study (Pons, et al.) states that in most EMS systems cardiac arrest is less than 1% of calls, only limited studies have been published for recommended ambulance response times for non-cardiac arrest, and suggests that a response time of 4 minutes or less for patients with intermediate or high risk of mortality is correlated with increased survival.[43] The same 2005 study says the 8-minute response time should be re-evaluated because of improved EMS systems and first responder training. Both the 2002 (Blackwell and Kaufman) and 2005 (Pons, et al.) studies also point out the significant financial cost of resources that would be required to implement reduced response times of five minutes or four minutes; the 2002 study provides a cost-benefit ratio comparison. Blanchard's 2012 publication references the 2005 study and also discusses that cardiac arrest is only a small portion of ALS incidents; the optimal response time for non-cardiac arrest patients is unknown; and whether 8 minutes may be too long of a response time for cardiac arrest. Others have also questioned whether the Red Lights Siren (RLS) response is a good approach considering that motor vehicle fatality is higher for emergency medical personnel; literature review acknowledgment that CPR and early defibrillation and response times correlate with improved survival but whether the 8 minute 59 seconds response standard correlates with improved survival; and, what would be the best time window for most patients. [44]

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[40] Fitch, Jay. "Response Times: Myths, Measurement and Management." *The Journal of Emergency Medical Services*, 31 Aug. 2005. https://www.jems.com/2005/08/31/response-times-myths44-measure/, accessed September 24, 2019.

[41] Ian E. Blanchard, Christopher J. Doig, Brent E. Hagel, Andrew R. Anton, David A. Zygun, John B. Kortbeek, D. Gregory Powell, Tyler S. Williamson, Gordon H. Fick & Grant D. Innes (2012) Emergency Medical Services Response Time and Mortality in an Urban Setting, Prehospital Emergency Care, 16:1, 142151. http://www.emdac.org/docs/Blanchard_EMS%20Times%20&%20Mortality_PrehospEmergCare_2012.pdf accessed September 24, 2019.

[42] Blackwell, T. H. and Kaufman, J. S. (2002), Response Time Effectiveness: Comparison of Response Time and Survival in an Urban Emergency Medical Services System. Academic Emergency Medicine, 9: 288-295. https://onlinelibrary.wiley.com/doi/epdf/10.1197/aemj.9.4.288 accessed September 24, 2019.

[43] Peter T. Pons MD, Jason S. Haukoos, MD, MS, Whitney Bludworth MD, Thomas Cribley EMT-P, Kathryn A. Pons RN, Vincent J. Markovchick MD (2005) Paramedic Response Time: Does It Affect Patient Survival? Academic Emergency Medicine, July 2005, Vol. 12, No. 7. https://onlinelibrary.wiley.com/doi/epdf/10.1197/j.aem.2005.02.013 accessed September 24, 2019.

[44] Osama Antar MD, S. Marshal Isaacs MD, FACEP, FAEMS, Carla Cash MD, and Raymond L. Fowler MD. "The Case Against EMS Red Lights and Siren Responses." *The Journal of Emergency Medical Services,* 31 Jan. 2017. https://www.jems.com/2017/01/31/the-case-against-ems-red-lights-and-siren-responses/, accessed September 24, 2019.

LAFD publishes average operational response times citywide and by specific fire stations online through FIRESTATLA: http://www.lafd.org/fsla/stations-map, and was the first fire agency in the United States to release response times to the public.[45] ALS operational response times are provided for the full calendar year (January through December) starting with the year 2016; when this document was prepared in September 2019, the data available through FIRESTATLA online for 2019 was January through August. Operational response time is the time interval that starts when first contact is made (either through 911 or the fire dispatch center) and ends when the first Standard Unit arrives on-scene. A Standard Unit has the capacity or equipment to administer the full suite of lifesaving services.[46] Average ALS operational response times for the City and for the seven stations in the Hollywood CPA is less than the 8-minute 59 seconds standard, including call processing time. See **Table 4.15-16**.

TABLE 4.15-16: LAFD ADVANCED LIFE SUPPORT (ALS) AVERAGE OPERATIONAL RESPONSE TIMES

Year	**Station 27** 1327 N. Cole Ave.	**Station 35** 1601 N. Hillhurst Ave.	**Station 41** 1439 N. Gardner St.	**Station 52** 4957 Melrose Ave.	**Station 56** 2759 Rowena Ave.	**Station 76** 3111 N. Cahuenga Blvd.	**Station 82** 5769 Hollywood Blvd.	**City-wide**
2016	5:12	4:54	5:55	5:21	6:45	6:53	5:16	5:35
2017	5:23	5:13	5:43	5:24	6:58	6:31	5:27	5:40
2018	5:22	5:15	5:56	5:40	6:40	7:16	5:38	5:42
2019 /a/	5:32	5:19	5:55	5:43	6:47	6:59	5:54	5:44

/a/ Metrics for 2016, 2017, and 2018 are for January-December; for 2019, the available months were January-August in September.
SOURCE: LAFD, FIRESTATLA, 2019.

See **Figure 4.14-1** for a map of the fire stations in the Hollywood CPA in Section 4.14 Public Services. For general reference, Station 27 and Station 82 are in central Hollywood; Station 35 is in the Los Feliz area; Station 41 is in the western part of the CPA; Station 52 is in the southern part of Hollywood; Station 56 is in Silver Lake; and Station 76 is in the Cahuenga Pass.

From the data, the average operational response times for ALS incidents for the seven fire stations in the CPA have generally slightly increased in recent years, but remain under the 8 minutes 59 seconds standard. It would be speculative to conclude or quantify the impact of increased response times but for persons experiencing out-of-hospital cardiac arrest, every minute without life-saving CPR and defibrillation, chances of survival decrease 7% to 10% (American Heart Association).[47] There does not appear to be any universally accepted standards for quantifying survival rates and emergency response times, and more studies are needed on recommended emergency response times for cardiac arrest and other types of medical situations.

Based on all of the above, it is not reasonably foreseeable that the City will not continue to stay below the 8 minutes and 59 second standard for average emergency response times in the Plan Area in consideration of the increasing congestion in the Plan Area identified above. Moreover, it is not reasonably foreseeable that LAFD will not continue to meet its own mission statement and constitutional mandate to provide necessary fire and emergency services to the residents and visitors of the City. LAFD is currently preparing a Standards of Cover that will establish the City's response time standard and identify the facilities,

[45] Government Technology, https://www.govtech.com/data/Los-Angeles-First-in-US-to-Post-Fire-Response-Times-Online.html, accessed September 24, 2019.

[46] LAFD, F*IRESTATL*A, http://www.lafd.org/how-we-calculate-results, accessed September 23, 2019.

[47] American Heart Association Fact Sheet: *A Race Against the Clock Out of Hospital Cardiac Arrest (2014)*, https://www.heart.org/-/media/files/about-us/policy-research/fact-sheets/out-of-hospital-cardiac-arrest.pdf?la=en&hash=66774CD854D032774F5337934712865D5B1CE3DC, accessed September 24, 2019.

equipment and staff to maintain that response time, including in consideration of increasing congestion identified above. Additionally, LAFD continues to develop, obtain and innovate new methods, resources and equipment to meet the needs of the City for fire and emergency response, including in the Plan Area.

Based on the above, the impact of the Proposed Plan on emergency medical services and fire protection and police protection would be ***less than significant without mitigation***.

Mitigation Measures

No mitigation measures are necessary.

Significance of Impacts after Mitigation

Less than Significant.

CUMULATIVE IMPACTS

Cumulative impacts are those environmental effects that, on their own, may not be considered adverse, but when combined with other projects over time, result in substantial adverse effects. Cumulative effects are an important part of the environmental analysis because they allow decision makers to look not only at the impacts of an individual project, but the overall impacts to a specific area over time from many different projects. CEQA requires an analysis of cumulative impacts resulting from the implementation of the Proposed Plan along with other related projects anticipated to occur in the same geography and timeframe.

Cumulative transportation and traffic impacts consider regional population, housing and employment growth projections prepared by SCAG and found in the 2016-2040 RTP as well as growth anticipated in the Project Area. The RTP also includes a Sustainable Communities Strategy (SCS) that provides guidance on land use planning and transportation to ensure that the region meets CARBs region-specific GHG reduction goals. The RTP also includes large-scale transportation improvements to show how linking transportation and land use planning can reduce automobile trips and greenhouse gas emissions. The 2016-2040 RTP/SCS identifies transportation corridors and transit routes, High Quality Transit Areas (HQTAs), and a variety of strategies to be employed across the region.

MP 2035 AND SCAG 2016-2040 RTP/SCS CONSISTENCY

The adopted City of Los Angeles Mobility Plan 2035 (MP 2035) could have overlapping impacts with the Proposed Plan. In August 2015, the City of Los Angeles adopted MP 2035. MP 2035 (formerly the Transportation Element of the City's General Plan) is the transportation blueprint for the City of Los Angeles. MP 2035 identifies a number of changes to the City's circulation system, including policies, an Enhanced Complete Street System, an Action Plan, a Complete Streets Design Guide, and a revised Bicycle Plan, all of which will influence the network conditions in the Plan Area and adjacent areas in the City of Los Angeles.

MP 2035 provides the framework for future community plans and specific plans, which take a closer look at the transportation system in specific areas of the City and recommend more detailed implementation strategies to realize MP 2035. MP 2035 was prepared in compliance with the 2008 Complete Streets Act, which mandates that the circulation element of a city's General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

The Proposed Plan contains a Project List that reflects the vision of MP 2035 and the analysis above considers two options for implementing MP 2035 in the Project Area; however, the Future 2040 transportation impact analysis does not reflect full buildout of MP 2035 in adjacent areas of the City of Los Angeles. In the remaining portion of the City of Los Angeles outside the Plan Area, buildout of MP 2035 was not included in the Future with Proposed Plan analysis because, although MP 2035 has been adopted, the timing of implementation has not yet been identified. However, the cumulative impacts analysis considers the impacts of the Proposed Plan in conjunction with full buildout of MP 2035 throughout the City of Los Angeles.

The Proposed Plan would not make a substantial contribution to any cumulative impacts related to MP 2035 or SCAG 2016-2040 RTP/SCS consistency.

CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B) CONSISTENCY

The Proposed Plan meets the City adopted threshold of not exceeding baseline conditions and not exceeding 15% below the SCAG regional average, and therefore, does not create a transportation impact itself. While this Plan cannot be used to determine the impact of individual development projects or adjacent community plans, the inclusion of the regionally used future forecasts accounts for potential cumulative impacts in this analysis. Therefore, the Proposed Plan would not have a substantial contribution to any cumulative impacts related to the VMT projections, and would therefore maintain consistency with CEQA Guidelines Section 15064.3, Subdivision (b).

HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE OR INCOMPATIBLE USES

The Proposed Plan does not include any elements that would promote sharp curves, dangerous intersections, or incompatible uses that could present safety hazards, and promotes policies and programs to encourage safety of users across all modes. Though the Proposed Plan describes a reasonably expected future and cannot constitute a commitment to any project-specific development, individual projects would be expected to align with the safety principles of the Proposed Plan as well. Therefore, the Proposed Plan would not have a cumulatively considerable contribution to any significant cumulative impact related to hazardous geometric design features or incompatible uses.

EMERGENCY ACCESS

The Proposed Plan would increase traffic in the Plan Area, which could result in potential delays for emergency vehicles. However, while the MP2035 includes proposed roadway changes, they do not provide intersection-level detail in the Plan Area. It is feasible that some of these improvements to the network would provide benefits to emergency access as well. As noted above, the Department of City Planning staff have discussed the LAFD Strategic Plan and its relationship to growth and traffic with LAFD staff. While LAFD acknowledged the possible effects of congestion on their efforts, their ongoing planning efforts and new Strategic Plan consider increased congestion and the possible adjustments necessary. These adjustments may include redeploying resources, adding staff, or building new fire stations as deemed necessary. LAFD will continue to monitor growth in the Plan Area and any impact they see will be addressed when needed. Therefore, the Proposed Plan would not have a cumulatively considerable contribution to a significant cumulative impact related to emergency access.

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5.0 ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or substantially lessen significant environmental impacts while attaining most of the basic objectives of the project.[1] This chapter sets forth potential alternatives to the Proposed Plan and provides a qualitative analysis of each alternative and a comparison of each alternative to the Proposed Plan. The Proposed Plan alternatives are evaluated as to how well they achieve the goals, policies, and objectives, the extent of their environmental impacts compared to the Proposed Plan, and whether or not they reduce or eliminate significant impacts caused by the Proposed Plan.

5.1 CEQA REQUIREMENTS

CEQA Guidelines Section 15126.6 states:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.

- The discussion of alternatives shall focus on alternatives to the project, including alternative locations that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6(b)).
- The EIR shall include a brief discussion of the rationale for selecting alternatives to be discussed and should identify any alternatives that were considered but were rejected as infeasible during the scoping process and briefly explain the reason underlying the lead agency's decision. Among others, the following factors may be used to eliminate alternatives from detailed consideration in an EIR: (1) failure to meet most of the basic project objectives; (2) infeasibility, or (3) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6(c)).
- The No Project Alternative shall be evaluated along with its impacts. The "no project" alternative analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services (CEQA Guidelines Section 15126.6(e)(2)).
- When the project involves an update to an existing land use or regulatory plan, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. The projected impacts of the Proposed Plan are compared to the impacts from the continuation of the existing plan (CEQA Guidelines Section 15126.6(e)(3)(A)).

[1] *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Section 15126.6, 2005.

- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project (CEQA Guidelines Section 15126.6(f)).
- For alternative locations, only locations that are feasible and would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. CEQA Guidelines Section 15126.6(f)(2)(A)).
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines Section 15126.6(f)(3)).
- The evaluation of alternatives should include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the proposed project (CEQA Guidelines Section 15126.6(d)).
- CEQA Guidelines Section 15126.6(a) states:

  An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic project objectives but would substantially lessen any of the significant effects of the project," and specifies that, "An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are not feasible.

- CEQA Guidelines Section 15126.6(f)(1) explains that

  …factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative sites…

  Additionally, CEQA Guidelines Section 15126.6(f)(3) clarifies that,

  Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration.

Accordingly, the lead agency may make an initial determination as to which alternatives are feasible, and therefore, merit in-depth consideration. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet project objectives, are infeasible, or do not avoid any significant environmental effects.

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6(f)(1)) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

The City of Los Angeles Department of City Planning's (DCP's) effort in this process has been to identify, describe, and evaluate a reasonable range of feasible project alternatives with the same focus as the Proposed Plan, and inform the public and decision-makers of the comparative effects of alternatives that address concerns expressed by the public during the outreach process for the development of the Proposed Plan. The analysis is particularly focused on those alternatives that could achieve most of the project objectives.

5.2 PROJECT OBJECTIVES

As described in Section 3.2 in Chapter 3.0, Project Description, the underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the Hollywood CPA, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of Senate Bill 375 and the Southern California Association of Governments' (SCAG) Sustainable Communities Strategy (SCS).

The **primary objectives** of the Proposed Plan are as follows:

- Accommodate projected population, housing, and employment growth consistent with the growth strategies of the Framework Element, including:
  - Maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts,
  - Direct growth to transit hubs and corridors,
  - Plan for increases to the housing supply,
  - Encourage a better balance of jobs and housing with mixed-use development,
  - Accommodate commercial uses for future employment opportunities, and
  - Focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space.
- Direct growth away from low-density neighborhoods; preserve single-family and low-density residential neighborhoods.
- Provide a range of employment opportunities; promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.
- Protect historic and cultural resources.

The **secondary objectives** of the Proposed Plan are as follows:

- Encourage and promote a variety of mobility options; make streets walkable.
- Improve the function and design of neighborhoods throughout the Project Area by preserving and strengthening the appearance of the overall Project Area to promote pedestrian-friendly environments, nurture neighborhood character, improve economic vitality, create identity, and integrate a combination of land uses to create positive visual experiences.
- Improve open space, parks and public spaces.
- Provide adequate public services and infrastructure.
- Encourage sustainable land use.
- Maintain Land Use and Zoning Consistency.

5.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

As described in Chapter 4, the following impacts related to the Proposed Plan are determined to be significant and unavoidable after implementation of all feasible mitigation measures:

- **Air Quality**: Criteria Pollutant Emissions and Violation of Air Quality Standards; Construction for NOx, $PM_{2.5}$, PM_{10}; Operational for VOC emissions; Cumulative Criteria Pollutant Emission and Cumulative Air Quality Standard Impacts; Sensitive Receptors for Construction.
- **Biological Resources:** Special Status Species Habitat, Riparian Habitat, Wetlands, Migratory Wildlife.
- **Cultural Resources**: Historical Resources; Cumulative Historical Resources.
- **Noise**: Construction Noise and Construction Vibration; Cumulative Construction Noise and Construction Vibration; Permanent Stationary Sources.
- **Public Services**: Parks – Deterioration; Cumulative Parks - Deterioration.

As described in Chapter 4.0, the following impacts are considered significant impacts that can be mitigated to less than significant with mitigation.

- **Aesthetics** (Glare)
- **Cultural Resources** (Archaeological Resources, Paleontological Resources, and Tribal Cultural Resources)
- **Hazardous and Hazardous Materials** (Hazardous Materials Upset or Accident, Hazardous Materials Upset or Accident, and Hazardous Materials Sites)

5.4 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER EVALUATION

The alternatives considered and eliminated from further evaluation include:

NO DEVELOPMENT ALTERNATIVE

The No Development Alternative would permanently freeze development in the Hollywood Community Area by prohibiting all construction activity. Since the Hollywood CPA is subject to the existing 1988 Hollywood Community Plan, which allows redevelopment and future growth within specific use, density and height restrictions (see the discussion of the No Project Alternative below), the No Development Alternative does not represent a scenario that would likely occur. The City has no current mechanisms to halt development within the Project Area. In addition, this Alternative would not accommodate the projected housing, population, and job growth for the Project Area and would not accomplish the underlying purpose of the Proposed Plan and most of the primary project objectives. Therefore, the No Development Alternative is not a realistic or foreseeable option and was rejected as infeasible.

LIMITED DEVELOPMENT ALTERNATIVE

Under a Limited Development Alternative, land use changes would be limited to General Plan Amendments and zone changes necessary to adjust the existing development potential of the Project Area downward to reflect as-built conditions, therefore limiting the future development potential. While this Alternative would involve carrying the existing conditions of the Project Area forward into the future for the most part, unlike the No Development Alternative, this is an "action alternative" that would include the adoption of

an updated community plan. This Alternative would reduce the Project Area's development potential, limiting and deterring new development from occurring in the future. Given this reduction in development potential, new construction would be less likely to occur under this Alternative than under the Proposed Plan or the Existing Plan, thereby reducing construction impacts (construction would be permitted to replace existing structures or vacant lots with similar structures). Similarly, because development potential of the Project Area would be reduced compared to the Existing Plan and Proposed Plan, only a limited amount of population and job growth could be accommodated, thereby reducing operational impacts compared to the Proposed Plan. However, this Alternative would not accommodate the projected housing, population, and job growth for the Project Area and would not accomplish the underlying purpose of the Proposed Plan and most of the primary project objectives, as it would not direct growth to transit hubs and corridors, balance jobs and housing growth and create employment opportunities, or have regulations to protect designated and eligible historic resources and promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry. This Alternative could put pressure on lower scale neighborhoods to accommodate housing demand that is not met in the Regional Center and along commercial corridors. Based on the above, the Limited Development Alternative was rejected as infeasible.

UNIFORM CORRIDOR GROWTH ALTERNATIVE

Under the Uniform Corridor Growth Alternative, new development potential at a level consistent with the Proposed Plan would be distributed uniformly along commercial corridors within the Project Area. While this Alternative would accommodate the SCAG projected growth for the Project Area, distributing growth uniformly along the corridors of the Hollywood CPA would not reduce the significant and unavoidable impacts of the Proposed Plan. In addition, distributing growth consistently along the corridors would not achieve the City's goals of maximizing development opportunities around existing transit systems while preserving single-family and low-density residential neighborhoods. Also, there would likely be increased vehicle miles traveled (VMT), as future growth would not be concentrated at existing transit stations and bus corridors and any emerging transportation hubs where residents, employees and visitors can take advantage of existing and planned transit opportunities. Accordingly, this Alternative would likely result in greater impacts than the Proposed Plan, particularly exacerbated along corridors abutting low-density neighborhoods, and would not achieve the underlying purpose of the project to accommodate growth consistent with the City's Framework long-term growth strategy and the SCS, as well as several of the primary and secondary objectives related to preserving single-family and low-density residential neighborhoods, protecting historic and cultural resources, and promoting the vitality and expansion of Hollywood's media, entertainment, and tourism industry. Based on the above, the Uniform Corridor Growth Alternative was rejected as infeasible.

OTHER ALTERNATIVES

As discussed below there are no alternatives that the City can identify that would reduce the identified significant and unavoidable impacts identified in this EIR to less than significant that would meet the underlying purpose of the project to plan for and accommodate foreseeable City growth in the Hollywood CPA, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of Senate Bill 375, Senate Bill 743, and SCAG's Sustainable Communities Strategy. All of the significant and unavoidable impacts and less than significant impacts with mitigation that are identified in this EIR are a result of reasonably expected development that occurs with growth, such as construction noise and vibration, potential for release of hazardous materials in the soil, or discovery of archaeological resources discovered during site preparation. That is why even the No Project alternative and the reduced growth alternative (Alternative 2) would not be expected to result in less than significant to any of the identified significant and unavoidable impacts upon analysis. As discussed above, to the extent that a no development or lower development alternative could stop or slow growth in the CPA such that it would result in turning the significant and unavoidable impacts to less than significant because little to no development would occur are rejected for not meeting the underlying purpose of the Project. Based upon

the above, the range of reasonable alternatives that can meet the requirements of CEQA for the Proposed Project are significantly constrained by the need for the City to accommodate growth and the nature of the impacts identified in large part resulting from growth. To comply with CEQA, as discussed in Section 5.5 below, the City has provided a reasonable range of alternatives that would meet the requirements of Guidelines Section 15126.6 discussed above. The City finds that any variations on those alternatives that the City considered including, such as additional lower density alternatives, would not avoid any additional significant environmental impacts, and would not further foster informed decision-making or public participation beyond the alternative considered in the EIR.

5.5 ALTERNATIVES CONSIDERED IN THIS EIR

In accordance with CEQA Guidelines Section 15126.6, the feasible alternatives to the Proposed Plan are presented below.

ALTERNATIVE 1: CONTINUATION OF EXISTING PLAN (NO PROJECT ALTERNATIVE)

CEQA Guidelines Section 15126.6(e) requires that a No Project Alternative be evaluated to allow decision makers to compare the impacts of approving the project with the impacts of not approving the Proposed Plan. This legally mandated alternative is not required to meet the objectives of the Proposed Plan or to substantially lessen any of the significant effects of the Proposed Plan. The No Project Alternative reflects "no project" conditions (i.e., without the adoption of the Proposed Plan). Under the No Project Alternative, no changes to General Plan land use designations and/or zoning would occur, the CPIO District would not be established, and future development would not be subject to the Proposed Plan's development regulations, design regulations, or policies. The No Project Alternative assumes what would be reasonably expected to be developed under the Existing Plan, based on existing General Plan land use designations and zoning in the Hollywood CPA. Based on existing zoning under the Existing Plan's land use designations, the reasonably expected growth in the Hollywood CPA under the No Project Alternative would result in 113,000 to 121,000 housing units, 226,000 to 243,000 residents, and 119,000 jobs.

Table 5-1 shows the population, housing and employment that could be accommodated under the five Alternatives, including the No Project Alternative. The No Project Alternative would result in 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer residents, and 5,000 to 8,000 fewer jobs compared to the Proposed Plan. The Transit Oriented Communities (TOC) Guidelines, along with other housing incentive programs like Density Bonus and Accessory Dwelling Units, have been accounted for in the total reasonably expected development potential of each alternative except Alternative 5 (SCAG Forecast Alternative). A range of numbers is used in Alternatives 1 through 4 to represent the potential increase in development from the optional incentive programs.

TABLE 5-1: COMPARISON OF PROJECT ALTERNATIVES

	Existing Conditions (2016)	SCAG Forecast (2040)	Proposed Plan	Alternative 1: No Project	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors	Alternative 4: High TOD	Alternative 5: SCAG Forecast Alternative
Population (residents)	206,000	226,000	243,000 – 264,000	226,000 – 243,000	230,000 – 256,000	243,000 – 264,000	243,000 – 264,000	226,000
Housing Units	104,000	113,000	121,000 – 132,000	113,000 – 121,000	115,000 – 128,000	121,000 – 132,000	121,000 – 132,000	113,000
Employment (jobs)	101,000	119,000	124,000 - 127,000	119,000	124,000 – 127,000	124,000 – 127,000	124,000 – 127,000	119,000

The Proposed Plan and all of the Alternatives except Alternative 5 factors in additional units that can be expected from the City's housing incentives. TOC and accessory dwelling units are represented in the higher range. It assumes all units are occupied.

SOURCE: City of Los Angeles, 2018.

ALTERNATIVE 2: REDUCED TOD AND CORRIDORS ALTERNATIVE (REDUCED ALTERNATIVE)

The Reduced TOD and Corridors Alternative (Reduced Alternative) focuses development potential at selected transit stations and corridor areas of the Hollywood CPA, with less development potential for housing and population than the Proposed Plan. The proposed changes under the Reduced Alternative reflect public input on the Proposed Plan. In general, this Alternative consists of similarly-located subareas around transit stations and corridors, but this Alternative reduces development potential in selected subareas. This Alternative would reduce the allowable base floor area ratio (FAR) in selected Regional Center subareas and the allowable base FAR along selected corridors, and also could reduce the proposed density of selected High Medium subareas.

More specifically, increases in development potential primarily near the Metro Hollywood/Vine Station; subareas with High-Medium Residential land use designation; and selected corridors with mixed-use incentives would be reduced under this Alternative. The Proposed Plan increases the allowable base FAR to 4.5:1 in the Regional Center subareas surrounding the Hollywood/Vine Station. The Reduced Alternative would lower the allowable base FAR by approximately 10 percent. These subareas are generally located east of Wilcox Avenue and/or Cahuenga Boulevard, south of Yucca Street, west of Gower Street, and north of De Longpre Avenue. The Reduced Alternative would maintain the existing density of one dwelling unit per 600 square feet of lot area and/or apply this reduced density to selected High Medium subareas. The Proposed Plan incentivizes mixed-use development along selected commercial corridors near transit, which includes bus service, by increasing the allowable FAR for projects that include both housing and commercial or are hotels. The Reduced Alternative would decrease the amount of mixed-use FAR incentive proposed in the following corridors: La Brea Avenue, Western Avenue, and Santa Monica Boulevard.

The Reduced Alternative assumes that the reasonably expected development of the CPA would be reduced compared to the Proposed Plan, but would still meet SCAG's 2040 population, housing and employment projections for the CPA. As shown in **Table 5-1** above, the reasonably expected development under the Reduced Alternative would be approximately 117,000 to 128,000 housing units, 235,000 to 256,000 residents, and 124,000 to 127,000 jobs. This Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer persons and a similar number of jobs compared to the Proposed Plan.

Administrative changes, the CPIO, and most Active Changes that would occur as part of the Proposed Plan would also occur under the Reduced Alternative. The reduction of FAR in selected Regional Center and corridor subareas, however, would cause the potential supply of new housing and non-residential uses to diminish because the incentive for development would be reduced.

This Alternative was included because it would reduce some identified significant impacts in some parts of the Hollywood CPA. It would reduce impacts (although likely not below levels of significance) related to air quality and noise. This Alternative was also included to meet the request of community groups. This Alternative would meet the underlying purpose and the primary and secondary project objectives in part, however, to a lesser degree than the Proposed Plan.

ALTERNATIVE 3: TARGETED CORRIDORS ALTERNATIVE

The Targeted Corridors Alternative would generally concentrate development along targeted corridors in the Hollywood CPA that could accommodate new housing, population and jobs. The amount of growth anticipated to occur under the Proposed Plan would occur under the Targeted Corridors Alternative, but it would be less concentrated in the Regional Center and would be dispersed along targeted corridors throughout the CPA. Under the Targeted Corridors Alternative, the Hollywood CPA would meet the same population, housing and employment projections anticipated in the Proposed Plan. This would be achieved through an increase in the maximum permitted FAR along corridors. Heights could range between four to

eight stories and with a maximum FAR of 3:1 along targeted segments of the major commercial corridors mentioned below.

The Targeted Corridors Alternative would concentrate growth along designated corridors, including La Brea Avenue, Vine Street, Western Avenue, Vermont Avenue, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, and Melrose Avenue. Proposed changes would be focused primarily on corridors with commercial land use designations such as Community Commercial, rather than being focused within the Regional Center Commercial in central Hollywood. The identified commercial corridor subareas in the Proposed Plan would be supplemented with additional corridors and corridor segments where development potential could be intensified to meet the reasonably expected housing, population, and employment.

Areas selected for increased development potential were based on the following criteria: 1) major corridors with a commercial land use designation; 2) existing Rapid or local bus service; 3) distribution of changes geographically throughout the Hollywood CPA; and 4) utilizing the development potential of larger lots and commercial intersections in areas where there is greater opportunity for development. This approach is in contrast to both the Proposed Plan, which focuses growth in the Regional Center and selected commercial corridors, and the High TOD Alternative, which focuses intensified growth within a half mile of five Metro Red Line stations.

This Alternative would not reduce the significant impacts and since it would disperse future development along selected commercial corridors instead of focusing growth in the Regional Center, it could slightly increase total daily VMT and congestion during peak travel periods. This Alternative was included to inform decision makers and foster public participation because it would result in fewer high-rises in the Regional Center, which the City is informed to be of interest to some decision-makers and members of the community. This alternative could lower building heights in the Regional Center, but could result in more mid-rise (four to eight stories) and potentially tall buildings along the targeted corridors.

ALTERNATIVE 4: HIGH TOD ALTERNATIVE

The High TOD Alternative for the Hollywood CPA would increase opportunities for TOD development around existing major rail infrastructure. This Alternative would concentrate the Proposed Plan's reasonably expected housing, population, and employment at the five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. Under the High TOD Alternative, the Hollywood CPA would meet the same population, housing and employment projections anticipated in the Proposed Plan.

The development potential near the Hollywood/Highland and Hollywood/Vine Stations would be further intensified by including some additional change areas within a half-mile radius of the stations, such as parcels along Hollywood Boulevard, and increasing the base FAR of selected subareas near these two stations. Additional selected areas within the half-mile radius would expand the existing Regional Center land use designation boundary to cover the western side of La Brea Avenue and designated multi-family residential areas along and near Yucca Street and Franklin Avenue. Adding more multi-family residential areas to the Regional Center would allow for additional housing and employment opportunities through increases in residential density and commercial intensity. As a result of increased base FARs to possibly 4.5:1, high-rise buildings in the 20-story range could become more common around the Los Angeles County Metropolitan Transportation Authority (Metro) Hollywood/Highland and Hollywood/Vine Stations. Regional Centers, as described in the Framework Element, contain a mix of mid- to high-rise buildings that are generally characterized in height by six- to 20-stories or higher.

The High TOD Alternative would extend the Regional Center land use designation east of the US-101 to selected areas near the Metro Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica Stations. These three stations and their vicinity areas currently have specific development regulations such as FAR and height limits under the existing Vermont/Western Transit Oriented Specific Plan (SNAP). This

Alternative would require amending the SNAP to allow for additional development by increasing FARs and removing height restrictions. FAR caps could increase from 3:1 today to possibly up to 6:1. Existing SNAP restrictions for maximum height, generally 75 feet for mixed-use projects or 100 feet for hospital uses without discretionary approval, would be removed to allow high-rise buildings in the expanded Regional Center. The hospital core area in East Hollywood near Vermont Avenue and Sunset Boulevard, which has a Community Center land use designation, would be intensified to Regional Center as well. This Alternative was included because it concentrates housing, population, and employment in transit nodes (i.e., around heavy rail infrastructure), and less along the corridors and would result in less severe significant impacts to violations of air quality standards and would be more consistent with SCAG's sustainable communities strategy. This alternative would be expected to have the lowest daily VMT and the lowest number of daily trips among the alternatives and the Proposed Project.

ALTERNATIVE 5: SCAG FORECAST ALTERNATIVE

This alternative is growth under the SCAG 2040 forecast in the CPA under the 2016-2040 RTP/SCS. The projections are similar to the reasonably expected development at the lower range of the No Project Alternative (Alternative 1). This alternative is therefore substantially the same as Alternative 1. The difference between the No Project Alternative and Alternative 5 is that projected growth under Alternative 5 does not include reasonably expected development from use of the TOC Guidelines because TOC was not adopted before SCAG made its 2040 forecasts. Therefore, Alternative 5 does not include the high range of reasonably expected growth that Alternative 1 includes. For this reason, Alternative 5 would not be as reasonably foreseeable as Alternative 1 if the Proposed Plan were not adopted. Additionally, Alternative 5 is different from Alternative 1 in that the forecasted growth by SCAG is more spread out in the CPA and less development is expected to occur in the regional center and around transit infrastructure systems than in Alternative 1.

5.6 EVALUATION OF PROJECT OBJECTIVES

An EIR must evaluate the comparative merits of a reasonable range of alternatives to the project that could feasibly attain most of the basic objectives of the project while avoiding or lessening any adverse effects of the project. For purposes of this analysis, the five alternatives are evaluated to determine the extent to which they attain the basic objectives of the Proposed Plan. **Table 5-2** provides an evaluation of the project objectives under the five alternatives followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by each alternative.

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Although Alternative 1 would meet SCAG's 2040 population, housing and employment projections, it would not achieve most of the primary and secondary objectives. It would not direct growth and maximize development opportunities around existing transit systems, transit hubs, and corridors. Compared to the Proposed Plan, the No Project Alternative would result in 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer residents and 5,000 to 8,000 fewer jobs. Under the No Project Alternative, no changes to existing zoning and General Plan land use designations would occur, regardless of the known inconsistencies between existing land uses, zoning and/or General Plan land use designations. In addition, under the No Project Alternative, future development would not be subject to the Proposed Plan's design, neighborhood compatibility, and hillside protections. The CPIO District, which would have regulatory protections for historical resources as well as pedestrian-oriented design regulations, would not be established under the No Project Alternative. The Proposed Plan's transportation and mobility network improvements would also be not implemented under the No Project Alternative.

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TABLE 5-2: EVALUATION OF PROJECT OBJECTIVES

	Alternative 1: No Project Alternative	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative	Alternative 5: SCAG Alternative
PRIMARY OBJECTIVES					
Accommodate projected population, housing, and employment growth consistent with the growth strategies of the Framework Element, including: (1) Maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts, (2) Direct growth to transit hubs and corridors, (3) Plan for increases to the housing supply, (4) Encourage balanced jobs and housing growth with mixed-use development, (5) Accommodate commercial uses for future employment opportunities, and (6) Focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space.	Partially Consistent	Partially Consistent	Partially Consistent	Partially Consistent	Partially Consistent
Direct growth away from low-density neighborhoods; preserve single-family and low-density residential neighborhoods.	Partially Consistent	Consistent	Partially Consistent	Partially Consistent	Partially Consistent
Provide a range of employment opportunities; promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.	Not Consistent	Consistent	Consistent	Consistent	Not Consistent
Protect historical and cultural resources.	Partially Consistent	Consistent	Partially Consistent	Partially Consistent	Partially Consistent
SECONDARY OBJECTIVES					
Encourage and promote a variety of mobility options; make streets walkable.	Not Consistent	Partially Consistent	Consistent	Consistent	Not consistent
Improve the function and design of neighborhoods throughout the Project Area by preserving and strengthening the appearance of the overall Project Area to promote pedestrian-friendly environments, nurture neighborhood character, improve economic vitality, create identity, and integrate a combination of land uses to create positive visual experiences.	Not Consistent	Consistent	Partially Consistent	Consistent	Not Consistent
Improve open space, parks and public spaces.	Not Consistent	Consistent	Consistent	Consistent	Not Consistent
Provide adequate public services and infrastructure.	Not Consistent	Partially Consistent	Consistent	Consistent	Not Consistent
Encourage sustainable land use.	Not Consistent	Consistent	Partially Consistent	Partially Consistent	Not Consistent
Maintain Land Use and Zoning Consistency.	Not Consistent	Consistent	Consistent	Consistent	Not Consistent

SOURCE: TAHA, 2018.

ALTERNATIVE 2: REDUCED TOD AND CORRIDORS ALTERNATIVE (REDUCED ALTERNATIVE)

Alternative 2 would meet the underlying purpose of meeting SCAG's 2040 population, housing and employment projections and all of the primary and secondary project objectives, although to a lesser degree than the Proposed Plan because it would not maximize development opportunities around existing transit systems, which could result in more development outside of high quality transit areas. The Reduced Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer residents and a similar number of jobs compared to the Proposed Plan. Similar to the Proposed Plan, the Reduced Alternative directs growth to transit stations and corridors, but to a lesser degree. Compared to the Proposed Plan, Alternative 2 would reduce the allowable FAR in selected Regional Center subareas and along selected corridors. The proposed density of selected High Medium subareas could be reduced as well. Similar to the Proposed Plan, protections to historical resources and pedestrian-oriented design regulations through the CPIO District would be established, and future development would be subject to applicable design and neighborhood compatibility protections, hillside protections, and new transportation and mobility network improvements.

ALTERNATIVE 3: TARGETED CORRIDORS ALTERNATIVE

Alternative 3 would achieve the purpose of the project by meeting SCAG's 2040 population, housing and employment projections and would partially achieve the underlying purpose and all of the project objectives although to a lesser degree than the Proposed Plan because it does not focus growth into Framework identified centers. Through an increase in the maximum permitted FAR along corridors, the Targeted Corridors Alternative would meet the same population, housing and employment projections anticipated in the Proposed Plan. However, compared to the Proposed Plan, the reasonably expected development would be less concentrated in the Regional Center and would be dispersed more along selected corridors in the Hollywood CPA. Alternative 2 would partially meet some objectives, but not to the same extent as the Proposed Project. For example, the Targeted Corridors Alternative would primarily concentrate growth along corridors with less intense commercial land use designations rather than the Regional Center area and around Metro rail transit stations. This would be inconsistent with the growth strategies of the General Plan Framework Element, which encourage a jobs/housing balance near transit centers. Although, this Alternative places development potential along corridors served by local bus lines, the many benefits of establishing TOD plans around Metro rail transit stations would not be achieved, including increasing pedestrian-friendly environments and access to transit. Also, there would likely be increased vehicle miles traveled (VMT) with this Alternative, as future growth would not be concentrated at existing transit stations where residents, employees and visitors can take advantage of existing transit opportunities. Similar to the Proposed Plan, protections to historical resources and regulations for pedestrian-oriented design through the CPIO District would be established, and future development would be subject to applicable design and neighborhood compatibility protections, hillside protections, and new transportation and mobility network improvements, although to a lesser degree than the Proposed Plan.

ALTERNATIVE 4: HIGH TOD ALTERNATIVE

Alternative 4 would achieve the purpose of the project by meeting SCAG's 2040 population, housing and employment projections and would partially achieve the underlying purpose and project objectives although to a lesser degree than the Proposed Plan because it would partially focus growth outside of Framework identified centers in East Hollywood and would maintain the low scale development along commercial corridors. The High TOD Alternative would meet the same population, housing and employment projections anticipated in the Proposed Plan, and it would be better aligned with SB743's goal of more urban infill development near transit by concentrating growth at all five Metro Red Line Station areas in the Hollywood CPA, including East Hollywood. As a result of increased base FARs, buildings 20 stories or higher could become more common around the Hollywood/Highland and Hollywood/Vine stations. But

Alternative 4 would require amending the Vermont/Western Transit Oriented District Specific Plan (SNAP) to increase allowable FAR and remove a height limit around Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica stations, which generally limit the FAR to 3:1 and height to 75 feet. Similar protections to historical resources and pedestrian-oriented design regulations through the CPIO District would be established, and future development would be subject to the Proposed Plan's applicable design and neighborhood compatibility protections, hillside protections, and new transportation and mobility network improvements, although to a lesser degree than the Proposed Plan because Alternative 4 would require amending the SNAP Specific Plan to focus growth outside of Framework identified centers.

ALTERNATIVE 5: SCAG FORECAST ALTERNATIVE

This alternative would be largely considered to be similar to the No Project Alternative (Alternative 1), in terms of meeting primary and secondary objectives and foreseeable impacts, except that because the SCAG Forecast Alternative generally assumes that foreseeable development would be more spread out in the CPA and not directed as much to the Regional Center or around transit infrastructure, it would be less consistent with the growth strategies of the City as provided in the Framework Element than the No Project Alternative

5.7 COMPARISON OF ALTERNATIVES

Per the CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the Proposed Plan.

As to Alternative 5 (SCAG 2040 Forecast Alternative), as discussed above, for comparison purposes, the No Project Alternative (Alternative 1) may serve to identify the difference expected from the Proposed Project and the SCAG Forecast Alternative.

Table 5-3 provides a summary comparison of the environmental impacts of the five alternatives as compared to the Proposed Plan. Where the net impact of the alternative would be less adverse or more beneficial than the impact of the Proposed Plan, the comparative impact is said to be "less." Where the net impact of the alternative would be more adverse or less beneficial than the Proposed Plan, the comparative impact is said to be "greater." Where the net impacts of the alternative and Proposed Plan would be roughly equivalent, the comparative impact is said to be "similar."

AESTHETICS

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced impacts related to scenic vistas and light compared to the Proposed Plan because of the reduced amount of development expected. There are several publicly accessible locations in the Hollywood CPA that provide scenic vistas, of which there are two publicly available scenic vista points that provide panoramic views of the Project Area. Alternative 1 would be expected to have less development than the Proposed Plan, so in general, there could be fewer taller buildings in the Regional Center that could lead to a lower skyline and lower building heights along commercial corridors compared to the Proposed Plan. There are no state scenic highways within the Hollywood CPA; however, there are City-designated scenic highways, as well as historical resources within the Project Area. The Santa Monica Mountains portion of the Hollywood CPA also contains distinct geologic and topographic features. Similar to the Proposed Plan, the No Project Alternative does not involve any components that would change the scenic features associated with the City-designated scenic highways or the undeveloped natural open space areas within the Project Area.

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES

Impact	Proposed Plan	Alternative 1: No Project Alternative	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative	Alternative 5: SCAG Alternative
AESTHETICS						
Impact 4.1-1: Scenic Vista	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.1-2: Scenic Resources within State Scenic Highway	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.1-3: Visual Character	LTS	Greater, LTS	Less, LTS	Greater, LTS	Greater, LTS	Greater, LTS
Impact 4.1-4: Light and Glare	LTS -- lighting LTS with mitigation -- glare	Less, LTS – lighting Greater, SU- glare	Less, LTS – lighting Less, LTS with mitigation – glare	Greater, LTS – lighting Greater, LTS with mitigation - glare	Greater, LTS – lighting Greater, LTS with mitigation - glare	Less, LTS – lighting Greater, SU- glare
AGRICULTURE AND FORESTRY RESOURCES						
Impact 4.2-1: Important Farmland	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.2-2: Zoning and Williamson Act	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.2-3: Timberland/Forest Land Conflict	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.2-4 and **4.2-5**: Loss of Forest Land/Conversion of Forest Land to Non-Forest Use	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
AIR QUALITY						
Impact 4.3-1: Air Quality Plan	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.3-2: Violate Air Quality Standard	SU for construction for NO_X, $PM_{2.5}$, and PM_{10} and operations for VOC	*Construction:* Less, SU	*Construction:* Less, SU	*Construction:* Similar, SU	*Construction:* Similar, SU	*Construction: Less, SU*
		Operation: Less, SU	*Operation:* Less, SU	*Operation:* Greater, SU	*Operation:* Less, SU	*Operation:* Less, SU
Impact 4.3-3: Cumulative Increase	SU	Less, SU	Less, SU	Similar, SU	Similar, SU	Less, SU
Impact 4.3-4: Sensitive Receptors	*Construction*: SU	*Construction:* Less, SU	*Construction:* Less, SU	Construction: Similar, SU	Construction: Similar, SU	*Construction:* Less, SU
	Operation: LTS	*Operation:* Similar, LTS	*Operation:* Similar, LTS	*Operation:* Similar, LTS	*Operation:* Similar, LTS	*Operation:* Similar, LTS
Impact 4.3-5: Odors	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
BIOLOGICAL RESOURCES						
Impact 4.4-1: Special Status Species Habitat	SU	Greater, SU	Similar, SU	Similar, SU	Similar, SU	Greater, SU
Impact 4.4-2: Riparian Habitat	SU	Greater, SU	Similar, SU	Similar, SU	Similar, SU	Greater, SU
Impact 4.4-3: Wetlands	SU	Greater, SU	Similar, SU	Similar, SU	Similar, SU	Greater, SU

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES						
Impact	**Proposed Plan**	**Alternative 1: No Project Alternative**	**Alternative 2: Reduced Alternative**	**Alternative 3: Targeted Corridors Alternative**	**Alternative 4: High TOD Alternative**	**Alternative 5: SCAG Alternative**
Impact 4.4-4: Migratory Wildlife, Biological Resources Plan	SU	Greater, SU	Similar, SU	Similar, SU	Similar, SU	Greater, SU
Impact 4.4-5: Local Policies or Ordinances	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.4-6: Habitat Conservation Plan	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
CULTURAL RESOURCES						
Impact 4.5-1: Historical Resources	SU	Greater, SU	Less, SU	Greater, SU	Greater, SU	Greater, SU
Impact 4.5-2: Archaeological Resources	LTS with mitigation	Greater, SU	Less, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, SU
Impact 4.5-3: Paleontological Resources	LTS with mitigation	Greater, SU	Less, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, SU
Impact 4.5-4: Human Remains	LTS	Similar, LTS	Less, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.5-5: Tribal Cultural Resource	LTS with mitigation	Greater, LTS	Less, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, LTS
GEOLOGY AND SOILS						
Impact 4.6-1: Earthquake Fault	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-2: Seismicity	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-3: Seismic-Related Ground Failure	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-4: Soil Erosion	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.6-5: Geologic Hazards / Unstable Soils	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-6: Expansive Soil	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-7: Septic Tanks	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
GREENHOUSE GAS EMISSIONS						
Impact 4.7-1 and 4.7-2: Greenhouse Gas Emissions and Applicable Plans, Policies or Regulations	LTS	Greater, SU	Greater, LTS	Greater, LTS	Less, LTS	Greater, SU
HAZARDS AND HAZARDOUS MATERIALS						
Impact 4.8-1: Hazardous Materials Transport, Use, Disposal	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.8-2: Hazardous Materials Upset or Accident	LTS with mitigation	Greater, LTS	Similar, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, LTS
Impact 4.8-3: Hazards within 1/4 Mile of a School	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.8-4: Hazardous Materials Sites	LTS with mitigation	Greater, LTS	Similar, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, LTS

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES						
Impact	**Proposed Plan**	**Alternative 1: No Project Alternative**	**Alternative 2: Reduced Alternative**	**Alternative 3: Targeted Corridors Alternative**	**Alternative 4: High TOD Alternative**	**Alternative 5: SCAG Alternative**
Impact 4.8-5: Public Airport or Airport Plan	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.8-6: Private Airstrip	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.8-7: Emergency Response Plans	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.8-8: Wildland Fire	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
HYDROLOGY AND WATER QUALITY						
Impact 4.9-1: Water Quality Standards/Discharge Requirements	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-2: Groundwater	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-3: Drainage - Erosion or Siltation	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-4: Drainage - Flooding	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-5: Stormwater Drainage Systems	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-6: Water Quality	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-7: Housing in Flood Hazard Area	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-8: Structures Impeding Flood Flows	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-9: Risk from Flooding	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.9-10: Risk from Inundation	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.9-11: Flooding During 100-year Event	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
LAND USE AND PLANNING						
Impact 4.10-1: Physically Divide a Community	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.10-2: Land Use Plans and Policy Consistency	LTS	Greater, SU	Greater, LTS	Greater, LTS	Greater, LTS	Greater, SU
Impact 4.10-3: Habitat Conservation Plans	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
MINERAL RESOURCES						
Impact 4.11-1: Statewide/Regional Mineral Resources	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.11-2: Local Mineral Resources (i.e. MRZ-2)	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES

Impact	Proposed Plan	Alternative 1: No Project Alternative	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative	Alternative 5: SCAG Alternative
NOISE						
Impact 4.12-1: Noise Levels	NI	Less, NI	Less, NI	Similar, NI	Similar, NI	Less, NI
Impact 4.12-2: Groundborne Vibration/Noise	*Construction*: SU	Less, SU	Less, SU	Similar, SU	Similar, SU	Less, SU
	Operations LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.12-3: Permanent Increase - Noise	*Stationary Sources*: SU	Less, SU	Less, SU	Similar, SU	Similar, SU	Less, SU
	Mobile Sources: LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.12-4: Temporary Increase - Noise	SU	Less, SU	Less, SU	Similar, SU	Similar, SU	Less, SU
Impact 4.12-5: Noise Exposure – Airport Plan	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.12-6: Noise Exposure - Private Airstrip	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
POPULATION, HOUSING, AND EMPLOYMENT						
Impact 4.13-1: Induce Substantial Growth	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.13-2: Displacement of Housing	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.13-3: Displacement of People	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
PUBLIC SERVICES						
Impact 4.14-1: Fire Protection & Emergency Services	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.14-2: Police Protection Facilities	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.14-3: Public Schools	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.14-4: Existing Parks and Recreational Facilities a. increased use leading to degradation of existing facilities b. construction impacts from new facilities	Less, a. SU, b. LTS	Less, a. SU, b. LTS	Less, a. SU, b. LTS	Similar, a. SU, b. LTS	Similar, a. SU, b. LTS	Less, a. SU, b. LTS
Impact 4.14-5: Libraries	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES

Impact	Proposed Plan	Alternative 1: No Project Alternative	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative	Alternative 5: SCAG Alternative
TRAFFIC AND TRANSPORTATION						
Impact 4.15-1: Other Transportation Plans or Policies	LTS	Greater, LTS	Similar, LTS	Greater, LTS	Similar, LTS	Greater, LTS
Impact 4.15-2: CEQA Guidelines Section 15064.3(b)	LTS	Less, LTS	Less, LTS	Greater, LTS	Greater, LTS	Less, LTS
Impact 4.15-3: Design Feature Hazard	LTS	Less, LTS	Less, LTS	Greater, LTS	Similar, LTS	Less, LTS
Impact 4.15-4: Emergency Access	LTS	Less, LTS	Less, LTS	Greater, LTS	Similar, LTS	Less, LTS
UTILITIES AND SERVICE SYSTEMS						
Impact 4.16-1: Water Treatment Facilities	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-2: Water Supply	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-3, 4.16-4 and **4-16-6:** Wastewater Treatment Facilities	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-5: Stormwater Drainage Facilities	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-7: Solid Waste Disposal	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-8: Solid Waste Regulations	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.16-9: Energy	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS

NI=No Impact; LTS=Less than Significant; SU=Significant and Unavoidable; PS=Potentially Significant
SOURCE: TAHA, 2018.

However, future development within the Hollywood CPA under the No Project Alternative has the potential to occur on, or adjacent to, historical resources similar to the Proposed Plan. The Proposed Plan includes policies and programs to assist in protecting historical resources, and has applicable design and neighborhood compatibility protections contributing to visual character but these would not exist under the No Project Alternative. The No Project Alternative also would not be subject to the CPIO District, which would have regulatory protections for historical resources, and would include regulations for pedestrian-oriented design. The No Project Alternative also would not include Mitigation Measure **AE1**, which would reduce glare impacts from new construction

Therefore, even though less overall development could be accommodated, and future development would be lower in scale compared to the Proposed Plan, since the applicable design and neighborhood compatibility protections and the CPIO District would not be established, and it would not include Mitigation Measure **AE1**, the No Project Alternative would result in greater impacts related to visual character and glare compared to the Proposed Plan.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced impacts related to aesthetics compared to the Proposed Plan. Compared to the Proposed Plan, the Reduced Alternative directs growth to similarly-located subareas around transit stations and corridors but provides lesser development potential in selected subareas. This Alternative would reduce the allowable base FAR in selected Regional Center subareas. These subareas are generally located east of Wilcox Avenue and/or Cahuenga Boulevard, south of Yucca Street, west of Gower Street, and north of De Longpre Avenue. In addition, compared to the Proposed Plan, the Reduced Alternative would decrease the amount of mixed-use FAR incentive proposed in the La Brea Avenue, Western Avenue, and Santa Monica Boulevard corridors and the density in selected High Medium subareas. There are several publicly accessible locations in the Hollywood CPA that provide scenic vistas, of which there are two publicly available scenic vista points that provide panoramic views of the Project Area. Compared to the Proposed Plan, the Reduced Alternative would result in less anticipated development in the Regional Center and in selected corridors, so there would be lower building heights in these areas. Similar to the Proposed Project, future development under the Reduced Alternative has the potential to create new sources of light and glare, but the impact would be less because of the reduced amount of development. If Alternative 2 is adopted with Mitigation Measure **AE1** imposed, the impact will be less than significant, but if it is not imposed, the impact will be significant and unavoidable. Similar to the Proposed Plan, the Reduced Alternative does not involve any components that would change the scenic features associated with the City-designated scenic highways or the undeveloped natural open space areas within the Project Area. However, future development within the Hollywood CPA under the Reduced Alternative has the potential to occur on, or adjacent to, eligible and designated historical resources similar to the Proposed Plan. Similar to the Proposed Plan, the CPIO District, which will have regulatory protections for historical resources and pedestrian-oriented design regulations and most Active Change Areas that would occur as part of the Proposed Plan would also occur under the Reduced Alternative. Because the maximum allowable FARs (building intensity) would be less than the Proposed Plan in certain change areas, the Reduced Alternative would result in fewer impacts related to visual character compared to the Proposed Plan.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar impacts related to scenic vistas and scenic resources compared to the Proposed Plan. The Targeted Corridors Alternative would generally concentrate development along targeted corridors in the Hollywood CPA that could accommodate new housing, population and jobs. Compared to the Proposed Plan, the same amount of growth that would occur under the Proposed Plan would occur under the Targeted Corridors Alternative; however, future growth would be less concentrated in the Regional Center and would be dispersed more throughout the Hollywood CPA along the selected corridors. There are several publicly accessible locations in the Hollywood CPA that provide scenic vistas, of which there are two publicly available scenic vista points that provide panoramic views of the Project Area. Compared to the Proposed Plan, the Targeted

Corridors Alternative would result in more dispersed development along commercial corridors, so there would be lower building heights in the Regional Center and taller buildings along the corridors. Similar to the Proposed Plan, the Targeted Corridors Alternative does not involve any components that would change the scenic features associated with the City-designated scenic highways or the undeveloped natural open space areas within the Project Area. Future development within the Hollywood CPA under the Targeted Corridors Alternative has the potential to occur on, or adjacent to, eligible and designated historical resources similar to the Proposed Plan. Similar to the Proposed Plan, future development under Alternative 3 would be subject to the applicable new development regulations and design standards, as well as the CPIO District's regulatory protections for historical resources and regulations for pedestrian-oriented design. However, the Targeted Corridors Alternative could result in the potential for more aesthetic impacts to lower density residential neighborhoods adjacent to certain corridors (i.e., La Brea Avenue, Vine Street, Western Avenue, Vermont Avenue, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, and Melrose Avenue) since there could be more mid-rise buildings between four to eight stories and potentially tall buildings, which could also create additional sources of light and concentration of reflective surfaces. Therefore, Alternative 3 could result in greater impacts related to visual character and light and glare compared to the Proposed Plan. If the Targeted Corridors Alternative is adopted with Mitigation Measure **AE1** imposed, the impact for glare will be less than significant, but if it is not imposed, the impact will be significant and unavoidable.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar impacts related to scenic vistas and scenic resources as compared to the Proposed Plan. The High TOD Alternative would increase opportunities for TOD development around heavy rail infrastructure. Specifically, Alternative 4 would concentrate reasonably foreseeable housing, population, and employment development at the five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. The High TOD Alternative would also expand the Regional Center land use designation east of the US-101 to selected areas near the Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica Stations. There are several publicly accessible locations in the Hollywood CPA that provide scenic vistas, of which there are two publicly available scenic vista points that provide panoramic views of the Project Area. Compared to the Proposed Plan, the High TOD Alternative would result in taller buildings near the three Red Line stations in East Hollywood. Similar to the Proposed Plan, the High TOD Alternative would not include any components that would change the scenic features associated with the City-designated scenic highways or the undeveloped natural open space areas within the Project Area. However, future development within the Hollywood CPA under the High TOD Alternative has the potential to occur on, or adjacent to, eligible and designated historical resources similar to the Proposed Plan. Similar to the Proposed Plan, future development under Alternative 4 would also be subject to new applicable design and neighborhood compatibility protections, as well as the CPIO District's regulations to protect historical resources and pedestrian-oriented design. Compared to the Proposed Plan, the High TOD Alternative could result in the potential for more aesthetic impacts to lower density neighborhoods adjacent to Metro Red Line station areas in East Hollywood. The potential height and FAR of new construction in Change Areas would be greater than under the Proposed Plan. As a result of increasing heights in concentrated areas, which could also create additional concentration of light sources and reflective surfaces, Alternative 4 could result in greater impacts related to visual character and light and glare compared to the Proposed Plan. If the High TOD Alternative is adopted with Mitigation Measure **AE1** imposed, the impact of glare will be less than significant, but if it is not imposed, the impact will be significant and unavoidable.

AGRICULTURE AND FORESTRY RESOURCES

Alternatives 1 through 4. Alternatives 1 through 4 would result in similar impacts related to agriculture and forestry resources compared to the Proposed Plan. The Hollywood CPA is an urbanized area and does not contain prime or important farmlands, timberland, or forest land. Hollywood Forever Cemetery, Forest Lawn – Hollywood Hills, Mt. Sinai Memorial Park, and a portion of the Los Angeles River along the northern boundaries of the Project Area between Barham Boulevard and Bob Hope Drive are the only areas

within the Project Area that are zoned for agricultural purposes. However, these areas are not used for agricultural purposes and are not under a Williamson Act contract. In regards to forestry resources, the hillsides in the northern portion of the Project Area contain Southern Cottonwood Willow Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern Coast Live Oak Riparian Forest, and California Walnut Woodland. These areas are zoned for open space and are not defined as forest land, timberland or zoned Timberland Production. Similar to the Proposed Plan, Alternatives 1 through 4 would not affect the existing use or zoning of these areas. Therefore, similar to the Proposed Plan, no impacts related to agriculture and forestry resources would occur under Alternatives 1 through 4.

AIR QUALITY

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced impacts (as a result of less anticipated new development) related to air quality compared to the Proposed Plan. During the construction of future development under the No Project Alternative, regional and localized emissions could still exceed the South Coast Air Management District (SCAQMD) daily significance thresholds, resulting in a significant and unavoidable impact, similar to the Proposed Plan. The No Project Alternative would not be subject to Mitigation Measure **AQ1** related to construction equipment and practices, therefore daily emissions at individual sites could be greater than under the Proposed Plan. Because less new development could be accommodated, overall construction emissions would be less under the No Project Alternative. Compared to the Proposed Plan, the No Project Alternative would result in approximately 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer residents and 5,000 to 8,000 fewer jobs. In the future, with buildout under the Proposed Plan, Alternative 1 would result in lower daily vehicle trips and daily VMT than the Proposed Plan. As a result of less development under the Proposed Plan, operational emissions generated by mobile sources and area sources would be less than the Proposed Plan. When compared to existing conditions, operational volatile organic compound (VOC) emissions would increase as a result of architectural coating emissions and use of consumer products (e.g., cleaning supplies, cosmetics, and toiletries) associated with new residential land uses. Similar to the Proposed Plan, the increase in VOC emissions would be greater than the SCAQMD daily significance threshold; as a result of less new development VOC emissions would be less than under the Proposed Plan but still significant. Therefore, similar to the Proposed Plan, impacts related to construction-related regional and localized emissions and operational regional emissions under the No Project Alternative would be significant and unavoidable, and all other impacts related to air quality would be less than significant.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced (as a result of less anticipated development) impacts related to air quality as compared to the Proposed Plan. During the construction of future development under the Reduced Alternative, regional and localized emissions would exceed the SCAQMD daily significance thresholds, resulting in a significant and unavoidable impact, similar to the Proposed Plan. With the adoption of Alternative 2 subject to Mitigation Measure **AQ1** related to construction equipment and practices, emissions would be reduced but could still exceed the established thresholds and would remain significant and unavoidable. Because less new development could be accommodated, overall construction emissions would be less under the Reduced Alternative compared to the Proposed Plan. The Reduced Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer residents and a similar number of jobs compared to the Proposed Plan. In addition, daily vehicle trips and VMT would be lower in Alternative 2 compared to the Proposed Plan. As a result of less new development, operational emissions generated by mobile sources and area sources would be less than the Proposed Plan. When compared to existing conditions, operational VOC emissions would increase as a result of architectural coating emissions and use of consumer products (e.g., cleaning supplies, cosmetics, and toiletries) associated with new residential land uses. Similar to the Proposed Plan, the increase in VOC emissions would be greater than the SCAQMD daily significance threshold; as a result of less new development VOC emissions would be less than under the Proposed Plan but still significant. Therefore, similar to the Proposed Plan, impacts related to construction-related regional and localized emissions and operational regional emissions would be less

under the Reduced Alternative but would be significant and unavoidable, and all other impacts related to air quality would be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar impacts related to air quality as compared to the Proposed Plan. During the construction of future development under the Targeted Corridors Alternative, regional and localized emissions would exceed the SCAQMD daily significance thresholds, resulting in a significant and unavoidable impact, similar to the Proposed Plan. With the adoption of Alternative 3 subject to Mitigation Measure **AQ1** related to construction equipment and practices, emissions would be reduced but could still exceed the established thresholds and would be similarly significant and unavoidable. Because the same amount of development could be accommodated, overall construction emissions would be similar under the Targeted Corridors Alternative as compared to under the Proposed Plan. However, Alternative 3 results in a greater total mobile source exposure due to increased VMT. Operational emissions generated by mobile sources would be greater than the Proposed Plan. When compared to existing conditions, operational VOC emissions would increase as a result of architectural coating emissions and use of consumer products (e.g., cleaning supplies, cosmetics, and toiletries) associated with new residential land uses. Similar to the Proposed Plan, the increase in VOC emissions would be greater than the SCAQMD daily significance threshold. Therefore, similar to the Proposed Plan, impacts related to construction-related regional and localized emissions and operational regional emissions under the Targeted Corridors Alternative would be significant and unavoidable, and all other impacts related to air quality would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar impacts related to air quality as compared to the Proposed Plan. During the construction of future development under the High TOD Alternative, regional and localized emissions would exceed the SCAQMD daily significance thresholds, resulting in a significant and unavoidable impact, similar to the Proposed Plan. With the adoption of Alternative 4 subject to Mitigation Measure **AQ1** related to construction equipment and practices, emissions would be reduced but could still exceed the established thresholds and would be similarly significant and unavoidable. Because the same amount of development could be accommodated, overall construction emissions would be similar under the High TOD Alternative as compared to the Proposed Plan. However, Alternative 4 results in a slightly lower total mobile source exposure due to decreased VMT. Operational emissions generated by mobile sources would be less than the Proposed Plan. When compared to existing conditions, operational VOC emissions would increase as a result of architectural coating emissions and use of consumer products (e.g., cleaning supplies, cosmetics, and toiletries) associated with new residential land uses. Similar to the Proposed Plan, the increase in VOC emissions would be greater than the SCAQMD daily significance threshold. Therefore, similar to the Proposed Plan, impacts related to construction-related regional and localized emissions and operational regional emissions under the High TOD Alternative would be significant and unavoidable, and all other impacts related to air quality would be less than significant.

BIOLOGICAL RESOURCES

Alternative 1: No Project Alternative. Alternative 1 would result in greater impacts related to biological resources as compared to the Proposed Plan. There are no Natural Community Conservation Plans (NCCPs) or other local, regional, or state-adopted Habitat Conservation Plans (HCPs) within or near the Project Area, so similar to the Proposed Plan the impact on local policies or ordinances would be less than significant, and there would be no impact on a habitat conservation plan. However, most of the Santa Monica Mountains east of US-101, including Griffith Park, are part of a Significant Ecological Area (SEA). Other areas within the Project Area that have the potential to support biological resources include the portion of the Los Angeles River that flows within the Project Area and various open space areas within the Project Area. Although areas that have the potential to support biological resources within the Project Area would remain unchanged under Alternative 1, it is reasonably foreseeable that properties in these areas could potentially be developed. Compared to the Proposed Plan, No Project Alternative would not include Mitigation

Measures **BR1** to **BR6**. Therefore, impacts related to biological resources under the No Project Alternative would be greater than the Proposed Plan, and would also be significant and avoidable.

Alternatives 2 through 4: Reduced Alternative, Targeted Corridor Alternative, and High TOD Alternative. Alternatives 2 through 4 would result in similar impacts related to biological resources as compared to the Proposed Plan. There are no Natural Community Conservation Plans (NCCPs) or other local, regional, or state-adopted Habitat Conservation Plans (HCPs) within or near the Project Area, so similar to the Proposed Plan the impact on local policies or ordinances would be less than significant, and there would be no impact on a habitat conservation plan. However, most of the Santa Monica Mountains east of US-101, including Griffith Park, are part of a Significant Ecological Area (SEA). Other areas within the Project Area that have the potential to support biological resources include the portion of the Los Angeles River that flows within the Project Area and various open space areas within the Project Area. Under the Proposed Plan, there are two subareas located within the SEA where consistency corrections are proposed to ensure that these areas are protected. The remaining areas of the SEA and Santa Monica Mountains are in Non-Change Areas. Although areas that have the potential to support biological resources within the Project Area would remain unchanged under Alternatives 2 through 4, it is reasonably foreseeable that properties in these areas could potentially be developed. If one of Alternatives 2 through 4 is adopted subject to Mitigation Measures **BR1** to **BR6,** it would reduce impacts to special status species, riparian habitat, wetlands, and biological resources, although not to a less-than-significant level. Therefore, similar to the Proposed Plan, impacts related to biological resources under Alternatives 2 through 4 would be significant and unavoidable.

CULTURAL RESOURCES

Alternative 1: No Project Alternative. Alternative 1 would result in greater impacts related to historical, archaeological resources, and paleontological resources compared to the Proposed Plan. Compared to the Proposed Plan, under the No Project Alternative the CPIO District, which has regulations to protect historical resources, would not be established, and future development would not be subject to the Proposed Plan's applicable design and neighborhood compatibility protections. Similar to the Proposed Plan, construction-related ground disturbing activities associated with future development under Alternative 1 could lead to the discovery of previously unknown archaeological or paleontological resources as well as tribal resources or human remains. Overall construction would be less under the No Project Alternative, which could lead to less potential to encounter these resources. However, the No Project Alternative would not include the mitigation measures included under the Proposed Plan to protect archaeological or paleontological resources, although likely project-specific environmental review would impose similar requirements on discretionary projects. Although it is a misdemeanor for anyone to remove anything of archeological or paleontological interest, it could potentially occur through negligence during grading and excavation absent monitoring and enforcement. Compliance with existing regulations, including California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code (PRC) Section 5097.98.[2] Therefore, similar to the Proposed Plan, impacts related to tribal resources and human remains under Alternatives 1 and 5 would be less than significant, while compared to the Proposed Plan, impacts related to archaeological and paleontological resources would be significant and unavoidable.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar but reduced impacts (as a result of less anticipated development) related to historical and tribal cultural resources compared to the Proposed Plan. Similar to the Proposed Plan, the Reduced Alternative focuses development at transit stations and corridors within the CPA, although with less

[2]Section 5097.98 outlines the Native American Heritage Commission notification process and the appropriate procedures if the County Coroner determines the human remains to be Native American.

development potential for housing and population. Similar to the Proposed Plan, the CPIO District, which has regulations to protect historical resources and regulations for pedestrian-oriented design, would be established, and future development would be subject to new design and neighborhood compatibility protections as applicable. However, as with the Proposed Plan, even with the CPIO, there is a risk of loss of historical resources with new development or redevelopment over a 20-year plan horizon, so the impact would be significant and unavoidable. Therefore, Alternative 2 would result in similar but reduced impacts related to historical resources compared to the Proposed Plan. Construction-related ground disturbing activities associated with future development under Alternative 2 could lead to the discovery of previously unknown archaeological or paleontological resources as well as tribal resources or human remains similar to the Proposed Plan. Overall construction would be less under Alternative 2, which could lead to less potential to encounter resources. The Reduced Alternative adopted with the same mitigation measures identified for the Proposed Plan to protect archaeological, paleontological and tribal resources would result in less than significant impacts to these resources, but without the mitigation measure the impact would be significant. Compliance with existing regulations, including California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98[3] would result in less than significant impacts to human remains. Since overall construction would be less under Alternative 2, there would also be less impacts to human remains compared to the Proposed Plan.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in incrementally greater impacts related to historical resources as compared to the Proposed Plan. Under the Targeted Corridors Alternative, growth would be less concentrated in the Regional Center and would be dispersed more throughout the Project Area along designated corridors instead of focused around the heavy rail stations compared to the Proposed Plan. The Targeted Corridors Alternative would concentrate growth along commercial corridors such as Santa Monica Boulevard and Melrose Avenue, which are outside of the CPIO boundaries. Since the CPIO regulations to protect historical resources would apply to less of the targeted growth areas than the Proposed Plan, it could result in incrementally greater impacts related to historical resources than the Proposed Plan. As discussed in Alternative 2, even if the CPIO was expanded to include the corridors, the impacts would be significant and unavoidable. Similar to the Proposed Plan, construction-related ground disturbing activities associated with future development under Alternative 3 could lead to the discovery of previously unknown archaeological or paleontological resources as well as tribal resources or human remains. The Targeted Corridors Alternative adopted with the same mitigation measures identified for the Proposed Plan to protect archaeological, paleontological or tribal resources would result in less than significant impacts to these resources, without the mitigation measure the impact would be significant. Compliance with existing regulations, including California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98[4] would result in less than significant impacts to human remains. Therefore, impacts to human remains would be similar to the Proposed Plan.

Alternative 4: High TOD Alternative. Alternative 4 would result in incrementally greater impacts related to historical resources as compared to the Proposed Plan. The High TOD Alternative would increase opportunities for TOD development around heavy rail infrastructure within the Project Area and would concentrate the anticipated new housing, population, and employment at the five Metro Red Line station areas in the CPA, including East Hollywood. The High TOD Alternative would also expand the Regional Center land use designation east of the US-101 to selected areas near the Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica Metro stations. Since these areas in East Hollywood are

[3]Section 5097.98 outlines the Native American Heritage Commission notification process and the appropriate procedures if the County Coroner determines the human remains to be Native American.

[4]*Ibid.*

outside of the CPIO boundaries, the CPIO District's protections for historical resources would apply to less of the targeted growth areas than the Proposed Plan. Therefore, Alternative 4 could result in incrementally greater impacts related to historical resources than the Proposed Plan. As discussed in Alternative 2, even if the CPIO was expanded to include the corridors, the impacts would be significant and unavoidable. Construction-related ground disturbing activities associated with future development under Alternative 4 could lead to the discovery of previously unknown archaeological or paleontological resources as well as human remains similar to the Proposed Plan. The High TOD Alternative adopted with the same mitigation measures identified for the Proposed Plan to protect archaeological, paleontological or tribal resources would result in less than significant impacts to these resources, without the mitigation measure the impact would be significant. Compliance with existing regulations, including California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98[5] would result in less than significant impacts to human remains. Therefore, impacts to human remains would be similar to the Proposed Plan.

GEOLOGY AND SOILS

Alternatives 1 through 4. Alternatives 1 through 4 would result in similar impacts related to geology and soils compared to the Proposed Plan. The Project Area, like all communities in the City of Los Angeles, is in a seismically active region, and is subject to risk of damage as a result of seismic ground shaking from earthquakes originating on one or more of the active faults in the region. Similar to the Proposed Plan, Alternatives 1 through 4 would not exacerbate existing geologic conditions, and compliance with existing California Building Code (CBC) and Los Angeles Building Code (LABC) regulations would minimize the effects of seismic and geologic hazards to the maximum extent feasible. Likewise, all future construction activities that involve earthwork and grading under Alternatives 1 through 4 would be required to comply with applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code (LAMC), which addresses grading, excavations, and fills, and the recommendations of a site-specific geotechnical report. Similar to the Proposed Plan, site-specific projects under Alternatives 1 through 4 would also be required to comply with the City's Low Impact Development Ordinance, which would help reduce soil erosion and the loss of topsoil. Therefore, similar to the Proposed Plan, impacts related to geology and soils under Alternatives 1 through 4 would be less than significant and/or have no impact.

GREENHOUSE GAS EMISSIONS

Alternative 1: No Project Alternative. Alternative 1 would result in greater impacts related to GHG and GHG reduction plans compared to the Proposed Plan. Compared to the Proposed Plan, the decreased development under the No Project Alternative would result in less stationary source emissions in the Project Area, but regionally, the decreased development under this Alternative could result in development occurring in locations outside of Framework designated centers and corridors that are less compatible with GHG reduction policies. Similar to the Proposed Plan, estimated GHG emissions associated with transportation emissions in the Project Area would be less than existing conditions due to lower vehicle exhaust resulting from lower vehicle emissions resulting from increased engine efficiency and cleaner burning fuels. However, because the No Project Alternative is a continuation of the Existing Plan, future development would not be directed toward major transit nodes. As a result, this Alternative would not be consistent with the Framework Element, AB 32, SB 32, SB 375, 2016-2040 RTP/SCS, and other regional strategies to reduce GHG. Therefore, while overall emissions in the plan area would be reduced, impacts related to consistency with GHG reduction plans would be greater than the Proposed Plan and would be significant and unavoidable.

[5]Section 5097.98 outlines the Native American Heritage Commission notification process and the appropriate procedures if the County Coroner determines the human remains to be Native American.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but greater impacts related to GHG compared to the Proposed Plan. The Reduced Alternative would be consistent with applicable GHG plans, policies, and regulations, as a result of the concentration of future development in major transit areas under this Alternative. Similar to the Proposed Plan, Alternative 2 focuses new development at major transit nodes consistent with the Framework Element, AB 32, SB 32, SB 375, and SCAG policies, in order to increase transit ridership and reduce automobile dependence, which contributes to the reduction of GHG emissions in the long-term compared to unplanned growth that is dispersed throughout the CPA. Furthermore, estimated emissions would be less than existing conditions due to lower vehicle exhaust resulting from increased engine efficiency and cleaner burning fuels. This Alternative would not result in as much density next to transit as the Proposed Plan, which, regionally, could result in development occurring in locations less compatible with GHG reductions policies. Overall, impacts related to GHG emissions and consistency with GHG reduction plans would be greater than the Proposed Plan but would still be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in greater impacts related to GHG compared to the Proposed Plan. Under the Targeted Corridors Alternative, future growth is concentrated along targeted corridors of the Hollywood CPA, however, in contrast to the Proposed Plan, Alternative 3 would not focus growth at heavy rail transit nodes. As a result, the Targeted Corridors Alternative would be partially consistent with GHG reduction plans (e.g., AB 32, SB 32, SB 375) compared to the Proposed Plan. Nonetheless, impacts related to consistency with applicable GHG plans, policies and regulations would remain less than significant. Similar to the Proposed Plan, estimated emissions under the Targeted Corridors Alternative would be less than existing conditions due to lower vehicle exhaust resulting from increased engine efficiency and cleaner burning fuels. Similar to the Proposed Plan, impacts related to GHG emissions and consistency with GHG reduction plans would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar, but reduced impacts related to GHG compared to the Proposed Plan. Similar to the Proposed Plan, the High TOD Alternative focuses development potential at major transit nodes consistent with the Framework Element, AB 32, SB 32, SB 375, and SCAG policies, in order to increase transit ridership and reduce automobile dependence, which contributes to the reduction of GHG emissions in the long-term compared to unplanned growth that is dispersed throughout the CPA. Therefore, Alternative 4 would be consistent with applicable GHG plans, policies, and regulations, as a result of the concentration of future development in major transit areas under this Alternative. Furthermore, estimated emissions would be less than existing conditions due to lower vehicle exhaust resulting from increased engine efficiency and cleaner burning fuels. Therefore, similar to the Proposed Plan, impacts related to GHG emissions and consistency with GHG reduction plans would be less than significant.

HAZARDS AND HAZARDOUS MATERIALS

Alternative 1: No Project. Compared to the Proposed Plan, Alternative 1 would result in greater impacts related to hazardous materials as a result of site disturbance or redevelopment of sites that have previously used hazardous materials on site. Due to the age of development in the Project Area, some properties likely have structures that contain Asbestos-Containing Materials (ACMs) and Lead-Based Paint (LBPs). Likewise, there are some properties within the Project Area with potential hazardous concerns. Future development in the Project Area under the No Project Alternative would be required to comply with federal and state regulations regarding materials containing ACMs and LBPs similar to the Proposed Plan. Implementation of the No Project Alternative would also allow development on sites currently or historically used for industrial uses that may have used hazardous materials in their operations similar to the Proposed Plan. The use of hazardous materials is typically associated with industrial land uses, and there are several clusters of low-intensity industrial uses scattered throughout the Project Area. Therefore, because unknowns may exist with regard to existing soil or other contaminants in the areas currently or historically zoned as industrial in the Project Area, there is the possibility that future development may

uncover previously undiscovered soil and other forms of contamination and since Alternative 1 would not include Mitigation Measure **HM1**, the impact related to unknown hazardous materials would be significant and unavoidable. Compliance with applicable regulations would ensure that future development under Alternative 1 would not create a significant hazard to the public, schools, or the environment through the transport, use, and disposal of hazardous materials. Similar to the Proposed Plan, Alternative 1 would not impair implementation of, or physically interfere with, the Safety Element of the City's General Plan, as it would not introduce new streets or otherwise change the overall land use pattern in the Project Area.

Alternatives 2 through 4. Alternatives 2 through 4 would result in similar impacts related to hazards and hazardous materials as compared to the Proposed Plan. Due to the age of development in the Project Area, some properties likely have structures that contain Asbestos-Containing Materials (ACMs) and Lead-Based Paint (LBPs). Likewise, there are numerous properties within the Project Area with potential hazardous concerns. Future development in the Project Area under Alternatives 2 through 4 would be required to comply with federal and state regulations regarding materials containing ACMs and LBPs similar to the Proposed Plan. Implementation of Alternatives 2 through 4 would also allow development on sites currently or historically used for industrial uses that may have used hazardous materials in their operations similar to the Proposed Plan. The use of hazardous materials is typically associated with industrial land uses, and there are several clusters of low-intensity industrial uses scattered throughout the Project Area. Therefore, because unknowns may exist with regard to existing soil or other contaminants in the areas currently or historically zoned as industrial in the Project Area, there is the possibility that future development may uncover previously undiscovered soil and other forms of contamination, including the release of hazardous materials. If one of Alternatives 2 through 4 is adopted with Mitigation Measure **HM1** imposed, the impact will be less than significant, but if the mitigation measure is not adopted the impact will be significant and unavoidable. Compliance with applicable regulations would ensure that future development under Alternatives 2 through 4 would not create a significant hazard to the public, schools, or the environment through the transport, use, or disposal of hazardous materials. Similar to the Proposed Plan, Alternatives 2 through 4 would not impair implementation of, or physically interfere with, the Safety Element of the City's General Plan, as the alternatives would not introduce new streets or otherwise change the overall land use pattern in the Project Area. Therefore, similar to the Proposed Plan, impacts related to hazards and hazardous materials under Alternatives 1 through 4 would be less than significant or have no impact similar to the Proposed Plan.

HYDROLOGY AND WATER QUALITY

Alternatives 1 through 4. Alternatives 1 through 4 would result in no impacts or less than significant impacts related to hydrology and water quality compared to the Proposed Plan. Similar to the Proposed Plan, the overall land use patterns of the Project Area would remain relatively unchanged under Alternatives 1 through 4 compared to existing conditions. The undeveloped open space areas within the Project Area would remain undeveloped under Alternatives 1 through 4. Thus, the rate and volume of stormwater runoff within the Project Area would remain relatively unchanged since only a modest amount of the remaining developable land in the Project Area is vacant or undeveloped. In addition, because the overall land use patterns of the Project Area would remain relatively unchanged, Alternatives 1 through 4, potential changes in the types of pollutants in stormwater runoff would be similar to existing conditions. Alternatives 1 through 4 do not contain any specific guidelines or changes that would violate any water quality standards or waste discharge requirements which are subject to the federal, state, and local standards and regulations. Therefore, similar to the Proposed Plan, impacts related to hydrology and water quality under Alternatives 1 through 4 would be less than significant and/or have no impact.

LAND USE AND PLANNING

Alternative 1: No Project Alternative. Alternative 1 would result in greater impacts related to land use and planning compared to the Proposed Plan. The No Project Alternative is the continuation of the existing 1988 Hollywood Community Plan (Existing Plan). Similar to the Proposed Plan, the No Project Alternative does not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. However, under the No Project Alternative, no changes to existing zoning and General Plan land use designations would occur, regardless of the known inconsistencies between existing and surrounding land uses, zoning and/or General Plan land use designations. In addition, the CPIO District, which would have regulatory protections for historical resources as well as regulations for pedestrian-oriented design, would not be established, and future development within the Project Area would not be subject to the Proposed Plan's applicable development regulations or policies. Additionally, planning in the Project Area would not be updated to address state and regional requirements to reduce GHG emissions consistent with SB 375 and the SCAG SCS. Therefore, impacts related to land use and planning under the No Project Alternative would be greater than the Proposed Plan and significant and unavoidable.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in greater impacts related to land use and planning compared to the Proposed Plan. Similar to the Proposed Plan, the Reduced Alternative does not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. Consistent with City's General Plan Framework Element, as well other City and SCAG policies, which call for new growth to be directed towards transit, the Reduced Alternative focuses development potential at transit stations and corridors within the Project Area with less development potential for housing and population compared to the Proposed Plan. Since Alternative 2 would not result in as much density next to transit as the Proposed Plan, regionally it could result in development occurring in locations outside of Framework identified centers and corridors. However, the Reduced Alternative would still meet SCAG's 2040 population, housing and employment projections for the Project Area. This Alternative would reduce the allowable base FAR in selected Regional Center subareas, the FAR along selected corridors and maintain and/or set a reduced residential density in selected High Medium Residential subareas. Similar to the Proposed Plan, future development would be subject to the new applicable design and neighborhood compatibility protections, as well as the CPIO District, which will have regulatory protections for historical resources and pedestrian-oriented design regulations. Therefore, impacts related to land use and planning under the Reduced Alternative would be greater than the Proposed Plan but would still be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in greater impacts related to land use and planning compared to the Proposed Plan. Similar to the Proposed Plan, this Alternative does not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. Under the Targeted Corridors Alternative, growth would be less concentrated in the Regional Center and would be dispersed more in the Project Area along designated corridors instead of focused around rail stations compared to the Proposed Plan. Compared to the Proposed Plan, the same amount of growth would occur under the Targeted Corridors Alternative, but it would be less concentrated in the Regional Center and would be dispersed more throughout the Hollywood CPA along the designated corridors. Similar to the Proposed Plan, future development would be subject to the new applicable design and neighborhood compatibility protections, as well as the CPIO District, which will have regulatory protections for historical resources and pedestrian-oriented design standards. Therefore, impacts related to land use and planning under the Targeted Corridors Alternative would be greater than the Proposed Plan but would still be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in greater impacts related to land use and planning compared to the Proposed Plan. Similar to the Proposed Plan, this Alternative does not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. The High TOD Alternative would increase opportunities for TOD development around heavy rail infrastructure within the Project Area and concentrate new housing, population, and employment at the five Metro Red Line station areas in the CPA, including East Hollywood. The High TOD Alternative would also extend the Regional Center land use designation east of the 101 Freeway to selected areas near the Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica stations, which are outside of the Framework identified Regional Centers. Similar to the Proposed Plan, future development under Alternative 4 would be subject to applicable new design and neighborhood compatibility protections, as well as the CPIO District, which will have regulatory protections for historical resources and pedestrian-oriented design regulations. Therefore, impacts related to land use and planning under the Alternative 4 would be greater than the Proposed Plan but would still be less than significant.

MINERAL RESOURCES

Alternatives 1 through 4. Alternatives 1 through 4 would result in similar impacts related to mineral resources compared to the Proposed Plan. Portions of the Project Area are classified as MRZ-2 which indicates the presence of significant mineral resources. The MRZ-2 classified areas within the Project Area include Griffith Park, Mount Hollywood, Spring Canyon, Fern Canyon, Interstate 5, and State Route 134. Regardless of the MRZ-2 classification, the existing zoning and land use designations do not allow for the extraction of mineral resources, and resource recovery does not occur in the Project Area. Similar to the Proposed Plan, Alternatives 1 through 4 do not include provisions to reduce the availability of mineral resources or include policies that would encourage extraction of known mineral resources in the Project Area. Because of the urban nature of the Project Area, mining activities would likely be incompatible with existing uses. The Project Area is not underlain with active oil fields, and the existing oil wells located in the Project Area are inactive and designated as buried-idle, plugged or idle. Similar to the Proposed Plan, Alternatives 1 through 4 do not include provisions that would introduce new oil districts or oil producing uses and do not include provisions to reduce the availability of these resources. Therefore, similar to the Proposed Plan, there would be no impacts related to mineral resources under Alternatives 1 through 4.

NOISE

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced impacts (as a result of less anticipated new development) related to noise and vibration compared to the Proposed Plan. Similar to the Proposed Plan, construction activity occurring within the Hollywood CPA under the No Project Alternative would result in temporary increases in noise and vibration levels on an intermittent basis. In the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would result in significant impacts similar to the Proposed Plan. The No Project Alternative would not be subject to Mitigation Measures **N1** to **N4** that would reduce construction-related noise and vibration impacts, although likely project-specific environmental review would impose similar requirements on discretionary projects. Nonetheless, Alternative 1 would result in significant and unavoidable impacts related to construction noise and groundborne vibration similar to the Proposed Plan (although total construction would be less under Alternative 1). Total mobile source noise exposure would increase over existing conditions because of increased VMT under the No Project Alternative. However, total mobile source noise exposure would be less compared to the Proposed Plan due to Alternative 1 resulting in less VMT than the VMT of the Proposed Plan. Similar to the Proposed Plan, new development may border residential areas, leading to noise incompatibility between land uses and operational noise from stationary sources. However, mobile noise would not increase significantly on area roadways and would be less than significant, similar to the Proposed Plan. It is not anticipated that the Hollywood CPA would be developed with substantial sources

of noise or vibration (e.g., certain loud industrial processes). Therefore, similar to the Proposed Plan, the No Project Alternative would result in significant and unavoidable impacts related to construction noise, groundborne vibration noise from construction, and permanent noise increase from operational stationary sources, and impacts related to operational vibration noise and permanent noise increase from mobile sources would be less than significant.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced impacts (as a result of less anticipated new development) related to noise and vibration compared to the Proposed Plan. Similar to the Proposed Plan, construction activity occurring within the Hollywood CPA would result in temporary increases in noise and vibration levels on an intermittent basis, and new development could border residential areas leading to noise incompatibility between land uses. In the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would exceed the City's thresholds of significance similar to the Proposed Plan. However, because development under Alternative 2 would be generally reduced (by approximately 4,000 housing units, 8,000 residents and with a similar number of jobs) compared to the Proposed Plan, noise associated with construction of future development would be less. If the Reduced Alternative is adopted with Mitigation Measures **N1** to **N4** imposed**,** construction-related noise and vibration impacts would be reduced, although not to a less-than-significant level. Under the Reduced Alternative, total mobile source noise exposure would be less than the Proposed Plan due to Alternative 2 resulting in less VMT. Therefore, similar to the Proposed Plan, mobile noise under Alternative 2 would not generate a significant increase in ambient noise levels and would be less than significant. It is not anticipated that the Hollywood CPA would be developed with substantial sources of noise or vibration (e.g., certain loud industrial processes) under Alternative 2. Therefore, although incrementally less than the Proposed Plan as a result of less overall development, the Reduced Alternative would result in significant and unavoidable impact related to construction noise, groundborne vibration noise from construction, and permanent noise increase from operational stationary sources, and impacts related to operational vibration noise and permanent noise increase from mobile sources would be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar, impacts related to noise and vibration as compared to the Proposed Plan. Similar to the Proposed Plan, construction activity occurring within the Hollywood CPA would result in temporary increases in noise and vibration levels on an intermittent basis, and new development could border residential areas leading to noise incompatibility between land uses. In the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would exceed the City's thresholds of significance similar to the Proposed Plan. The Targeted Corridors Alternative would result in the same anticipated population, housing and employment as the Proposed Plan, but it would be less concentrated in the Regional Center and would be dispersed more in the Hollywood CPA along designated corridors. Therefore, noise associated with construction of future development would be similar but more dispersed. If the Targeted Corridors Alternative is adopted with Mitigation Measures **N1** to **N4** imposed, construction-related noise and vibration impacts would be reduced, although not to a less-than-significant level. Alternative 3 results in a greater total mobile source noise exposure due to increased VMT. However, similar to the Proposed Plan, mobile noise would not generate a significant increase in ambient noise levels and would be less than significant. It is not anticipated that the Hollywood CPA would be developed with substantial sources of noise or vibration (e.g., certain loud industrial processes) under Alternative 3. Therefore, similar to the Proposed Plan, the Targeted Corridors Alternative would result in significant and unavoidable impact related to construction noise, ground borne vibration noise from construction, and permanent noise increase from operational stationary sources, and impacts related to operational vibration noise and permanent noise increase from mobile sources would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar, impacts related to noise and vibration as compared to the Proposed Plan. Similar to the Proposed Plan, construction activity occurring within the Hollywood CPA would result in temporary increases in noise and vibration levels on an intermittent basis, and new development may border residential areas leading to noise incompatibility between land uses. In the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would exceed the City's thresholds of significance similar to the Proposed Plan. The High TOD Alternative would result in the same population, housing and employment development potential as the Proposed Plan, but would direct the growth to the five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. The High TOD Alternative would also expand the Regional Center land use designation east of the 101 Freeway to selected areas near the Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica Metro stations. Therefore, noise associated with construction of future development would be similar, but concentrated near the five Metro Red Line station areas. If the High TOD Alternative is adopted with Mitigation Measures **N1** to **N4** imposed, construction-related noise and vibration impacts would be reduced, although not to a less-than-significant level. Alternative 4 would result in a less total mobile source noise exposure due to increased VMT. However, similar to the Proposed Plan, mobile noise would not generate a significant increase in ambient noise levels and would be less than significant. It is not anticipated that the Hollywood CPA would be developed with substantial sources of noise or vibration (e.g., certain loud industrial processes) under Alternative 4. Therefore, similar to the Proposed Plan, the High TOD Alternative would result in significant and unavoidable impact related to construction noise, groundborne vibration noise from construction, and permanent noise increase from operational stationary sources, and impacts related to operational vibration noise and permanent noise increase from mobile sources would be less than significant.

POPULATION, HOUSING AND EMPLOYMENT

Alternative 1: No Project Alternative. Alternative 1 would result in less impacts related to population, housing and employment compared to the Proposed Plan. Similar to the Proposed Plan, Alternative 1 would not result in the substantial displacement of housing or people as no housing units are specifically proposed to be demolished, converted to market rate, or removed through other means. Based on existing development potential under the Existing Plan's land use designations, the No Project Alternative would result in 113,000 to 121,000 housing units, 226,000 to 243,000 residents, and 119,000 jobs. Compared to the Proposed Plan, the No Project Alternative would result in 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer persons and 5,000 to 8,000 fewer jobs. Similar to the Proposed Plan, impacts related to population, housing and employment under the No Project Alternative would be less than significant.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in less impacts related to population, housing and employment compared to the Proposed Plan. Similar to the Proposed Plan, the Reduced Alternative would not result in the substantial displacement of housing or people as no housing units are specifically proposed to be demolished, converted to market rate, or removed through other means. While the Reduced Alternative would meet SCAG's 2040 population, housing and employment projections for the Project Area, the development potential of the Project Area would be reduced compared to the Proposed Plan. The reasonably expected development potential under the Reduced Alternative would be approximately 117,000 to 128,000 housing units, 235,000 to 256,000 residents, and 124,000 to 127,000 jobs. Compared to the Proposed Plan, the Reduced Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer residents and a similar number of jobs. Therefore, similar to the Proposed Plan, impacts related to population, housing and employment under the Reduced Alternative would be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar impacts related to population, housing and employment compared to the Proposed Plan. Similar to the Proposed Plan, the Targeted Corridors Alternative would not result in the substantial displacement of housing or people as no housing units are specifically proposed to be demolished, converted to market rate, or removed through other means. However, compared to the Proposed Plan, the growth would be less concentrated in the Regional Center and would be dispersed more throughout the Project Area. Nonetheless, the Targeted Corridors Alternative would meet the same population, housing and employment projections anticipated in the Proposed Plan. Therefore, similar to the Proposed Plan, impacts related to population, housing and employment under the Targeted Corridors Alternative would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar impacts related to population, housing and employment compared to the Proposed Plan. Similar to the Proposed Plan, the High TOD Alternative would not result in the substantial displacement of housing or people as no housing units are specifically proposed to be demolished, converted to market rate, or removed through other means. However, compared to the Proposed Plan, the growth would be concentrated at all five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. Nonetheless, the High TOD Alternative would meet the same population, housing and employment projections anticipated in the Proposed Plan. Therefore, similar to the Proposed Plan, impacts related to population, housing and employment under the High TOD Alternative would be less than significant.

PUBLIC SERVICES

Alternatives 1 through 4. Alternatives 1 through 4 would result in similar impacts related to public services compared to the Proposed Plan. Alternatives 1 through 4 would be expected to have increased development compared to existing conditions, also increased demand for schools, police and fire services, parks, and/or library facilities. The demand for these services under Alternatives 1 and 2 would be less than the Proposed Plan. Over the 20-year Plan horizon, this increased demand could result in the need for, and construction of new or expanded police, fire, park, and library facilities. It is assumed that such facilities would occur where allowed under the designated land use. The environmental impacts of the construction and operation of new facilities, as an allowed land use, have been evaluated throughout this EIR. Therefore, similar to the Proposed Plan, impacts related to the construction of new or expanded fire, police, and library facilities under Alternatives 1 through 4 would be less than significant. However, similar to the Proposed Plan, any increase in population would exacerbate the existing deficit in parks in the Project Area, resulting in the substantial physical deterioration of existing park facilities creating a significant and unavoidable impact under Alternatives 1 through 4 (although less than the Proposed Project for Alternatives 1 and 2).

TRANSPORTATION AND TRAFFIC

The newly approved method of studying Vehicle Miles Traveled (VMT) is utilized to evaluate traffic impacts under CEQA. VMT is a measure of the number of miles being driven within a defined area, and are based on the number of vehicle trips multiplied by the average trip length (in miles) for various trip types. To obtain an average VMT per service population, the total VMT is divided by the total population and employees within the area of analysis. The metrics used are from the updated CEQA Guidelines adopted by the Natural Resources Agency in late December 2018. See the Recirculated Draft EIR Section 4.15 Transportation and Traffic for more information.

Table 5-4 provides a comparison of the 2016 SCAG Region VMT to the Proposed Plan and the five alternatives in 2040. The SCAG Region represents six counties in Southern California, including Los Angeles County. **Table 5-5** provides a comparison of the 2016 Baseline VMT for the Plan Area to the Proposed Plan and the five alternatives. Additional transportation performance metrics for the Proposed Plan and the five alternatives are presented in **Table 5-6** to inform congestion as it relates to the emergency access impact analysis.

TABLE 5-4: COMPARISON BETWEEN THE 2016 SCAG REGION VMT, THE 2040 PROPOSED PLAN AND ALTERNATIVES

Transportation Metrics	2016 SCAG Region Conditions	Proposed Plan	Alternative 1: No Project Alternative*	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative
Daily Vehicle Miles Traveled (VMT)	948,656,000	5,901,000	5,708,000	5,876,500	5,972,600	5,876,500
Daily VMT per Service Population	35.4	15.2	16.5	15.3	15.3	15.0
Comparison to 2016 SCAG Region Conditions	--	-57%	-53%	-57%	-57%	-58%

Note: For the purpose of the Alternatives analysis, the comparison is shown here to Year 2040 Plan "Option 2" Alternative metrics estimated based on sensitivity tests conducted with Hollywood Travel Demand Model.
* Alternative 5 (SCAG Forecast Alternative) would generally have similar transportation metrics as Alternative 1, except Alternative 5 would assume less development in the Regional Center and more development in other parts of the CPA than Alternative 1.
SOURCE: Fehr & Peers, 2019.

TABLE 5-5: COMPARISON BETWEEN THE 2016 CPA BASELINE VMT, THE 2040 PROPOSED PLAN AND ALTERNATIVES

Transportation Metrics	2016 CPA Baseline Conditions	Proposed Plan	Alternative 1: No Project Alternative*	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative
Daily Vehicle Miles Traveled (VMT)	5,624,000	5,901,000	5,708,000	5,876,500	5,972,600	5,876,500
Comparison to 2016 Baseline Conditions	--	5%	1%	4%	6%	4%
Daily VMT per Service Population	18.3	15.2	16.5	15.3	15.3	15.0
Comparison to 2016 Baseline Conditions	--	-17%	-10%	-16%	-16%	-18%

Note: For the purpose of the Alternatives analysis, the comparison is shown here to Year 2040 Plan "Option 2" Alternative metrics estimated based on sensitivity tests conducted with Hollywood Travel Demand Model.
* Alternative 5 (SCAG Forecast Alternative) would generally have similar transportation metrics as Alternative 1, except Alternative 5 would assume less development in the Regional Center and more development in other parts of the CPA than Alternative 1.
SOURCE: Fehr & Peers, 2019.

TABLE 5-6: COMPARISON OF ADDITIONAL TRANSPORTATION PERFORMANCE METRICS BETWEEN EXISTING TRAFFIC CONDITIONS, THE PROPOSED PLAN AND ALTERNATIVES

Transportation Metrics	Existing Conditions (2016)	Proposed Plan	Alternative 1: No Project Alternative*	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative
AM Peak Period	0.876	0.972	0.935	0.971	0.975	0.971
Weighted Average V/C	(LOS D)	(LOS E)	(LOS E)	(LOS E)	(LOS E)	(LOS E)
Percentage (%) of Street Segments at LOS E or F	37%	49%	42%	49%	50%	49%
PM Peak Period	0.89	1.017	0.955	1.016	1.020	1.015
Weighted Average V/C	(LOS D)	(LOS F)	(LOS E)	(LOS F)	(LOS F)	(LOS F)
Percentage (%) of Street Segments at LOS E or F	37%	50%	43%	50%	51%	50%

Note: For the purpose of the Alternatives analysis, the comparison is shown here to Year 2040 Plan "Option 2" Alternative metrics estimated based on sensitivity tests conducted with Hollywood Travel Demand Model.
* Alternative 5 (SCAG Forecast Alternative) would generally have similar transportation metrics as Alternative 1, except Alternative 5 would assume less development in the Regional Center and more development in other parts of the CPA than Alternative 1.
SOURCE: Fehr & Peers, 2019.

Alternative 1: No Project Alternative. Alternative 1 would result in less daily VMT than the Proposed Plan. However, daily VMT per service population is higher under this Alternative than for the Proposed Plan. In contrast to the Proposed Plan, the growth in housing and jobs is more dispersed across the Hollywood CPA rather than concentrated around transit, such as the Metro Red Line stations. The No Project Alternative assumes a continuation of the Existing Plan and reasonably foreseeable planned transportation network projects.

Similar to the Proposed Plan, the No Project Alternative would not result in significant impacts related to increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) or result in inadequate emergency access. Additional metrics indicate that the peak period weighted average V/C is improved under Alternative 1 compared to the Proposed Plan, but in both periods the network degrades to LOS E compared to LOS D under Existing Conditions. Therefore, it would result in similar congestion impacts but similar to the Proposed Plan, it is expected that LAFD will ensure adequate fire and emergency response and there will be less than significant impacts to emergency access. Alternative 1 would result in slightly greater but still less than significant impacts when compared to applicable transportation plans and policies as it does not contain the network enhancements identified in MP 2035 and incorporated into the Proposed Plan. Impacts to the transportation network under Alternative 1 would be less than significant as under the Proposed Plan.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in less daily VMT compared to the Proposed Plan, although daily VMT per service population would increase slightly. The Reduced Alternative assumes the same transportation network enhancements as the Proposed Plan. However, the potential development of housing would be less than the Proposed Plan. As a result of less anticipated development this alternative would result in similar but reduced impacts related to hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and similar but reduced impacts related to inadequate emergency access. Additional metrics indicate that the peak period weighted average V/C under this Alternative would be slightly better compared to the Proposed Plan, as would be the percentage of roadway miles operating at LOS E or worse. Therefore, it would result in slightly decreased congestion impacts but similar to the Proposed Plan, it is expected that LAFD will ensure adequate fire and emergency response and there will be less than significant impacts to emergency access. This Alternative contains the network enhancements identified in MP 2035 and incorporated into the Proposed Plan; however, the reduced densities adjacent to transit would result in similar but still less than significant impacts when compared to applicable transportation plans and policies. Impacts to the transportation network under Alternative 2 would be less than significant as under the Proposed Plan.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in more daily VMT and daily VMT per service population compared to the Proposed Plan. The Targeted Corridors Alternative assumes the same transportation network enhancements as the Proposed Plan, but instead disperses reasonably expected development along major and/or selected boulevards in the Hollywood CPA. The Targeted Corridors Alternative would disperse reasonably expected development more along targeted corridors rather than concentrated near heavy rail stations, which would result in similar but greater impacts when comparing the alternative to applicable transportation plans and policies; similar but greater impacts related to hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and similar but greater impacts to emergency access. Additional metrics indicate that the peak period weighted average V/C in this Alternative would be slightly worse compared to the Proposed Plan, as would be the percentage of the road network operating at LOS E or worse. Therefore, it would result in slightly greater congestion impacts but similar to the Proposed Plan, it is expected that LAFD will ensure adequate fire and emergency response and there will be less than significant impacts to emergency access. This Alternative contains the network enhancements identified in MP 2035 and incorporated into

the Proposed Plan. Impacts to the transportation network under Alternative 3 would be less than significant as under the Proposed Plan.

Alternative 4: High TOD Alternative. Alternative 4 would result in slightly lower daily VMT and daily VMT per service population compared to the Proposed Plan. The High TOD Alternative assumes the same transportation network enhancements as the Proposed Plan, but instead concentrates development potential for housing and employment around the five major transit stations along the Metro Red Line. The High TOD Alternative would result in similar impacts when comparing the alternative to applicable transportation plans and policies; similar impacts related to increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and similar impacts to emergency access. Additional metrics indicate that peak period weighted average V/C in Alternative 4 would be expected to be slightly better than the Proposed Plan, as would be the percentage of road miles operating at LOS E or worse. Therefore, it would result in slightly decreased congestion impacts but similar to the Proposed Plan, it is expected that LAFD will ensure adequate fire and emergency response and there will be less than significant impacts to emergency access. This Alternative contains the network enhancements identified in MP 2035 and incorporated into the Proposed Plan. Impacts to the transportation network under Alternative 4 would be less than significant as under the Proposed Plan.

UTILITIES AND SERVICES SYSTEMS

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced impacts related to utilities and services systems as compared to the Proposed Plan. Compared to the Proposed Plan, the No Project Alternative would result in 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer residents and 5,000 to 8,000 fewer jobs. Therefore, although new development under the Existing Plan would increase the demand for utilities and service systems, the demand under the No Project Alternative would be less than the Proposed Plan. Impacts related to utilities and service systems under Alternative 1 would be less than significant.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced (as a result of less anticipated development) impacts related to utilities and services systems as compared to the Proposed Plan. Compared to the Proposed Plan, the Reduced Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer persons and a similar number of jobs. Therefore, although new development under the Reduced Alternative would increase the demand for utilities and service systems, the demand under the Reduced Alternative would be less than the Proposed Plan. Impacts related to utilities and service systems under Alternative 2 would be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar impacts related to utilities and services systems as compared to the Proposed Plan. The Targeted Corridors Alternative would result in the same population, housing and employment development potential as for the Proposed Plan. Therefore, the demand for utilities and service systems under the Targeted Corridors Alternative would be similar to the Proposed Plan. Impacts related to utilities and service systems under Alternative 3 would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar impacts related to utilities and services systems as compared to the Proposed Plan. The High TOD Alternative would result in the same population, housing and employment development potential as for the Proposed Plan. Therefore, the demand for utilities and service systems under the High TOD Alternative would be similar to the Proposed Plan. Impacts related to utilities and service systems under Alternative 4 would be less than significant.

5.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in an EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

Based on the ability to result in reduced environmental impacts and meet project objectives, the Reduced Alternative (Alternative 2) is the Environmentally Superior Alternative. None of the alternatives analyzed are capable of avoiding the significant and unavoidable impacts that would occur under the Proposed Plan. However, the Reduced Alternative would reduce the severity of the Proposed Plan's significant and unavoidable impacts related to air quality, historical resources, existing parks and recreational facilities, and noise.