IV. Environmental Impact Analysis

J. Traffic, Access, and Parking

1. Introduction

This section of the Draft EIR analyzes the proposed Project's potential impacts on traffic, access, and parking. This section is based on the *Transportation Study for the Arts Club West Hollywood Project* dated September 2017 (Traffic Study), prepared by Gibson Transportation Consulting, Inc. (see Appendix H to this Draft EIR). This Traffic Study was prepared in accordance with City of West Hollywood (City) guidelines, adopted policies, procedures, and standards, as detailed in the *Traffic Study Thresholds* (City of West Hollywood Community Development Department, October 2009), and provides a comprehensive analysis of the potential traffic impacts associated with the proposed Project. The scope for the traffic analysis was developed in consultation with the City, in coordination with adjacent jurisdictions (i.e., City of Beverly Hills and City of Los Angeles), and in consideration of input received during the public scoping process. The assumptions, technical methodologies, and geographic coverage of the study area were identified as part of the study approach, which was reviewed and approved by the City.

The Traffic Study evaluates the potential Project-generated traffic impacts on the street system surrounding the Project Site as compared to Existing Conditions (Year 2016) and Future Conditions (Year 2020). Intersection traffic impacts for the proposed Project were evaluated for typical weekday morning (7:00 A.M. to 9:00 A.M.) and afternoon (4:00 P.M. to 6:00 P.M.) peak periods. A total of eight intersections in the vicinity of the Project Site were selected for detailed traffic analysis in coordination with City staff. The analysis of future year traffic forecasts was conducted for assuming full buildout of the proposed Project in 2020 and is based on projected conditions in year 2020 both with and without the addition of Project traffic. Accordingly, the following traffic scenarios were developed and analyzed as part of this study:

- Existing Conditions (Year 2016)—The analysis of existing 2016 traffic conditions provides a basis for the assessment of existing and future traffic conditions with the addition of Project traffic. The Existing Conditions analysis includes a description of key area streets and highways, traffic volumes and current operating conditions, and transit service in the Project Site vicinity. The Existing Conditions reflect conditions at the time the Notice of Preparation (NOP) was issued in April 2016. Intersection turning movement counts for typical weekday morning and afternoon peak periods and fieldwork (lane configurations and

signal phasing) for the analyzed intersections were collected in 2015. Traffic counts collected in year 2015 were utilized due to atypical traffic conditions, resulting from ongoing construction activities on Sunset Boulevard during the time of the NOP (Year 2016). The City of West Hollywood typically allows for the utilization of traffic counts conducted within two years of the NOP, as the City has determined that traffic volumes and patterns remain generally consistent over a two-year period if no significant changes (e.g., roadway improvements, construction activities, etc.) have occurred. To provide a conservative analysis, an annual ambient traffic growth rate of one (1) percent was applied to the traffic counts to reflect regional growth and development between year 2015 and the existing year 2016.

- Existing Plus Project Conditions (Year 2016)—This analysis evaluates the potential intersection operating conditions that could be expected if the proposed Project were built in 2016 given the existing street system and traffic volumes. In this analysis, the proposed Project's-generated traffic is added to the Existing Conditions (2016) traffic volumes.

- Future Without Project Conditions (Year 2020)—This analysis evaluates the potential intersection operating conditions that could be expected as a result of regional growth and related project traffic in the vicinity of the Project Site by year 2020. This analysis provides the baseline conditions by which the proposed Project's potential impacts are evaluated in the future at full buildout. In addition, an annual ambient growth factor of one (1) percent was applied to the Existing Conditions traffic volumes to reflect regional growth and development between Existing Conditions (Year 2016) and full Project Buildout (Year 2020).

- Future Plus Project Conditions (Year 2020)—This analysis evaluates the potential intersection operating conditions that could be expected if the proposed Project were built in the projected buildout year (2020) by adding the proposed Project's traffic to the Future without Project Conditions (2020) traffic volumes. In addition, an annual ambient growth factor of 1 percent was applied to the Existing Conditions traffic volumes to reflect regional growth and development between Existing Conditions (Year 2016) and full Project Buildout (Year 2020).

2. Environmental Setting

a. Regulatory Framework

(1) California Senate Bill No. 743

In September 2013, California Governor Brown signed Senate Bill 743 (SB 743), which made several changes to CEQA for projects located in areas defined as "transit priority areas." SB 743 was intended to streamline review under CEQA for several categories of development projects including the development of infill projects in transit priority areas. Among other things, under SB 743 parking impacts are not considered

significant impacts under CEQA if a project is a residential, mixed-use residential, or employment center project and is located on an infill site within a transit priority area (Public Resources Code (PRC) Section 21099(d)(1)). This provision is currently in effect and does not require further amendments to the CEQA Guidelines by the Governor's Office of Planning and Research (OPR). As explained below, the proposed Project is considered an employment center project on an infill site within a transit priority area, as defined in PRC Section 21099.

PRC Section 21099(a) defines the following key terms as follows.

- "Employment center project" means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.
- "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- "Transit priority area" means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

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

The proposed Project is an employment center project as the Project Site is located on a property, the majority of which is zoned Sunset Specific Plan (SSP), which permits development of commercial uses and imposes a floor area ratio (FAR) of 1.5. The Project Site is currently developed entirely with commercial serving uses, including a two-story commercial building and a commercial parking lot.

The proposed Project is also located in a transit priority area. As detailed below, the Project Site is located less than a 0.5 mile from the intersection of several bus lines, including two CityLine bus routes, Metro Local Lines 2, 4, 10, 30, and 105, Metro Limited Lines 302 and 330, and Metro Rapid Bus Line 704. Metro Local Lines 2, 4, and 10 and Metro Limited Line 302, each provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods.

Accordingly, as an employment center project located in a transit priority area, the proposed Project is one of several types of projects whose parking impacts shall not be considered significant impacts on the environment. Therefore, the analysis regarding the proposed Project's parking is provided for informational purposes only. Nevertheless, as demonstrated in Section IV.J.5(d)(5) below, the parking impacts of the proposed Project were determined to be less than significant.

In addition SB 743 requires OPR to change the CEQA Guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis would shift from driver delay to reduction of greenhouse gas emissions (GHG), creation of multimodal networks and promotion mixed-use developments. On August 6, 2014, OPR released for public review a preliminary discussion draft of changes to the CEQA Guidelines. The second set of guidelines was released on January 20, 2016, and recommends that transportation impacts under CEQA be evaluated using vehicle miles traveled (VMT). Local jurisdictions will still be allowed to assess impacts using methodologies in addition to VMT. Once the guidelines are officially adopted, jurisdictions will have a two-year opt-in period to incorporate VMT thresholds into their CEQA-related transportation impact review for projects. Under these updated changes to the CEQA Guidelines, evaluation based on Level of Service (LOS) will no longer be considered as a basis for determining significant impacts in many parts of California. At this time, the City has not adopted new traffic study guidelines in accordance with SB 743, as the updated CEQA Guidelines are still being finalized. As such, this analysis is based on the City's current and existing traffic study guidelines, which use LOS and delay as a measure for significant transportation impacts under CEQA.

The proposed Project's transportation characteristics (e.g., its location, proximity to transit, access to other nearby destinations, pedestrian connections, bicycle amenities, etc.) would encourage non-auto modes of transportation, such as walking, bicycling, carpool, transit, etc., and, therefore, would reduce VMT to the Project Site and associated transportation-related GHG emissions.

The Project Site represents an urban/compact infill location within the City served by numerous transit lines and is located along the major corridor of Sunset Boulevard. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT. Furthermore, the proposed Project would be located within an area that offers access to other nearby retail and entertainment destinations. Access to on-site uses would be provided from existing pedestrian pathways, as well as from adequate bicycle parking. Streets within 0.5 mile of the Project Site are equipped with sidewalks, and intersections include marked crosswalks and/or countdown signal timers. The combined effects of these factors would reduce the proposed Project's anticipated vehicle trips by encouraging walking and other non-auto forms of transportation, which would result in

corresponding reductions in VMT and transportation-related emissions as compared to developments that do not benefit from the same transportation characteristics.

(2) Congestion Management Program

The Los Angeles County Congestion Management Program (CMP) is a state-mandated program enacted by the state legislature to address the increasing concern that urban congestion is affecting the economic vitality of the state and diminishing the quality of life in some communities. Within Los Angeles County, the Los Angeles County Metropolitan Transportation Authority (Metro) is responsible for planning and managing vehicular congestion and coordinating regional transportation policies. Metro prepared the 2010 Congestion Management Program for Los Angeles County, in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The program also seeks to propose transportation projects eligible to compete for state gasoline tax funds and to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel.

The CMP requires that new development projects analyze potential project impacts on CMP monitoring locations if an environmental impact report (EIR) is prepared for the project. The CMP requires that a traffic impact analysis (TIA) be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the A.M. or P.M. weekday peak hours (i.e., 7:00 P.M. to 9:00 A.M. or 4:00 P.M. to 6:00 P.M.) of adjacent street traffic. If, based on this threshold, a TIA identifies no facilities for study, no further traffic analysis is required. The CMP TIA guidelines also require that a traffic study analyze traffic conditions at all CMP mainline freeway monitoring locations where a project would add 150 or more trips in either direction during either A.M. or P.M. weekday peak hours (a freeway mainline is the freeway segment between the ramps.) If, based on this criterion, a traffic study identifies no facilities for study, then no further traffic analysis is required.

The analysis of potential impacts to the CMP arterial and freeway monitoring stations was performed in accordance with the TIA guidelines referenced in the CMP. The CMP also requires that a transit system analysis be performed to determine whether a project adds ridership that exceeds the capacity of the transit system.

(3) Southern California Association of Governments' 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016–2040 RTP/SCS identifies mobility, accessibility, sustainability, and

high quality of life as the principles that are most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, SB 375, requires SCAG and other Metropolitan Planning Organizations (MPOs) throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions (GHG) through integrated transportation, land use, housing and environmental planning.[1] Within the 2016-2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[2] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.[3] The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS.[4,5] Please refer to Section IV.G, Land Use, for a detailed discussion of the applicable provisions of the 2016–2040 RTP/SCS that apply to the proposed Project.

(4) City of West Hollywood General Plan

The City of West Hollywood General Plan 2035 (General Plan) Circulation Element (Chapter 6, Mobility), which was adopted in September 2011, identifies goals, objectives, and policies regarding traffic, parking, and circulation in the City. The City of West Hollywood Draft Pedestrian and Bicycle Mobility Plan (April 2017) provides a vision and set of prioritized strategies and tools to enhance the City's streets to be more comfortable, safe, and inviting to pedestrians and bicyclists. The following goals and policies regarding traffic, parking, and circulation are relevant to the proposed project:

- M-1.3: Consider requiring development projects to include transit amenities and transit incentive programs.

---

[1] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, p. 166.*

[2] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, p. 189.*

[3] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, p. 76.*

[4] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

[5] *Los Angeles County Metropolitan Transportation Authority (Metro). "High Quality Transit Areas—Southwest Quadrant."*

- M-3: Maintain and enhance a pedestrian-oriented City.

- M-3.2: Seek to prioritize space for pedestrians and bicycles in the design and improvement of public rights of way.

- M-3.3: Implement improvements indentified in the adopted Bicycle and Pedestrian Mobility Plan as funding becomes available.

- M-3.8: Seek to minimize the negative impacts of parking for the pedestrian realm and accommodate bicycles, carpool and carshare vehicles, and other modes of transit wherever possible in the design of public parking.

- M-3.9: Require new commercial development to provide for the construction of pedestrian rights of way to allow convenient and unimpeded circulation to, through, and within the property being developed.

- M-3.10: Require design measures as appropriate to accommodate access by pedestrians, bicycles, and transit within new development and to provide connections to adjacent development.

- M-3.11: When possible, enhance pedestrian accessibility by providing bulb-outs where appropriate in order to minimize pedestrian crossing distances and improve visibility.

- M-4.2: As feasible, ensure that new development of commercial and multi-family residential uses enhance the City's bicycle network and facilities.

- M-4.3: Where feasible, install bicycle amenities including parking, storage, dedicated bicycle lanes, and bicycle way-finding/signage along planned bicycle routes, throughout commercial areas, and at public facilities.

- M-5.8: Allow for the collection of fees from developers to undertake the following infrastructure projects to support new development: sidewalk improvements, landscaping, bicycle infrastructure, traffic calming devices, traffic signals, and other improvements that promote/maintain the pedestrian-oriented character of the community (i.e., traffic calming devices and Transportation Demand Management (TDM) programs).

- M-5.9: Require new development to pay its share of transportation improvements necessitated by that development.

- M-5.11: Ensure that emergency vehicles have secure and convenient access to the City's street network.

- M-6.2: Require new projects to provide an estimate of new trips generated and/or additional VMT. The degree of specificity required will be reasonably proportional to the project size.

- M-8.3: Encourage, promote, and allow shared and off-site parking arrangements in all commercial areas.

- M-8.7: Encourage shared parking and seek to create a program to pool shared public and private parking spaces in key commercial districts to help create "park once" environments.

- M-8.8: Consider requiring new commercial developments to place their parking spaces in shared parking pools.

- M-8.9: Require all new development to provide adequate parking whether on-site, off-site, through shared parking or park-once strategies, or other methods.

- M-8.14: Maintain demand-responsive pricing of all public on- and off-street parking in commercial corridors.

- M-8.15: Require private parking operators in commercial areas to post information about parking prices, time restrictions, and availability in a consistent manner for all commercial parking.

- M-8.16: Encourage building owners and/or managers of new multi-family and commercial buildings to make parking spaces available to qualified car-share operators, and to allow public access to the car-share vehicles.

- M-9.2: Work with businesses to provide commercial loading zones in the public right-of-way at a time and in a manner that balances the needs of businesses with the impact on traffic conditions.

- M-9.3: Utilize alleys for access to parking, delivery loading/unloading and trash collection and, where possible, provide additional green space and pedestrian amenities.

(5) West Hollywood Municipal Code (Parking)

The Project Site is subject to the Zoning Code, contained in Chapter 19 of the City of West Hollywood Municipal Code (WHMC) in regards to parking. WHMC Section 19.28.040, Table 3-6 establishes the minimum parking requirements by land use. The Zoning Code, in part, facilitates implementation of the objectives of the General Plan. The Zoning Code establishes residential and commercial zones and allowable land uses. It also provides design guidelines in designated zones and standards pertaining to site planning and general development. Standards established by the Zoning Code include minimum parking and circulation design guidelines. Please refer to Section IV.G, Land Use, for a detailed discussion of the applicable provisions of the WHMC that apply to the proposed Project.

b. Study Area

The study area (Study Area) for the proposed Project was established in consultation with the City, as well as comments received during the NOP/Scoping period, and by reviewing the existing intersection/corridor operations, the proposed Project's peak-hour vehicle trip generation, the anticipated distribution of the proposed Project's vehicular trips, and the potential impacts of the traffic, access and parking that would result from the proposed Project.

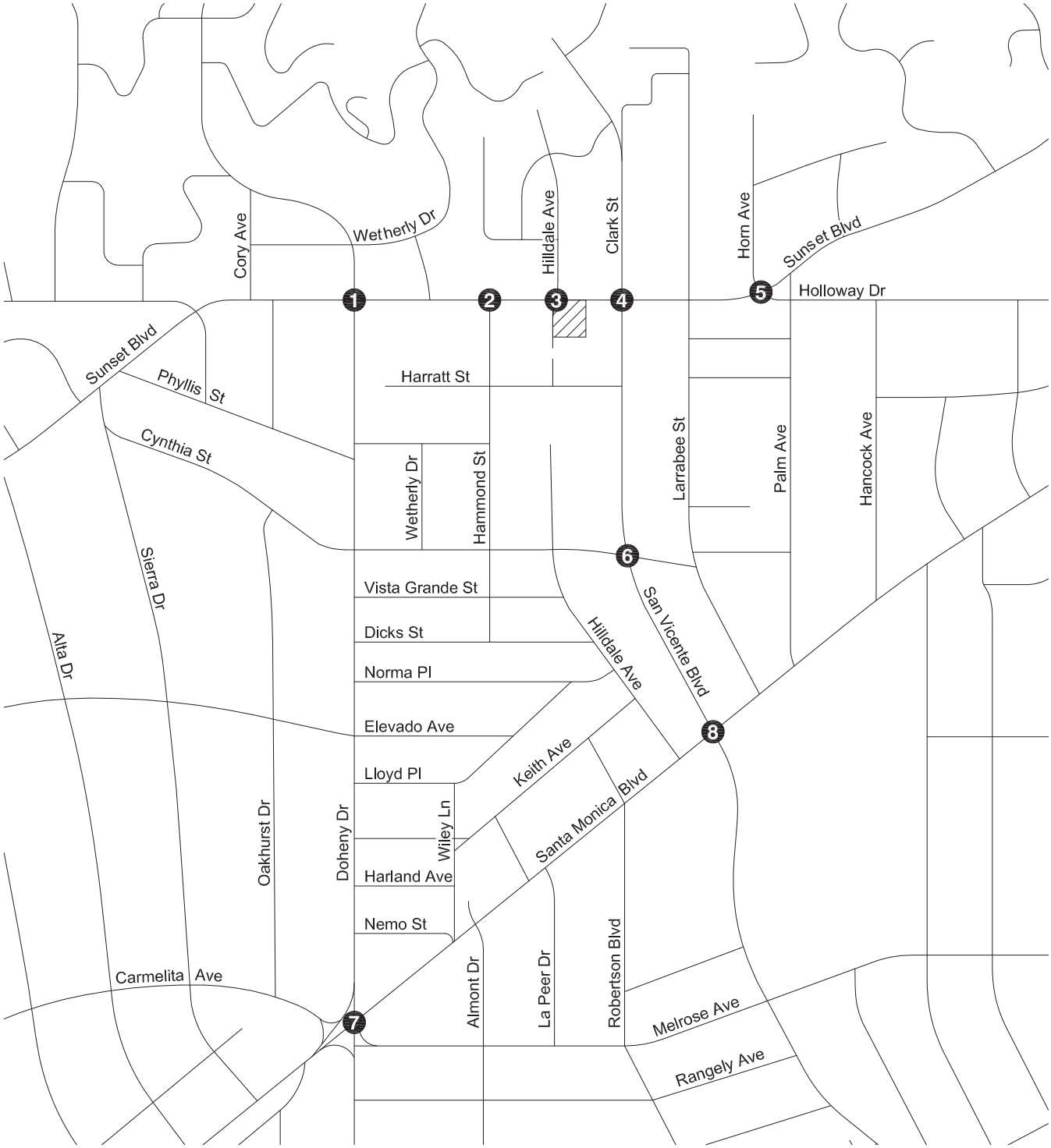
A traffic analysis Study Area generally comprises those locations with the greatest potential to experience significant traffic impacts due to a project, as defined by the lead agency. In the traffic engineering practice, a Study Area generally includes those intersections that are (1) immediately adjacent to or in close proximity to a project site; (2) in the vicinity of a project site that are documented to have current or projected future adverse operational issues; or (3) in the vicinity of a project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections). The Study Area for the proposed Project was designed to ensure that all potentially significantly impacted intersections, prior to any mitigation, were analyzed, and the boundary of the Study Area was extended, as necessary, to confirm that there were no significant impacts at or beyond the boundary of the Study Area by reviewing the proposed Project traffic's travel patterns.

The intersections selected for analysis are consistent with the above criteria. The study locations were also selected based on the proposed Project's vehicle trip generation, the anticipated distribution of the trips generated by the proposed Project, existing intersection/corridor operations, and travel routes/patterns to and from the proposed Project. Several additional study locations were considered but were not selected for analysis as they did not meet the criteria listed above, since they accommodated little, if any, Project-related traffic volumes/vehicular turning movements, were located distant from the Project Site, have relatively lower traffic volumes on the side streets and minor approach to the intersections, and have no documented existing or projected future adverse operational issues related to traffic impacts.

A total of eight intersections in the Study Area, seven signalized and one unsignalized, were identified during the scoping process for detailed analysis in the traffic study. Figure IV.J-1 on page IV.J-10 presents the location of the Project Site in relation to the surrounding street system and the eight study intersections, which are as follows:

1. Doheny Drive and Sunset Boulevard (signalized)

2. Hammond Street and Sunset Boulevard (signalized)



eyestone ENVIRONMENTAL

Figure IV.J-1
Study Area and Analyzed Locations

Source: Gibson Transportation Consulting, 2016.

3. Hilldale Avenue and Sunset Boulevard (unsignalized)
4. Clark Street/San Vicente Boulevard and Sunset Boulevard (signalized)
5. Horn Avenue/Holloway Drive and Sunset Boulevard (signalized)
6. San Vicente Boulevard and Cynthia Street (signalized)
7. Doheny Drive and Santa Monica Boulevard/Melrose Avenue (signalized)
8. San Vicente Boulevard and Santa Monica Boulevard (signalized)

c. Existing Street Systems

The existing street system in the Study Area, the boundaries of which are described further below, consists of a regional roadway system, including arterials, secondary/ collector, and local streets. The arterials, secondary/ collectors, and selected local streets in the Study Area offer sub-regional and local access and circulation opportunities. These transportation facilities generally provide two to four travel lanes and generally allow parking on either side of the street. Typically, the speed limits range between 25 and 35 miles per hour (mph) on the arterials, secondary/collector, and local streets.

The major arterials providing regional and sub-regional access to the Project Site include Sunset Boulevard, San Vicente Boulevard, and Santa Monica Boulevard. The street classifications were designated as defined in the General Plan. The following is a brief description of the major streets in the Study Area:

- Doheny Drive—Doheny Drive is a designated Collector Street that runs in the north-south direction and is located two blocks west of the Project Site. It provides local and sub-regional access to the Project Site, with two travel lanes, one in each direction, and left-turn lanes at intersections within the Study Area. Two-hour and four-hour metered parking with parking prohibited between 4:00 A.M. and 7:00 A.M. is generally provided north of Sunset Boulevard, and unmetered daytime parking (parking permits exempt) is available between Sunset Boulevard and Phyllis Avenue. Doheny Drive is under the shared jurisdiction of the Cities of West Hollywood and Beverly Hills south of Phyllis Avenue. Therefore, the parking restrictions on the east and west side of the street are enforced by the City of West Hollywood and the City of Beverly Hills, respectively. On the east side of the street, unmetered parking (with nighttime prohibitions, except by parking permit) is provided between Phyllis Avenue and Keith Street, unmetered parking is provided between Keith Street and Nemo Street, and metered two-hour daytime parking is generally available south of Nemo Street. On the west side of the street, unmetered one-hour and two-hour daytime parking with nighttime restrictions and permit exemptions is generally

available between Phyllis Avenue and Santa Monica Boulevard, and unmetered two-hour parking with peak-hour restrictions is available south of Santa Monica Boulevard.

- Hammond Street—Hammond Street is a designated Local Street that runs in the north-south direction and is located one block west of the Project Site. It provides two travel lanes, one in each direction, and local access to the Project Site. Travel along Hammond Street south of the Project Site to the adjacent neighborhood is restricted daily between 7:00 P.M. and 7:00 A.M., with posted signage and in-pavement bollards that are raised during nighttime hours. Unmetered two-hour parking with nighttime prohibitions, except by parking permit, is generally provided on the west side of the street north of Phyllis Avenue, and unmetered parking with nighttime prohibitions, except by parking permit, is generally provided on both sides of the street south of Phyllis Avenue.

- Hilldale Avenue—Hilldale Avenue is a designated Local Street that runs in the north-south direction and is located adjacent to the western boundary of the Project Site. It provides two travel lanes, one in each direction, and local access to the Project Site. Travel along Hilldale Avenue south of the Project Site is limited due to the installation of a physical barricade between Sunset Boulevard and Harratt Street that precludes travel between the neighborhood to the south and Sunset Boulevard. Metered two-hour daytime parking is provided adjacent to the Project Site and unmetered parking with nighttime prohibitions, except by parking permit, is generally provided on both sides of the street south of the Project Site within the Study Area.

- Clark Street—Clark Street is a designated Local Street that runs in the north-south direction and is located one block northeast of the Project Site. It provides two travel lanes, one in each direction, and local access to the Project Site. Unmetered angled parking with nighttime prohibitions, except by parking permit, is generally provided on the west side of the street within the Study Area.

- San Vicente Boulevard—San Vicente Boulevard is a designated Collector Street north of Santa Monica Boulevard and a designated Arterial Street south of Santa Monica Boulevard that runs in the northwest-southeast direction and is located one block east of the Project Site. It provides regional access to the Project Site with four travel lanes, two in each direction, and left-turns at intersections. Unmetered parking with nighttime prohibitions, except by parking permit, and metered one-hour and two-hour daytime parking is generally provided on both sides of the street within the Study Area.

- Horn Avenue—Horn Avenue is a designated Local Street that runs in the north-south direction and is located northeast of the Project Site. It provides two travel lanes, one in each direction, and local access to the Project Site. Unmetered two-hour parking with nighttime prohibitions, except by parking permit, is generally provided on the west side of the street within the Study Area.

- Holloway Drive—Holloway Drive is a designated Collector Street that runs in the east-west direction and is located east of the Project Site. It provides sub-regional access to the Project Site, with two travel lanes, one in each direction, and left-turns at intersections. Two-hour and four-hour metered parking, prohibited between 4:00 A.M. and 7:00 A.M., is generally provided on both sides of the street within the Study Area.

- Sunset Boulevard—Sunset Boulevard is a designated Arterial Street that runs in the east-west direction and is located adjacent to the northern boundary of the Project Site. It provides regional access to the Project Site, with four travel lanes, two in each direction, with left-turn lanes at intersections. Metered two-hour and four-hour parking, prohibited on weekdays between 4:00 A.M. and 7:00 A.M., is generally provided on both sides of the street within the Study Area.

- Harratt Street—Harratt Street is a designated Local Street that runs in the east-west direction and is located south of the Project Site. It provides two travel lanes, one in each direction. Unmetered parking with nighttime restrictions, except by parking permit, is generally provided on both sides of the street within the Study Area, with daytime school loading on the south side of the street adjacent to the nearby West Hollywood Elementary School.

- Cynthia Street—Cynthia Street is a designated Local Street that runs in the east-west direction and is located south of the Project Site. It provides two travel lanes, one in each direction, and local access to the Project Site. Unmetered parking with nighttime restrictions, except by parking permit, is generally provided on both sides of the street within the Study Area.

- Santa Monica Boulevard—Santa Monica Boulevard is a designated Arterial Street that runs in the northeast-southwest direction and is located south of the Project Site. It provides regional access to the Project Site, with four travel lanes, two in each direction, and left-turn lanes at intersections. Metered two-hour parking, prohibited on weekdays between 4:00 A.M. and 7:00 A.M., is generally provided on both sides of the street within the Study Area.

- Melrose Avenue—Melrose Avenue is a designated Collector Street that runs in the east-west direction and is located south of the Project Site. It provides sub-regional access to the Project Site, with two travel lanes, one in each direction, and left-turn lanes at intersections. Metered two-hour parking is generally provided on both sides of the street within the Study Area.

(1) Regional Transportation System

(a) Freeways

Primary regional access to the Project Site is provided by U.S. Highway 101 (US-101 or Hollywood Freeway), Interstate 10 (I-10 or Santa Monica Freeway), and

Interstate 405 (I-405 or San Diego Freeway). US-101 is located approximately 3.25 miles east of the Project Site, with access provided via an interchange at Highland Avenue. I-10 is located approximately 3.5 miles to the south of the Project Site, with access provided via interchanges at Robertson Boulevard and La Cienega Boulevard. I-405 is located approximately 4.5 miles to the west of the Project Site, with access provided via interchanges at Sunset Boulevard and Santa Monica Boulevard.

(b) Transit System

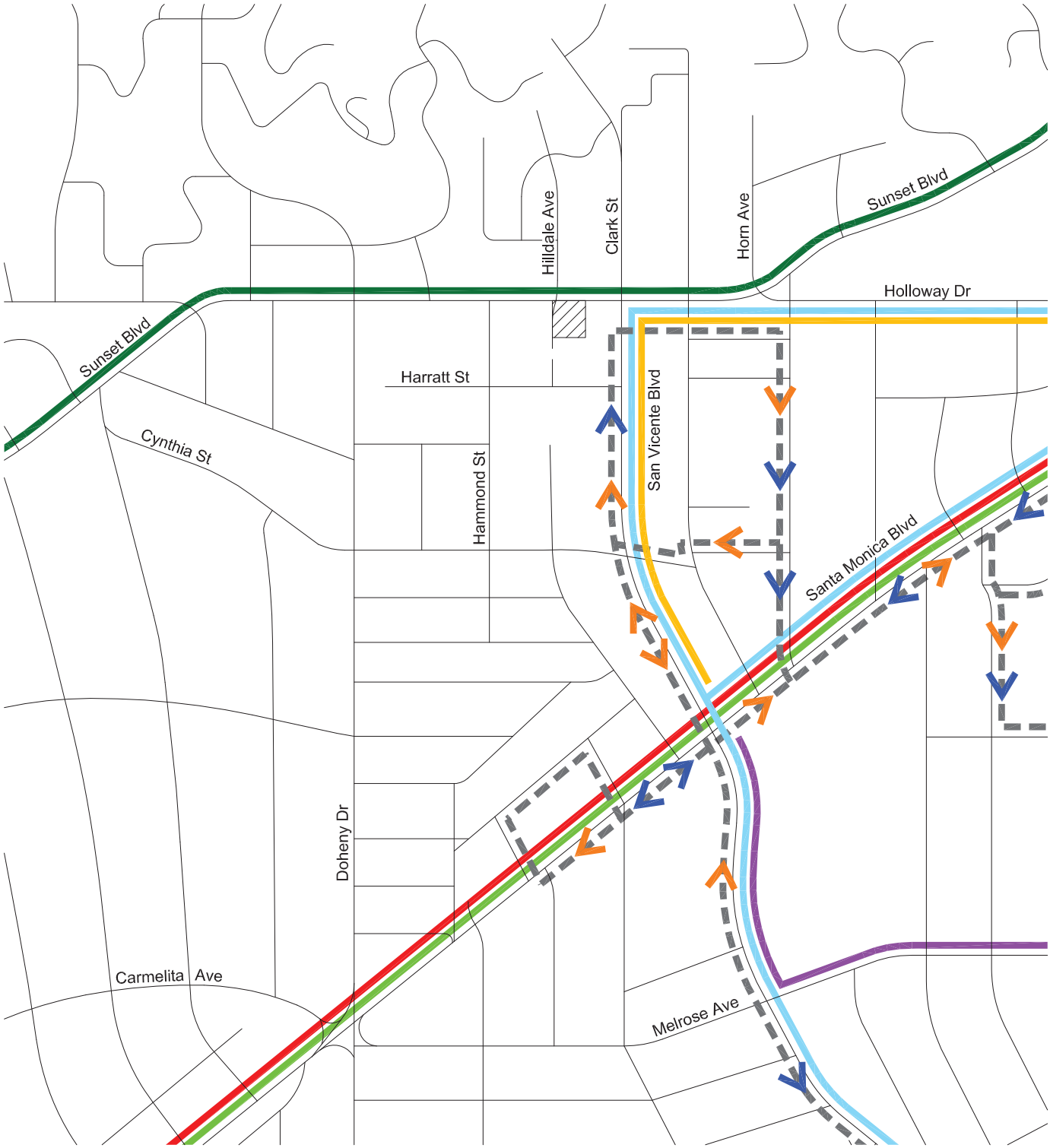
As explained above, the Study Area is well served by public transit and is located in an area defined as a "transit priority area" under SB 743. The Project Site area is served by bus lines operated by the Metro and the West Hollywood CityLine service. Bus transit service in the vicinity of the proposed Project is available along the following streets:

- Sunset Boulevard
- Santa Monica Boulevard
- San Vicente Boulevard
- Melrose Avenue

Figure IV.J-2 on page IV.J-15 identifies the existing transit service in the Study Area. Table IV.J-1 on page IV.J-16 summarizes the various transit lines operating in the Study Area for each of the service providers in the region, the type of service (peak vs. off-peak, express vs. local), and frequency of service. The average frequency of transit service during the peak hours was derived from the number of peak period stops made at the stop nearest the Project Site. The following provides a brief description of the bus lines providing service in the Project vicinity:

- Metro Local Line 2—Line 2 is a local line that travels from Downtown Los Angeles to Pacific Palisades via Sunset Boulevard, with average headways of approximately 10 to 15 minutes during the weekday A.M. and P.M. peak hours. This line provides service to Westwood, Beverly Hills, and Hollywood, and travels along Sunset Boulevard adjacent to the Project Site.

- Metro Local Line 4—Line 4 is a local line that travels from Downtown Los Angeles to Santa Monica via Santa Monica Boulevard, with average headways of approximately 10 to 15 minutes during the weekday A.M. and P.M. peak hours. This line provides service to West Los Angeles, West Hollywood, and Echo Park, and travels along Santa Monica Boulevard south of the Project Site.



eyestone ENVIRONMENTAL

Figure IV.J-2
Existing Transit Service

Source: Gibson Transportation Consulting, 2016.

Table IV.J-1
Existing Transit Service

Provider, Route, and Service Area		Service Type	Hours of Operation	Average Headway (minutes)			
				A.M. Peak Period		P.M. Peak Period	
				NB/EB	SB/WB	NB/EB	SB/WB
Metro							
2	Downtown Los Angeles–Pacific Palisades via Sunset Blvd.	Local	5:00 A.M.–2:00 A.M.	13	11	11	11
4	Downtown Los Angeles–West Los Angeles–Santa Monica via Santa Monica Blvd.	Local	24-Hour	11	12	11	12
10	Downtown Los Angeles–West Hollywood via Temple St. & Melrose Ave.	Local	4:00 A.M.–1:00 A.M.	13	11	24	18
30	West Hollywood–Downtown Los Angeles–Indiana Station via San Vicente Blvd., Pico Blvd. & E. First St.	Local	9:00 A.M.–4:30 A.M.	30	60	45	30
105	West Hollywood–Vernon via La Cienega Blvd. & Vernon Ave.	Local	4:00 A.M.–11:00 P.M.	24	18	18	20
302	Downtown Los Angeles–Westwood via Sunset Blvd.	Limited	6:00 A.M.–6:00 P.M.	N/A	9	12	N/A
330	West Hollywood–Downtown Los Angeles via San Vicente Blvd., Pico Blvd. & E. First St.	Limited	5:30 A.M.–7:00 P.M.	48	60	30	30
704	Downtown Los Angeles–Santa Monica Blvd. via Santa Monica Blvd.	Rapid	5:30 A.M.–1:00 A.M.	18	12	11	13
West Hollywood CityLine (City of West Hollywood Bus)							
Orange	Robertson Blvd. to La Brea Ave. (Eastbound)	Local	9:00 A.M.–6:00 P.M.	30	N/A	45	N/A
Blue	La Brea Ave. to Robertson Blvd, (Westbound)	Local	9:00 A.M.–6:00 P.M.	N/A	60	N/A	36

Metro: Los Angeles County Metropolitan Transportation Authority Bus
West Hollywood CityLine: City of West Hollywood Bus
A.M. peak from 6–10 A.M.
P.M. peak from 3–7 P.M.
Source: Gibson Transportation Consulting, Inc., 2017.

- Metro Local Line 10—Line 10 is a local line that travels from Downtown Los Angeles to West Hollywood via Temple Street and Melrose Avenue, with average headways of approximately 15 to 25 minutes during the weekday A.M. and P.M. peak hours. This line travels along Melrose Avenue south of the Project Site.

- Metro Local Line 30—Line 30 is a local line that travels from West Hollywood to the Metro Gold Line Indiana Station via San Vicente Boulevard, Pico Boulevard, and 1st Street, with average headways of approximately 30 to 60 minutes during the weekday A.M. and P.M. peak hours. The line provides service to Beverly Hills and Downtown Los Angeles and travels along San Vicente Boulevard east of the Project Site.

- Metro Local Line 105—Line 105 is a local line that travels from West Hollywood to Vernon via La Cienega Boulevard and Vernon Avenue, with average headways of approximately 20 to 25 minutes during the weekday A.M. and P.M. peak hours. This line provides service to Beverly Hills, Leimert Park, and Los Angeles, and travels along San Vicente Boulevard and Holloway Drive east of the Project Site.

- Metro Limited Line 302—Line 302 is a limited service line that travels from Echo Park to Westwood via Sunset Boulevard, with average headways of approximately 10 minutes in the westbound direction during the weekday A.M. peak hour and approximately 15 minutes in the eastbound direction during the weekday P.M. peak hour. This line provides service to Hollywood and Beverly Hills and travels along Sunset Boulevard adjacent to the Project Site.

- Metro Limited Line 330—Line 330 is a limited service line that travels from West Hollywood to Downtown Los Angeles, with average headways of approximately 30 to 60 minutes during the weekday A.M. and P.M. peak hours. This line provides service to Beverly Hills and the Metro Expo Line Pico/Rimpau Station and travels along San Vicente Boulevard east of the Project Site.

- Metro Rapid Line 704—Line 704 is a rapid line that travels from Downtown Los Angeles to Santa Monica, with average headways of approximately 10 to 20 minutes during the weekday A.M. and P.M. peak hours. This line provides service to West Los Angeles, West Hollywood, and Echo Park, and travels along Santa Monica Boulevard south of the Project Site.

- CityLine Blue Route—CityLine Blue Route travels north-south on San Vicente Boulevard in the vicinity of the Project Site, with average headways of 30 minutes during the A.M. and P.M. peak hours. The line serves the City.

- CityLine Orange Route—CityLine Orange Route travels north-south on San Vicente Boulevard in the vicinity of the Project Site, with average headways of 30 minutes during the A.M. and P.M. peak hours. The line serves the City.

Table IV.J-2 on page IV.J-19 summarizes the total residual capacity of the Metro and CityLine bus lines during the A.M. and P.M. peak hours based on the frequency of service of each line and the maximum seated and standing capacity of each bus line. As shown in Table IV.J-2, the bus lines within the Study Area currently have residual capacity for 1,411 transit trips during the A.M. peak hour and 1,365 transit trips during the P.M. peak hour.

(c) Congestion Management Program Facilities

The nearest arterial CMP monitoring stations to the Project Site include the following:

- Doheny Drive and Santa Monica Boulevard/Melrose Avenue (approximately 0.67 mile southwest of the Project Site)
- La Cienega Boulevard and Santa Monica Boulevard (approximately 0.60 mile east of the Project Site)
- La Cienega Boulevard and Wilshire Boulevard (approximately 1.85 miles southeast of the Project Site)

Various mainline freeway monitoring locations are located along I-10 and US-101, which are within 4.5 miles south and east of the Project Site, respectively. The CMP mainline freeway monitoring locations include the following:

- I-10 at Overland Avenue (Eastbound and Westbound)
- I-10 at La Brea Avenue (Eastbound and Westbound)
- US-101 south of Santa Monica Boulevard (Northbound and Southbound)

d. Project Site

As described in Section II, Project Description of this Draft EIR, the Project Site is currently developed with a 19,670-square-foot, two-story commercial building, a 2.5-level 32,000-square-foot subterranean parking structure, and 6,500 square feet of surface parking. Vehicular access to the Project Site is provided via a driveway located along Hilldale Avenue. A total of 106 spaces currently occupy the existing subterranean and surface parking.

Table IV.J-2
Existing Transit Service Patronage—Lines Serving Project Periphery

Provider	Route	Number of Runs During Peak Hour[a]	Capacity[b]	Maximum Load[c]	Load Factor—Maximum Load/Capacity	Residual Capacity per Run	Residual Capacity in Peak Hour[d]
A.M. Peak Period							
Metro	2–302	13	50	43	0.86	7	91
	4	10	50	28	0.56	22	220
	10	10	50	2	0.04	48	480
	30–330	4	50	3	0.06	47	188
	105	6	50	3	0.06	47	282
	704	9	75	52	0.69	23	207
WeHo CityLine	Blue–Orange	3	21	5	0.24	16	48
Total Residual Capacity in A.M. Peak Hour							**1,516**
P.M. Peak Period							
Metro	2–302	13	50	34	0.68	16	208
	4	10	50	30	0.60	20	200
	10	6	50	3	0.06	47	282
	30–330	3	50	2	0.04	48	144
	105	6	50	6	0.12	44	264
	704	10	75	50	0.67	25	250
WeHo CityLine	Blue–Orange	12	21	5	0.24	16	192
Total Residual Capacity in P.M. Peak Hour							**1,540**

Metro: Los Angeles County Metropolitan Transportation Authority Bus
WeHo CityLine: City of West Hollywood Bus
[a] *Number of runs in both directions combined during peak hour.*
[b] *Capacity assumptions based on discussions with [Metro and West Hollywood CityLine]:*
Metro Regular Bus—40 seated/50 seated and standing.

Table IV.J-2 (Continued)
Existing Transit Service Patronage—Lines Serving Project Periphery

Provider	Route	Number of Runs During Peak Hour[a]	Capacity[b]	Maximum Load[c]	Load Factor—Maximum Load/Capacity	Residual Capacity per Run	Residual Capacity in Peak Hour[d]

Metro Articulated Bus—66 seated/75 seated and standing.

West Hollywood CityLine Bus—21 seated only.

[c] *Maximum Load is the maximum number of people per bus in the peak direction based on available ridership data provided by Metro for year 2016.*

[d] *Maximum residual capacity in peak hours = (Maximum residual capacity per run) x (number of peak-hour runs).*

Source: Gibson Transportation Consulting, Inc., 2017.

The area surrounding the Project Site includes a mature network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features. Adjacent to the Project Site, sidewalks are available on Sunset Boulevard and Hilldale Avenue. Pedestrian access to the existing uses on the Project Site is provided via Sunset Boulevard.

The City has a limited bicycle network. There are only 5.5 miles of existing bike lanes in the City, on 43.69 miles of roadway, although a number of low-traffic residential streets also accommodate bicycle travel and connect portions of the bike lane network.[6] The nearest designated bicycle route is on San Vicente Boulevard between Sunset Boulevard and Santa Monica Boulevard. One bicycle rack is currently located in front of the Project Site on Sunset Boulevard.

3. Existing Conditions

a. Existing Traffic Volumes and Levels of Service

This section describes the methodology used to assess the traffic conditions at each intersection, presents the existing peak-hour traffic volumes for the eight study intersections identified above, and analyzes the resulting operating conditions at each intersection using delay and level of service (LOS).

(1) Methodology

Intersection turning movement counts during the typical weekday morning (7:00 A.M. to 9:00 A.M.) and afternoon (4:00 P.M. to 6:00 P.M.) commuter peak periods were conducted at the eight study intersections in March 2015. Local schools were in session at the time the traffic counts were conducted. The City of West Hollywood allows for the utilization of traffic count data within two years of the NOP date, as the City has determined that traffic volumes and patterns remain generally consistent within a two-year period if no significant changes (e.g., roadway improvements, construction activities, etc.) have occurred. In an effort to provide a conservative analysis, an ambient traffic growth rate of one (1) percent was applied to the traffic counts to reflect regional growth and development between year 2015 and 2016, so the traffic counts presented below represent conditions at the issuance of the proposed Project's NOP in April 2016.

In accordance with City policy, the traffic data were analyzed based on the 2010 Highway Capacity Manual (HCM) signalized and unsignalized methodologies. The HCM

---

[6] *City of West Hollywood, Final Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan, October 2010.*

signalized methodology calculates the average delay, in seconds, for each vehicle passing through the intersection, while the HCM unsignalized methodology calculates the control delay, in seconds for the movement with the worst LOS at each intersection. Table IV.J-3 below presents a description of the LOS categories, which range from excellent, nearly free-flow traffic at LOS A to stop-and-go conditions at LOS F, for both signalized and unsignalized intersections.

(2) Existing Intersection Levels of Service

Table IV.J-4 on page IV.J-23 summarizes the existing weekday A.M. and P.M. peak-hour delay and the corresponding LOS for each of the study intersections. Based on observations of existing operations along Sunset Boulevard, it is recognized that the HCM methodology does not in every case account for vehicle queues, pedestrian conflicts, and other impediments to traffic flow. Thus, the calculated average operating conditions may appear better than is observed in the field. Therefore, the LOS presented below for two of the eight study intersections located along Sunset Boulevard reflect observed conditions and provide a worst-case analysis of Project impacts.

Table IV.J-3
Level of Service Definitions for Signalized and Unsignalized Intersections

Level of Service	Signalized Intersection Delay (sec)	Unsignalized Intersection Delay (sec)	Definition
A	0.0–10.0	0.0–10.0	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	10.1–20.0	10.1–15.0	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	20.1–35.0	15.1–25.0	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	35.1–55.0	25.1–35.0	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	55.1–80.0	35.1–50.0	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 80.0	> 50.0	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Transportation Research Board, Highway Capacity Manual 2000, 2000.

As illustrated in Table IV.J-4 below, five of the eight study intersections operate at LOS D or better during both the A.M. and P.M. peak hours under existing conditions.

Table IV.J-4
Existing Conditions (Year 2016)—Intersection Peak-Hour Levels of Service

No.	Intersection	Peak Hour	Existing Conditions	
			Delay (sec)	LOS
1.	Doheny Dr. & Sunset Blvd.	A.M.	27.4	F*
		P.M.	45.4	F*
2.	Hammond St. & Sunset Blvd.	A.M.	11.6	B
		P.M.	10.1	B
3.[a]	Hilldale Ave. & Sunset Blvd.	A.M.	0.3	A
		P.M.	0.3	A
4.	Clark St./San Vicente Blvd. & Sunset Blvd.	A.M.	17.5	F*
		P.M.	16.7	F*
5.	Horn Ave./Holloway Dr. & Sunset Blvd.	A.M.	24.2	C
		P.M.	21.0	C
6.	San Vicente Blvd. & Cynthia St.	A.M.	16.3	B
		P.M.	22.7	C
7.	Doheny Dr. & Santa Monica Blvd./Melrose Ave.	A.M.	159.7	F
		P.M.	172.8	F
8.	San Vicente Blvd. & Santa Monica Blvd.	A.M.	37.1	D
		P.M.	41.6	D

**LOS for commercial corridor intersections along Sunset Boulevard based on field observations, as the calculated delay for individual intersections does not, in every case, account for vehicular queues along corridors, pedestrian conflicts, etc., and, thus, the calculated average operating conditions may appear better than is observed. Therefore, for purposes of determining impacts, the worst case LOS assumed to be LOS F.*

[a] *Intersection is unsignalized.*

Source: Gibson Transportation Consulting, Inc., 2017.

4. Future Conditions

a. Future without Project Conditions

In accordance with CEQA requirements, the Traffic Study considers the effect of the proposed Project in relation to other developments either proposed, approved, or under construction in the Study Area. The Future without Project traffic projections presented below reflect growth in traffic over Existing Conditions from two sources. The first source is

the ambient growth in traffic, which reflects increases in traffic due to regional growth and development outside the Study Area, and the second source is growth due to traffic generated by projects proposed, approved, or under construction within and in the vicinity of the Study Area. These projects are collectively known as the related projects.

(1) Ambient Traffic Growth

Existing traffic is expected to increase over time as a result of employment, housing, and regional growth and development. Based on historic trends, an annual ambient traffic growth factor of one (1) percent per year was assumed as a conservative estimate to adjust the Existing Conditions (Year 2016) traffic volumes to reflect the effects of regional growth and development by the year 2020 (the proposed Project's buildout year). Therefore, the total adjustment applied over the four-year period between the issuance of the Notice of Preparation for the proposed Project and its expected buildout year in 2020 was four (4) percent.

(2) Related Projects

The Traffic Study also considered the effects of the proposed Project in relation to other developments either proposed, approved, or under construction in the Study Area and expected to be implemented prior to the buildout date of the proposed Project (2020). Although the buildout years of many of these related projects are uncertain and may be well beyond the buildout year of the proposed Project, and notwithstanding that some may never be approved or developed, they were all considered and conservatively assumed to be completed by the proposed Project's buildout year (2020). The traffic projections of the related projects are also very conservative in that they do not in every case account for either the trips generated by the existing uses to be removed or the likely use of other travel modes (transit, bicycle, walk, etc.). Information about the related projects was obtained from the Cities of West Hollywood, Beverly Hills, and Los Angeles, as well as from recent published reports for other developments. A complete list of the related projects is available in Section III, Environmental Setting, of this Draft EIR.

(3) Future without Project Levels of Service

Table IV.J-5 on page IV.J-25 summarizes the Future without Project weekday A.M. and P.M. peak-hour delay and the corresponding LOS for each of the study intersections. As shown therein, four of the eight study intersections are projected to operate at LOS D or better during both the A.M. and P.M. peak hours. The remaining four intersections are projected to operate at LOS F during both of the analyzed peak hours.

Table IV.J-5
Future Without Project Conditions (Year 2020)—Intersection Peak-Hour Levels of Service

No.	Intersection	Peak Hour	Future without Project	
			Delay (sec)	LOS
1.	Doheny Dr. & Sunset Blvd.	A.M.	33.2	F*
		P.M.	42.8	F*
2.	Hammond St. & Sunset Blvd.	A.M.	27.7	C
		P.M.	17.4	B
3.[a]	Hilldale Ave. & Sunset Blvd.	A.M.	0.7	A
		P.M.	0.8	A
4.	Clark St./San Vicente Blvd. & Sunset Blvd.	A.M.	22.7	F*
		P.M.	24.0	F*
5.	Horn Ave./Holloway Dr. & Sunset Blvd.	A.M.	28.5	C
		P.M.	24.8	C
6.	San Vicente Blvd. & Cynthia St.	A.M.	15.6	B
		P.M.	36.3	D
7.	Doheny Dr. & Santa Monica Blvd./Melrose Ave.	A.M.	139.3	F
		P.M.	164.6	F
8.	San Vicente Blvd. & Santa Monica Blvd.	A.M.	85.0	F
		P.M.	84.4	F

**LOS for commercial corridor intersections along Sunset Boulevard based on field observations, as the calculated delay for individual intersections does not, in every case, account for vehicular queues along corridors, pedestrian conflicts, etc., and, thus, the calculated average operating conditions may appear better than is observed. Therefore, for purposes of determining impacts, the worst case LOS assumed to be LOS F.*

[a] *Intersection is unsignalized.*

Source: Gibson Transportation Consulting, Inc., 2017.

5. Project Impacts

a. Methodology

The proposed Project's Traffic Study was prepared in accordance with City guidelines, adopted policies, procedures, and standards, and provides a comprehensive analysis of the potential traffic impacts associated with the proposed Project. The scope for the Traffic Study was developed in consultation with the City, and in consideration of input received during the public scoping process from adjacent jurisdictions (e.g., City of Beverly Hills and City of Los Angeles) and community stakeholders (e.g., local businesses

and residents). The assumptions and technical methodologies were identified as part of the study approach, which was reviewed and approved by the City.

The Traffic Study analyzed the potential Project-generated traffic impacts on the street system surrounding the Project Site as compared to Existing Conditions (Year 2016) and Future Conditions (Year 2020), which are discussed above. Traffic impacts at the eight identified study intersections were evaluated for typical weekday A.M. and P.M. peak periods. The analysis of future year traffic conditions was conducted for full buildout of the proposed Project and is based on projected conditions in year 2020 both without and with the addition of the proposed Project's traffic. As noted above, the HCM signalized and unsignalized methodology was used to calculate the LOS at each of the study intersections.

With respect to trip generation, the typical resource used is the Institute of Transportation Engineers' (ITE), *Trip Generation Manual, 9th Edition*, (*Trip Generation*) which provides trip-generation rates for a wide variety of land uses based on surveys across the nation. However the use and operational characteristics of the private member-only uses of the proposed Project are not directly applicable to conventional trip-generation estimates based on the land use categories provided in ITE's *Trip Generation*. Therefore, consistent with the recommendation in *Trip Generation* for land uses that are not represented by the land use classifications, trip-generation rates for the private members-only uses included in the proposed Project were conservatively developed based on site-specific empirical data collected from membership attendance and employee requirements for Arts Club London and the anticipated unique operational characteristics of the proposed Project (i.e., the proposed Project's land use components, membership levels, anticipated member/guest and employee arrival and departure patterns, events, and other programming). A detailed discussion of the assumptions, methodology, and data employed for this analysis is included in the proposed Project's Traffic Study, shown in Appendix H of this Draft EIR. For the proposed Project's publicly accessible commercial uses, the published rates from *Trip Generation* were utilized to estimate the trips generated.

An analysis was also conducted according to Los Angeles County CMP guidelines. The CMP requires that a Traffic Impact Analysis be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the A.M. or P.M. peak hours and all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the A.M. or afternoon P.M. peak hours. Additionally, it requires a review of impacts to the regional transit system.

In addition, Section B.8.4 of the CMP provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the number of

vehicle trips. This methodology assumes an average vehicle occupancy (AVO) factor of 1.4 in order to estimate the number of person trips to and from the proposed Project and to provide guidance regarding the percentage of Project person trips that may use public transit to travel to and from the Project Site depending on the mix of uses and proximity to transit. Furthermore, a 10-percent to 15-percent transit/walk-in adjustment was applied to account for the use of non-auto travel modes (e.g., rail, light-rail, bus, bicycle, walk, etc.). For the purposes of the analysis, all transit/walk-in trip estimates were conservatively assumed to travel via public transit.

Furthermore, the shared parking demand analysis in the Traffic Study provides a methodology used to determine the parking supply needed to accommodate the peak parking demand of the proposed Project. Based on computer modeling and average parking rates developed and updated by the Urban Land Institute and the International Council of Shopping Centers, this methodology measures the peak demand for every land use within a mixed-use development. Parking demand of the proposed Project was prepared and calibrated to the anticipated development operations within the Arts Club, and estimated based on empirical data from the Arts Club London. Similar to the proposed Project's trip-generation assumptions, parking occupancy patterns were based on the anticipated arrival and departure patterns of members/guests and employees, length of stay, hours of operation, membership projections, etc. Specifically, the shared parking model relied on key factors, such as parking demand ratios, time of day, weekday/weekend conditions, travel mode split and captive market, seasonal variation, and auto occupancy. In addition, the parking demand model highlights the change in parking demand patterns throughout the day for both weekday and weekend conditions.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to transportation and traffic. Therefore, in the context of these questions from the CEQA Guidelines, a significant impact related to traffic would occur if the proposed Project would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

- Conflict with an applicable congestion management program including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.
- Result in inadequate parking capacity.
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Appendix G to the CEQA Guidelines does not include a sample threshold of significance for parking impacts. The prior checklist question under the CEQA Guidelines regarding inadequate parking capacity was deleted in 2010. However, as discussed in Subsection 2.a.(1) above, SB 743 adds Public Resources Code Section 21099, which provides that parking impacts associated with employment center projects on infill sites are not considered significant. Therefore, the analysis regarding parking impacts with respect to the proposed Project is provided for informational purposes only.

The City has adopted a sliding scale for determining significant traffic impacts to intersections. The following table contains the City's significant impact criteria are based on a minimum allowable increase in delay attributable to a project as the overall LOS of the intersection decreases.

Intersection Conditions with Project Traffic		**Project-Related Increase of Delay (seconds)**
Level of Service	**Intersection Delay (seconds)**	
Signalized Intersection of Two Commercial Corridors		
D	35.1–55.0	≥ 12.0
E or F	> 55.0	≥ 8.0
Other Signalized Intersection		
D	35.1–55.0	≥ 8.0
E or F	> 55.0	≥ 5.0
Four-Way Stop-Controlled Intersection		
D	25.1–35.0	≥ 8.0
E or F	> 35.0	≥ 5.0

Intersection Conditions with Project Traffic		Project-Related Increase of Delay (seconds)
Level of Service	Intersection Delay (seconds)	
Unsignalized (Two-Way/One-Way Stop-Controlled) Intersection		
D, E or F	> 25.0	≥ 5.0

Source: City of West Hollywood Community Development Department, Traffic Study Thresholds, October 2009

In addition, the CMP analysis uses the Intersection Capacity Utilization (ICU) methodology to determine intersection volume-to-capacity (V/C) ratio, which is used to determine the intersection LOS. A significant impact requiring mitigation occurs if Project traffic causes an incremental increase in intersection V/C ratio of 0.02 or greater to a facility projected to operate at LOS F (V/C > 1.00) after the addition of Project traffic. The CMP analysis also uses a demand-to-capacity (D/C) ratio to determine facility LOS based on capacity identified in Appendix A of the CMP. Similar to arterial monitoring intersections, a significant impact requiring mitigation occurs if Project traffic causes an incremental increase in D/C ratio of 0.02 or greater to a mainline freeway monitoring location projected to operate at LOS F (D/C > 1.00) after the addition of Project traffic.

With respect to air traffic, as discussed in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, while the proposed Project includes development of an emergency helipad on its roof, design of the helipad would be subject to the review and approval by the City Building and Safety Division, and the Los Angeles County Fire Department. Adherence to all design requirements and review and approval by the City and the County would ensure operation of the helipad in the event of an emergency would not pose a threat to the public. Impacts would be less than significant, and no further discussion is required.

As evaluated in Section VII, Effects Found Not to Be Significant, of this Draft EIR, the proposed Project's design does not include hazardous features. The roadways adjacent to the Project Site also do not contain any sharp curves or dangerous intersections, and the development of the proposed Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. No impacts would occur and no further discussion is required.

c. Project Design Features

The following project design features are proposed with respect to traffic, access, and parking:

Project Design Feature J-1: A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The Construction Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Prohibition of construction worker parking on adjacent residential streets.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Construction-related vehicles shall not park on surrounding Sunset Boulevard, unless a temporary encroachment permit is approved by the City for such parking.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.

Project Design Feature J-2: A Parking Management Plan will be developed and submitted to the City for review and approval. The Parking Management Plan will minimize potential parking impacts by implementing components, such as parking and traffic management measures (e.g., directional signage, operation/scheduling measures, etc.) and other traffic demand management tools and strategies.

d. Analysis of Project Impacts

(1) Construction

The construction impact analysis relates to the temporary impacts that may result from construction of the proposed Project, including safety, operational, or capacity impacts. This analysis was performed in accordance with City guidelines.

The proposed Project is anticipated to be constructed over a period of up to approximately 32 months, with construction commencing during late 2017 or early 2018 and completion anticipated in the year 2020. The construction period would include subphases of site demolition, grading, foundation, building construction, and paving/landscape. Peak haul activity occurs during site demolition and grading, and peak worker activity occurs during building construction. These two subphases of construction are discussed further below.

(a) Site Demolition and Grading Phase

The peak period of truck activity during construction would occur during demolition and grading of the Project Site. Approximately 48,000 cubic yards (cy) of material would be excavated and removed from the Project Site over a maximum potential 16-week period, equating to approximately 600 cy of material exported per day. This would require 43 haul trucks per work day based on an anticipated haul truck capacity of 14 cy per truck. Therefore, up to 86 daily truck trips (43 inbound, 43 outbound) are expected to occur during this phase, with approximately 10 trips per hour (five inbound, five outbound) uniformly over a typical 8-hour workday.

Haul trucks would travel on approved truck routes designated within the City and would take the most direct route to the appropriate freeways. Trucks departing the Project Site would travel eastbound on Sunset Boulevard then southbound on La Cienega Boulevard to access I-10. Trucks arriving to the Project Site would travel northbound on La Cienega Boulevard from I-10, then westbound on Sunset Boulevard, or northbound on Doheny Drive, then eastbound on Sunset Boulevard. Hilldale Avenue would be utilized to stage haul trucks arriving to the Project Site. The proposed truck haul routes will be reviewed and approved by the City and identified within the Construction Management Plan.

In addition, during this period a maximum of 20 construction workers is anticipated on the Project Site. Assuming minimal carpooling among these workers, an average vehicle occupancy (AVO) of 1.135 persons per vehicle was applied to account for carpooling, as provided in SCAQMD's *CEQA Air Quality Handbook*. Therefore, 20 construction workers would result in a total of 18 vehicle trips to and from the Project Site on a daily basis.

With implementation of the Construction Management Plan included as Project Design Feature J-1, it is anticipated that almost all haul truck activity to and from the Project Site would occur outside of the A.M. and P.M. peak hours. In addition, worker trips to and from the Project Site would also occur outside of the peak hours. Therefore, no

peak-hour construction traffic impacts are expected during the excavation and grading phase of construction.

(b) Building Construction Phase

Traffic impacts associated with construction workers depends on the number of workers employed during various phases of construction, as well as the travel mode and travel time of the workers. In general, the hours of construction typically require workers to be on-site before the weekday commuter peak period and allow them to leave before or after the afternoon commuter peak period (i.e., arrive at the site prior to 7:00 A.M. and depart before 4:00 P.M. or after 6:00 P.M.). Therefore, most, if not all construction worker trips would occur outside of the typical weekday commuter peak periods.

According to construction projections prepared for the proposed Project, the building subphase of construction would employ up to 40 workers per day for all components of the building (i.e., framing, plumbing, elevators, inspections, finishing). However, since the different building components would not be constructed or installed simultaneously, this cumulative estimate overstates the number of workers that would be expected on the peak construction day. Furthermore, on most of the estimated workdays to complete the proposed Project, there would be far fewer workers than on the peak day. Therefore, the estimate of 40 workers per day used for the purposes of this analysis conservatively represents a higher-than-expected estimate.

Assuming an AVO of 1.135 using the SCAQMD methodology discussed above, 40 workers would result in a total of 35 vehicles that would arrive and depart from the proposed Project Site each day. The estimated number of daily trips associated with the construction workers is approximately 70 (35 inbound and 35 outbound trips), but nearly all of those trips would occur outside of the peak hours, as described above. As such, the building phase of Project construction is not expected to cause a significant traffic impact at any of the study intersections.

During construction, adequate parking for construction workers would be secured in the vicinity of the Project Site, at an appropriate location identified within the proposed Project's Construction Management Plan approved by the City. Restrictions against workers parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site would be required as part of the Construction Management Plan, included as Project Design Feature J-1. Construction parking may require the temporary use of off-site parking areas for materials storage and truck staging.

(c) Impacts to Access, Transit, and Parking

Construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. Adjacent to the Project Site, the curb lanes on Sunset Boulevard and Hilldale Avenue would be used intermittently throughout the construction period for equipment staging, concrete pumping, etc. Temporary traffic controls and/or flag men would be provided to direct traffic around any closures as required in the Construction Management Plan, included as Project Design Feature J-1. As shown, in Table IV.J-6 on page IV.J-34, lane closures would not result in a temporary significant impact at the intersection of Hilldale Avenue and Sunset Boulevard.

The use of the public right-of-way along Sunset Boulevard and Hilldale Avenue would require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed. The Construction Management Plan included as Project Design Feature J-1 would contain measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering).

There are no bus stops adjacent to the Project Site, and therefore, no temporary impacts to transit are expected. General public parking is allowed on both Sunset Boulevard and Hilldale Avenue (during certain hours of the day) adjacent to the Project Site; consequently, the installation of construction fences could result in the temporary loss of up to four on-street metered parking spaces on Sunset Boulevard and up to three on-street metered parking spaces on Hilldale Avenue.

Construction of the proposed Project is not expected to create hazards for roadway travelers, bus riders, or people utilizing on-street parking spaces, so long as commonly practiced safety procedures for construction are followed, such as temporary traffic controls during all construction activities (e.g., flag men), alternate routing, and protection barriers. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) will be incorporated into the Construction Management Plan, which will be approved by the City as set forth in Project Design Feature J-1. Construction-related impacts associated with access and transit would be less than significant, and the implementation of Project Design Feature J-1 would further reduce those impacts.

Table IV.J-6
Existing With Construction Conditions (Year 2016)—Significant Impact Analysis

No.	Intersection	Peak Hour	Existing		Existing with Construction			
			Delay (sec)	LOS	Delay (sec)	LOS	Change in Delay (sec)	Impact
3.[a]	Hilldale Ave. & Sunset Blvd.	A.M.	0.3	A	0.8	A	0.5	No
		P.M.	0.3	A	1.2	A	0.9	No

[a] *Intersection is unsignalized.*
Source: Gibson Transportation Consulting, Inc., 2017.

(2) Operation

(a) Project Trip Generation and Distribution

As discussed above, the proposed Project's trip-generation forecasts were derived based on empirical data from the Arts Club London for the proposed Project's members-only uses and published rates from *Trip Generation* for the proposed Project's publicly accessible commercial uses. As shown in Table IV.J-7 on page IV.J-35, when accounting for the removal of the existing uses on the Project Site, the proposed Project is anticipated to generate a net of 1,961 daily trips, including 122 trips during the A.M. peak hour (103 inbound, 19 outbound) and 159 trips during the P.M. peak hour (68 inbound, 91 outbound). Project traffic was assigned to the surrounding street system based on the following general distribution pattern, which was reviewed and approved by the City:

- 30 percent assigned to/from the east (Sunset Boulevard/Holloway Drive)
- 30 percent assigned to/from the south (San Vicente Boulevard/Doheny Drive)
- 40 percent assigned to/from the west (Sunset Boulevard/Santa Monica Boulevard)

(b) Existing Plus Project Conditions

As previously discussed, the analysis of Existing Plus Project Conditions evaluates potential Project-related traffic impacts as compared to existing conditions during the typical weekday A.M. and P.M. peak periods. As shown in Table IV.J-8 on page IV.J-38, under Existing Plus Project conditions, five of the eight study intersections are projected to operate at LOS D or better during both the A.M. and P.M. peak hours. The remaining three intersections are projected to operate at LOS F during both of the analyzed peak hours. However, as also shown in Table IV.J-8, the incremental increase in delay with the addition

Table IV.J-7
Trip Generation

Land Use	Size	Daily	A.M. Peak Hour			P.M. Peak Hour		
			In	Out	Total	In	Out	Total
Trip-Generation Rates								
Arts Club Member-Only Uses[a]								
Members/Guests	per member[b]	0.20	73%	27%	0.01	52%	48%	0.01
Employees	per member[c]	0.09	86%	14%	0.01	59%	41%	0.01
Uses Open to the Public[d]								
Museum (ITE 580)	per 1,000 sf	N/A	86%	14%	0.28	16%	84%	0.18
Office (ITE 710)	per 1,000 sf	11.03	88%	12%	1.56	17%	83%	1.49
Specialty Retail (ITE 826)[e]	per 1,000 sf	44.32	60%	40%	1.20	44%	56%	2.71
Existing Uses to be Removed								
Health Club/Fitness Club (ITE 492)	per 1,000 sf	32.93	50%	50%	1.41	57%	43%	3.53
Office (ITE 710)	per 1,000 sf	11.03	88%	12%	1.56	17%	83%	1.49
Specialty Retail (ITE 826)[e]	per 1,000 sf	44.32	60%	40%	1.20	44%	56%	2.71
Proposed Project								
Arts Club Member-Only Uses								
Members/Guests	7,000 members[f]	1,428	31	11	42	44	40	84
Less 10-Percent Non-Auto Modes[g]		*(143)*	*(3)*	*(1)*	*(4)*	*(4)*	*(4)*	*(8)*
Employees	7,000 members[f]	651	36	6	42	37	26	63
Less 15-Percent Non-Auto Modes[g]		*(98)*	*(5)*	*(1)*	*(6)*	*(6)*	*(4)*	*(10)*
Subtotal Arts Club Member-Only Uses		*1,838*	*59*	*15*	*74*	*71*	*58*	*129*
Uses Open to the Public								
Museum (ITE 580)[h]	2,192 sf	N/A	1	0	1	0	0	0
Less 50-Percent Internal Capture[i]		*N/A*	*(1)*	*0*	*(1)*	*0*	*0*	*0*
Creative Office[j]	46,009 sf	507	63	9	72	12	57	69
Less 15-Percent Non-Auto Modes[g]		*(76)*	*(9)*	*(1)*	*(10)*	*(2)*	*(9)*	*(11)*

Table IV.J-7 (Continued)
Trip Generation

Land Use	Size	Daily	A.M. Peak Hour			P.M. Peak Hour		
			In	Out	Total	In	Out	Total
Specialty Retail	11,933 sf	529	8	6	14	14	18	32
Less 50-Percent Internal Capture[i]		*(265)*	*(4)*	*(3)*	*(7)*	*(7)*	*(9)*	*(16)*
Less 15-Percent Non-Auto Modes[g]		*(40)*	*(1)*	*0*	*(1)*	*(1)*	*(1)*	*(2)*
Subtotal Uses Open to the Public		*655*	*57*	*11*	*68*	*16*	*56*	*72*
Total Proposed Project Trips		**2,493**	**116**	**26**	**142**	**87**	**114**	**201**
Existing Uses to Be Removed								
Health Club/Fitness Club	5,250 sf	173	4	3	7	11	8	19
Less 15-Percent Non-Auto Modes[g]		*(26)*	*(1)*	*0*	*(1)*	*(2)*	*(1)*	*(3)*
Office	4,000 sf	44	5	1	6	1	5	6
Less 15-Percent Non-Auto Modes[g]		*(7)*	*(1)*	*0*	*(1)*	*0*	*(1)*	*(1)*
Specialty Retail	9,250 sf	410	7	4	11	11	14	25
Less 15-Percent Non-Auto Modes[g]		*(62)*	*(1)*	*(1)*	*(2)*	*(2)*	*(2)*	*(4)*
Total Existing Uses to Be Removed		**532**	**13**	**7**	**20**	**19**	**23**	**42**
Total Net New Project Trips		**1,961**	**103**	**19**	**122**	**68**	**91**	**159**

sf = square feet

[a] *Empirical visitor trip-generation rates developed for the member/guest-only uses of the Arts Club were developed based on member in/out person data for typical conditions at Arts Club London in February 2016. The data accurately represent the general member/guest activity at Arts Club London. Empirical employee trip-generation rates were developed based on employee projections for Arts Club West Hollywood provided by LLG Engineers.*

[b] *Empirical visitor trip-generation rate based on total Arts Club West Hollywood membership.*

[c] *Empirical employee trip-generation rate based on the projected number of employees needed to service the anticipated Arts Club West Hollywood membership level.*

[d] *Trip-generation rates from Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012) would be applied to the land uses open to the public.*

[e] *A.M. rate for specialty retail from (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (SANDAG, 2002), as no A.M. rate is available in Trip Generation.*

[f] *Arts Club West Hollywood would have a maximum of 7,000 members.*

Table IV.J-7 (Continued)
Trip Generation

Land Use	Size	Daily	A.M. Peak Hour			P.M. Peak Hour		
			In	Out	Total	In	Out	Total
[g] *Based on recent studies and discussions with City of West Hollywood staff, as well as the Project Site's proximity to transit stops and the increasing utilization of rideshare programs, a reduction was applied to account for trips made via non-auto travel modes (e.g., transit, walk, bike, rideshare, etc.).*								
[h] *In the absence of trip-generation rates specific to Art Gallery uses, the published rates for Museum (ITE 580) in Trip Generation, 9th Edition were utilized.*								
[i] *An internal capture reduction accounts for trips made between member-only uses and public uses.*								
j Specific trip-generation rates for creative office uses have not been established. Therefore, published rates for General Office Building (ITE 710) in Trip Generation, 9th Edition were utilized.								
Source: Gibson Transportation Consulting, Inc., 2017.								

Table IV.J-8
Existing With Project Conditions (Year 2016)—Significant Impact Analysis

No.	Intersection	Peak Hour	Existing		Existing with Project			
			Delay (sec)	LOS	Delay (sec)	LOS	Change in Delay (sec)	Impact[a]
1.	Doheny Dr. & Sunset Blvd.	A.M.	27.4	F*	27.6	F*	0.2	No
		P.M.	45.4	F*	45.4	F*	0.0	No
2.	Hammond St. & Sunset Blvd.	A.M.	11.6	B	11.7	B	0.1	No
		P.M.	10.1	B	10.1	B	0.0	No
3.[b]	Hilldale Ave. & Sunset Blvd.	A.M.	0.3	A	0.7	A	0.4	No
		P.M.	0.3	A	2.0	A	1.7	No
4.	Clark St./San Vicente Blvd. & Sunset Blvd.	A.M.	17.5	F*	18.6	F*	1.1	No
		P.M.	16.7	F*	17.6	F*	0.9	No
5.	Horn Ave./Holloway Dr. & Sunset Blvd.	A.M.	24.2	C	25.1	C	0.9	No
		P.M.	21.0	C	21.3	C	0.3	No
6.	San Vicente Blvd. & Cynthia St.	A.M.	16.3	B	16.5	B	0.2	No
		P.M.	22.7	C	23.5	C	0.8	No
7.	Doheny Dr. & Santa Monica Blvd./Melrose Ave.	A.M.	159.7	F	159.3	F	—	No
		P.M.	172.8	F	172.4	F	—	No
8.	San Vicente Blvd. & Santa Monica Blvd.	A.M.	37.1	D	37.7	D	0.6	No
		P.M.	41.6	D	44.3	D	2.7	No

**LOS for commercial corridor intersections along Sunset Boulevard based on field observations, as the calculated delay for individual intersections does not, in every case, account for vehicular queues along corridors, pedestrian conflicts, etc., and, thus, the calculated average operating conditions may appear better than is observed. Therefore, for purposes of determining impacts, the worst case LOS assumed to be LOS F.*

[a] *Based on City of West Hollywood criteria, an impact is considered significant if the following criteria are met:*

Intersection Formed by Two Commercial Corridors

- *The addition of project traffic results in a LOS D and an increase in delay of 12 seconds or greater.*
- *The addition of project traffic results in a LOS E or F and an increase in delay of 8 sec. or greater.*

All Other Signalized and/or 4-Way Stop-Controlled Intersections

- *The addition of project traffic results in a LOS D and an increase in delay of 8 seconds or greater.*
- *The addition of project traffic results in a LOS E or F and an increase in delay of 5 sec. or greater.*

Unsignalized Intersections

- *The addition of project traffic results in a LOS D, E, or F and an increase in delay of 5 sec. or greater.*

[b] *Intersection is unsignalized.*

Source: Gibson Transportation Consulting, Inc., 2017.

of Project traffic is not anticipated to exceed the City's significance thresholds discussed above. Therefore, the Project would not result in a significant impact under Existing Plus Project conditions, and no mitigation measures would be required.

(c) Future Plus Project Conditions

The Future Plus Project Conditions identifies the potential incremental impacts of the proposed Project at full buildout on projected future traffic operating conditions during the typical weekday A.M. and P.M. peak periods by adding the net Project-generated traffic to the Future Without Project traffic forecasts for the year 2020. All future background traffic growth (i.e., ambient and related project traffic growth) and transportation system improvements are assumed in this analysis.[7] As shown in Table IV.J-9 on page IV.J-40, under Future Plus Project Conditions, four of the eight study intersections are projected to operate at LOS D or better during both the morning and afternoon peak hours. The remaining four intersections are projected to operate at LOS F during both of the analyzed peak hours. However, as also shown in Table IV.J-9, the incremental increase in delay with the addition of Project traffic is not anticipated to exceed the City's significance thresholds discussed above. Therefore, the proposed Project would not result in a significant impact under Future Plus Project conditions, and no mitigation measures would be required.

(d) Congestion Management Program

(i) CMP Intersections

As noted above, the CMP requires that a TIA be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the A.M. or P.M. weekday peak hours. Three arterial CMP intersections are located near the Project Site:

- Doheny Drive and Santa Monica Boulevard/Melrose Avenue
- La Cienega Boulevard and Santa Monica Boulevard
- La Cienega Boulevard and Wilshire Boulevard

Because these intersections are located outside the Project Study Area, A.M. and P.M. peak-hour traffic for these intersections was based on the number of trips entering and

[7] *As noted previously, a complete list of related projects is included in Section III, Environmental Setting, of this Draft EIR. A description of the transportation system improvements assumed in this analysis is described in Chapter 3 of the Traffic Study, included as Appendix H of this Draft EIR.*

Table IV.J-9
Future With Project Conditions (Year 2020)—Significant Impact Analysis

No.	Intersection	Peak Hour	Future Without Project		Future With Project			
			Delay (sec)	LOS	Delay (sec)	LOS	Change in Delay (sec)	Impact[a]
1.	Doheny Dr. & Sunset Blvd.	A.M.	33.2	F*	33.6	F*	0.4	No
		P.M.	42.8	F*	45.5	F*	2.7	No
2.	Hammond St. & Sunset Blvd.	A.M.	27.7	C	28.3	C	0.6	No
		P.M.	17.4	B	17.5	B	0.1	No
3.[b]	Hilldale Ave. & Sunset Blvd.	A.M.	0.7	A	1.1	A	0.4	No
		P.M.	0.8	A	4.0	A	3.2	No
4.	Clark St./San Vicente Blvd. & Sunset Blvd.	A.M.	22.7	F*	25.2	F*	2.5	No
		P.M.	24.0	F*	25.4	F*	1.4	No
5.	Horn Ave./Holloway Dr. & Sunset Blvd.	A.M.	28.5	C	29.4	C	0.9	No
		P.M.	24.8	C	25.2	C	0.4	No
6.	San Vicente Blvd. & Cynthia St.	A.M.	15.6	B	15.8	B	0.2	No
		P.M.	36.3	D	37.0	D	0.7	No
7.	Doheny Dr. & Santa Monica Blvd./Melrose Ave.	A.M.	139.3	F	140.0	F	0.7	No
		P.M.	164.6	F	165.7	F	1.1	No
8.	San Vicente Blvd. & Santa Monica Blvd.	A.M.	85.0	F	85.1	F	0.1	No
		P.M.	84.4	F	85.0	F	0.6	No

**LOS for commercial corridor intersections along Sunset Boulevard based on field observations, as the calculated delay for individual intersections does not, in every case, account for vehicular queues along corridors, pedestrian conflicts, etc., and, thus, the calculated average operating conditions may appear better than is observed. Therefore, for purposes of determining impacts, the worst case LOS assumed to be LOS F.*

[a] *Based on City of West Hollywood criteria, an impact is considered significant if the following criteria are met:*

Intersection Formed by Two Commercial Corridors

- *The addition of project traffic results in a LOS D and an increase in delay of 12 seconds or greater.*
- *The addition of project traffic results in a LOS E or F and an increase in delay of 8 sec. or greater.*

All Other Signalized and/or 4-Way Stop-Controlled Intersections

- *The addition of project traffic results in a LOS D and an increase in delay of 8 seconds or greater.*
- *The addition of project traffic results in a LOS E or F and an increase in delay of 5 sec. or greater.*

Unsignalized Intersections

- *The addition of project traffic results in a LOS D, E, or F and an increase in delay of 5 sec. or greater.*

[b] *Intersection is unsignalized.*

Source: Gibson Transportation Consulting, Inc., 2017.

exiting the Study Area in the direction of the outlying CMP arterial monitoring intersections, conservatively assuming there would be no diverging trips. Based on this methodology, the proposed Project would not add more than 50 peak-hour trips to any of the three arterial monitoring intersections.[8] Therefore, no further analysis is required.

(ii) CMP Freeway Segments

The CMP also requires a TIA be performed for all CMP mainline freeway monitoring locations where a project would add 150 or more trips in either direction during either A.M. or P.M. peak hours. The following three CMP mainline freeway segments are located approximately 4.5 miles of the Project Site:

- I-10 at Overland Avenue (Eastbound and Westbound)
- I-10 at La Brea Avenue (Eastbound and Westbound)
- US-101 south of Santa Monica Boulevard (Northbound and Southbound)

As detailed in the Traffic Study, the proposed Project would add a maximum of 40 trips in either direction at each of the above freeway segments, which is less than the 150-trip threshold for performing a TIA under Los Angeles County's CMP.[9] Therefore, no CMP impact would occur, and no additional freeway analysis is required.

(iii) Regional Transit

Accounting for internal capture reductions and the removal of existing uses, but prior to the trip reduction adjustments, the proposed Project is anticipated to generate approximately 139 A.M. peak-hour trips and 182 P.M. peak-hour trips. Assuming an AVO of 1.4, the proposed Project's vehicle trips result in an estimated increase of 195 person trips during the A.M. peak hour and 255 person trips during the P.M. peak hour. Conservatively using the 15-percent mode split, the proposed Project would generate approximately 29 net new transit trips during the A.M. peak hour and 38 net new transit trips during the P.M. peak hour. As discussed above and shown in Table IV.J-2 on page IV.J-19, the residual capacity of the analyzed transit lines within the Study Area during the morning and afternoon peak hours is approximately 1,411 and 1,365 trips, respectively. The proposed Project's A.M. and P.M. peak-hour person trips by transit are projected at 29 and 38 trips, respectively, or approximately less than three (3) percent of the available capacity during

[8] *See the Traffic Study, page 47.*

[9] *See the Traffic Study, page 47.*

A.M. and P.M. peak hours. Therefore, the proposed Project would not exceed regional transit capacity, and transit impacts would be less than significant.

(3) Emergency Access

(a) Construction

As discussed above, construction of the proposed Project would result in additional traffic on streets within the Study Area. Construction of the proposed Project may also include temporary encroachments into the public right-of-way and temporary traffic controls. However, with implementation of the Construction Management Plan, included as Project Design Feature J-1, which requires the proposed Project to use of temporary traffic controls to improve traffic flow on public roadways and schedule construction activities to reduce the effect on traffic flow, impacts to emergency access would be less than significant.

(b) Operation

Primary access to the Project Site would be via the vehicle entrance on Hilldale Avenue. Emergency vehicles would be able to temporarily park along the curbs on Sunset Boulevard and Hilldale Avenue. Additionally, the proposed Project would include an emergency helipad on the roof of the building. Furthermore, the proposed Project does not include permanent lane or street closures that would impede emergency access to nearby properties. The proposed Project would also be subject to review by the City's Building and Safety Division, the Los Angeles County Sheriff's Department, and the Los Angeles County Fire Department, which would ensure any concerns about emergency access are adequately addressed. Therefore, the proposed Project would not result in impacts to emergency access during operation.

(4) Bicycle Facilities, Pedestrian Facilities, and Public Transit

(a) Bicycle and Pedestrian Facilities

As noted above, there are no designated bicycle routes or lanes near the Project Site. Sidewalks are available along Sunset Boulevard and Hilldale Avenue. While sidewalks adjacent to the Project Site along Sunset Boulevard and Hilldale Avenue may temporarily be impacted due to Project construction, implementation of the Construction Management Plan, included as Project Design Feature J-1 would include safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, as appropriate.

The proposed Project would provide bicycle parking for employees and visitors in accordance with the requirements of the WHMC. With respect to pedestrian facilities, the

ground level of the proposed building would incorporate a landscaped community plaza to enhance the pedestrian experience along this portion of Sunset Boulevard. In addition, valet services and parking would be fully enclosed, with access via Hilldale Avenue only, so as not to detract from the pedestrian experience on Sunset Boulevard.

Therefore, the proposed Project would not conflict with adopted policies, plans, or programs regarding bicycle or pedestrian facilities. Impacts would be less than significant, and no mitigation measures would be required.

(b) Public Transit

As discussed above under the CMP Regional Transit analysis, the proposed Project's A.M. and P.M. peak-hour person trips by transit are projected at 29 and 38 trips, respectively, or approximately less than three (3) percent of the available capacity during A.M. and P.M. peak hours. Therefore, impacts to public transit would be less than significant.

(5) Parking

Pursuant to Public Resources Code Section 21099(d)(1), because the proposed Project is an employment center project located on an infill site within a transit priority area, any parking impacts of the Project shall not be considered significant impacts on the environment. Nevertheless, the following parking analysis is provided for informational purposes.

The proposed Project would provide 354 parking spaces, 349 of which would be served by the automated parking system. The remaining 5 parking spaces would be on-site parking spaces located on the partial subterranean level (Level B1), which would accommodate unconventional vehicle sizes and temporary parking.

While the proposed Project's off-street parking supply would not meet the City's standard parking requirements under the WHMC, such requirements are not necessarily reflective of the parking demands of a development as a whole. The parking requirements under the WHMC represent the sum of the peak parking requirements for each individual land use and do not take into account a shared parking concept (i.e., the hourly and/or day of the week variations in parking demand generated by individual land uses) or for the synergy between uses. The WHMC analysis assumes that the demand for each land use peaks at the same time, which may lead to the provision of more parking than is needed at any given time (i.e., overestimation of required parking). Section 19.28.070 of the WHMC allows for reductions in parking requirements based on a shared parking concept if a shared parking demand study is performed to provide justification for the number of parking spaces a project would actually require. Therefore, a shared parking analysis was

performed for the proposed Project to determine the appropriate number of parking spaces to support the proposed Project.

As modeled by the proposed Project's shared parking demand analysis and described in the Traffic Study, the peak-hour demand would occur at 9:00 P.M. on a December Saturday, the busiest hour of the year for parking demand. The model estimates that the busiest hour of the year would experience a parking demand of 339 spaces for Arts Club uses and 11 spaces for retail and art gallery uses. As the proposed Project's office uses would not be anticipated to be in operation during that hour and would, therefore, not require use of any parking, the December Saturday peak parking demand would be 350 spaces. In addition, the shared parking demand model estimated that a peak weekday parking demand would occur at 1:00 P.M. and account for a demand of 317 spaces. Therefore, both the peak Saturday and peak weekday demands would be accommodated within the proposed Project's on-site supply of 354 parking spaces. In addition, the proposed Project would also implement Project Design Feature J-2, which requires the proposed Project to implement a Parking Management Plan, to manage peak parking demands to avoid potential parking impacts on the street network and surrounding community. As mentioned above, in accordance with SB 743, this impact would not be considered significant.

6. Cumulative Impacts

a. Construction

Cumulative construction traffic impacts would occur if construction traffic from the related projects would impact the same roadways, intersections, access points, or freeway segments as the proposed Project. Several of the related projects are in proximity to the Project Site and have the potential to affect some of the same study intersections and roadways. Each of these developments would draw upon a construction workforce from all parts of the Los Angeles area. However, as with the proposed Project, the majority of construction workers on related projects are anticipated to arrive and depart the individual construction sites primarily during off-peak hours, consistent with the permitted construction hours of the local jurisdictions and typical construction work hours, thereby minimizing trips during the A.M. and P.M. peak traffic periods. In addition, any haul truck routes for the related projects would be approved by the appropriate jurisdiction according to the location of each individual construction site. Each jurisdiction's review process would take into consideration the potential for overlapping construction projects and would attempt to balance haul routes to minimize the impacts of cumulative hauling on any particular roadway. Furthermore, it is anticipated that the related projects would be required to prepare a Construction Management Plan to ensure that potential construction-related impacts are reduced. As such, cumulative construction traffic impacts are anticipated to be less than significant.

With respect to access and safety, the proposed Project's construction is not expected to create hazards for roadway travelers, bus riders, or people utilizing on-street parking spaces, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) will be incorporated into the Construction Management Plan approved by the City, as set forth in Project Design Feature J-1. With implementation of this project design feature, cumulative impacts to access and safety would be less than significant.

As noted above, there are no bus stops adjacent to the Project Site that would be affected by construction of the proposed Project. Therefore, the proposed Project would not result in cumulative impacts to public transit during construction.

Additionally, as discussed above, the proposed Project's may temporarily interfere with up to four on-street metered parking spaces on Sunset Boulevard and up to three on-street metered parking spaces on Hilldale Avenue. However, adequate parking for construction workers would be secured in the vicinity of the Project Site. Restrictions against workers parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site will be required as part of the approved Construction Management Plan, included as Project Design Feature J-1. Therefore, the proposed Project's cumulative contribution to parking impacts during construction would also be less than significant.

b. Operation

The traffic models used in the above analysis incorporated forecasted traffic increases due to ambient growth as well as the related projects through the year 2020. Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections and the regional transportation system, neighborhood intrusion, and access as a result of the proposed Project are accounted for in the analysis above.

(1) Intersection Levels of Service

As detailed above, under cumulative conditions (Future Plus Project Conditions), none of the study intersections would experience significant impacts as a result of the proposed Project. Therefore, the proposed Project's contribution to impacts that would occur under the future cumulative conditions would not be considerable, and cumulative impacts at all study intersections would be less than significant.

(2) Regional Transportation System

As described above, the proposed Project would not add more than 50 vehicle trips during the A.M. and P.M. peak hours at the CMP arterial intersections nearest to the Project Site. Additionally, the proposed Project would add fewer than 150 trips along the freeway mainline segments closest to the Project Site. Furthermore, the proposed Project would not result in significant transit impacts. Thus, no CMP or transit impacts would occur under the proposed Project and, as a result, the proposed Project's contribution to cumulative impacts would not be cumulatively considerable. Thus, the proposed Project's cumulative impacts with regard to the CMP and transit would be less than significant.

(3) Emergency Access

As analyzed above, the proposed Project would not result in significant impacts to emergency access on or near the Project Site. In addition, as with the proposed Project, it is anticipated that future related projects would be subject to review by local building departments, police departments, and fire departments to ensure that related projects are designed with adequate emergency access. Therefore, the proposed Project's contribution to impacts that would occur under the future cumulative conditions would not be considerable, and cumulative impacts at all study intersections would be less than significant.

(4) Bicycle Facilities, Pedestrian Facilities, and Public Transit

As analyzed above, the proposed Project would not result in significant impacts to bicycle facilities, pedestrian facilities, or public transit. In addition, as with the proposed Project, it is anticipated that future related projects would be subject to review by the appropriate jurisdiction to ensure that related projects do not result in significant impacts to these facilities. Therefore, the proposed Project's contribution to impacts that would occur under the future cumulative conditions would not be considerable, and cumulative impacts to bicycle and pedestrian facilities and public transit would be less than significant.

(5) Parking

Pursuant to Public Resources Code Section 21099(d)(1), because the proposed project is an employment center project located on an infill site within a transit priority area, any parking impacts of the project shall not be considered significant impacts on the environment. Nevertheless, the following parking analysis is provided for informational purposes.

With regard to the City's off-street parking requirements, parking requirements under the WHMC assume that each land use has the same peak demand time. As discussed

above, this assumption can potentially lead to an overestimation of required parking. Nonetheless, similar to the proposed Project, related projects would be subject to the parking requirements under the WHMC, as well as City review, to ensure that adequate parking would be provided for each of the related projects. Although the proposed Project would not fulfill the applicable standard minimum parking required by the WHMC, the proposed Project's shared parking demand analysis confirms that the peak parking demands of the proposed Project (i.e., Saturdays at 9:00 P.M. in the month of December) would be sufficiently accommodated within the proposed Project's on-site parking supply. In addition, a Parking Management Plan will minimize potential parking impacts of the proposed Project through traffic demand management strategies, in accordance with Project Design Feature J-2. Therefore, the proposed Project's cumulative parking impacts during operation would not be considered significant.

7. Mitigation Measures

a. Construction

With implementation of Project Design Feature J-1, construction-related traffic, access and safety, bus/transit, and parking impacts would be less than significant. Therefore, no mitigation measures are necessary.

b. Operation

Operational impacts to intersection levels of service; the regional transportation system; emergency access; bicycle facilities, pedestrian facilities, public transit; and parking would be less than significant. Therefore, no mitigation measures are necessary.

8. Level of Significance After Mitigation

a. Construction

With implementation of Project Design Feature J-1, construction-related traffic impacts associated with truck activity and construction worker traffic, access and safety, bus/transit, and on-street parking during the construction of the proposed Project would be less than-significant without mitigation. Cumulative impacts would also be less than significant without mitigation.

b. Operation

Operational impacts with respect to intersection levels of service; the regional transportation system; emergency access; bicycle facilities, pedestrian facilities, public

transit; and parking would be less than significant without mitigation. Cumulative impacts would also be less than significant without mitigation.