

Appendix J

Transportation Impact Study

Memorandum

Date: January 7, 2025
To: City of West Hollywood
From: John Muggridge, AICP and Nata Kovalova, Fehr & Peers
Subject: **CEQA Transportation Impact Study for 1000 N La Brea Avenue**

LA23-3494

This technical memorandum documents the transportation impact study for the proposed mixed-used building at 1000 N La Brea (the Project) related to the implementation of SB 743. The Project is located at 1000 N La Brea Avenue in the City of West Hollywood, on the block bounded by Santa Monica Boulevard and Romaine Street. The study evaluates the potential for project-related impacts to vehicle-miles traveled; compliance with plans, programs, ordinances, and policies; increased hazards due to geometric design features or incompatible uses; and emergency access.

Fehr & Peers examined the Project against thresholds of significance identified in the *West Hollywood Transportation Impact Study Guidelines* (2021)—hereafter referred to as TIS Guidelines—and the California Environmental Quality Act (CEQA). We found that the Project would have a less-than-significant impact on the environment, and no mitigation measures are required.

Project Description

The Project site is located on the northeast corner of La Brea Avenue and Romaine Street and consists of a 35-story, 426,000-square foot development with two subterranean and five above-ground parking levels. The site is the former location of an industrial cement manufacturing plant and a commercial space that is available for lease but was most recently occupied by an antique furniture store.

The proposed Project is a mixed-use building that includes a residential component with 514 dwelling units (128 affordable and 386 market-rate) along with approximately 30,000 square feet of retail and restaurant space. The residential units would be comprised of studio, one-bedroom, and two-bedroom units. The proposed Project also includes approximately 28,000 square feet of public open space, 32,000 square feet of private open space, and 674 parking spaces.



Vehicle-Miles Traveled

As part of CEQA guidelines, proposed land-use projects need to assess whether they cause a substantial vehicle-miles traveled (VMT) impact.

Impact Criteria

The City of West Hollywood developed guidance on VMT impact analysis for development projects in their TIS Guidelines. The City's guidance is consistent with that published by the California Governors' Office of Planning and Research (OPR) in *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018).

Per OPR's guidelines, development projects in West Hollywood that meet a specific set of criteria are presumed to have a less-than-significant transportation impact, due to the proximity of high-quality transit corridors throughout the City.¹ The TIS Guidelines indicates all land use projects within the City of West Hollywood would be within a one-half mile of a stop along an existing high quality transit corridor, which is defined in California Public Resources Code Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. The Project is within one-half mile of Metro Line 4 and Metro Line 212 stops, both of which operate with service intervals of less than 15 minutes during peak commute hours. The remaining criteria, and descriptions of how the Project meets the criteria, are described below.

Criteria: Project has a Floor Area Ratio (FAR) equal to or greater than 0.75.

The Project has an FAR of 9.85. Therefore, the Project meets this criterion.

Criteria: Project does not have more than the required number of parking spaces, as specified by the West Hollywood Municipal Code (City Code).

Based on City Code, the combined standard parking requirement across residential and non-residential land uses for the Project would be 923 parking spaces (68 non-residential plus 855 residential parking spaces). The Project will provide a total of 674 parking spaces (90 non-residential plus 584 residential parking spaces), which does not exceed the required number of parking spaces as specified by the City Code. Therefore, the Project meets this criterion. Details about the parking requirements for each land use are discussed in further detail below.

- Retail Parking Requirements – Table 3-6 in Chapter 19.28 of the City Code states general retail stores must provide two spaces per 1,000 square feet, and restaurants must provide three and a half spaces per 1,000 square feet. The Project will construct 25,000 square feet of retail space and 5,000 square feet of restaurant space which together would have a minimum parking requirement of 68 vehicle parking spaces.

¹ Per CEQA Guidelines, § 15064.3(b)(1), projects within a one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.



- Residential Parking Requirements – Table 3-6 in Chapter 19.28 of the City Code states multi-family dwellings must provide one space for studio units up to 500 square feet², one and a half spaces for one-bedroom units, two spaces for two- to three-bedroom units, and one covered space for every four units for residential projects of five or more units. The Project is comprised of 179 studio units, 247 one-bedroom units, and 88 two-bedroom units. Based on this, the standard residential requirement would be 855 parking spaces, including guest parking.

Criteria: Project is consistent with Connect SoCal, the Southern California Association of Governments' (SGAG's) Regional Transportation Plan/Sustainable Communities Strategy.

The SCAG Connect SoCal 2024 Plan is oriented toward four goals: build and maintain a robust transportation network; develop, connect, and sustain livable and thriving communities; create a healthy region for the people of today and tomorrow; and support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region. The Project supports these goals by constructing new affordable and market-rate housing and local-serving retail within a quarter mile of a high-quality transit corridor. The Project supports Connect SoCal's goal of creating human-centered communities through elements like ground level retail, street landscaping, and an outdoor entry plaza with an art feature. The Project will not disrupt the existing transportation network, nor does it conflict with Connect SoCal's mobility goals. Therefore, the Project meets this criterion.

Criteria: Project does not replace affordable residential units with fewer affordable residential units, moderate-income residential units, or high-income residential units (i.e. must maintain the same number of existing affordable units or provide more).

The Project will construct 128 affordable units. The site is currently used for retail and industrial uses, so the Project will result in a net increase in affordable residential units on the site. Therefore, the Project meets this criterion.

Criteria: Project does not have potential for significant regional draw (commercial uses that may require specialized workforce, i.e. movie production studios).

The Project proposes a mix of residential and non-residential uses. The non-residential component of the Project will be comprised of retail and a restaurant. These land uses are similar to existing uses within the City, would not require a specialized workforce, and therefore would not have significant regional draw. Therefore, the Project meets this criterion.

Conclusion and Recommended Actions

Per the TIS Guidelines, if a development project is in the proximity of high-quality transit corridors and meets all impact criteria, it does not require more detailed VMT analysis. As shown above, the Project meets all impact criteria and is therefore presumed to have a less-than-significant impact

² The average area of the Project's studio units will be 479.6 square feet.



on VMT. By extension, this means the Project does not need to implement a transportation demand management (TDM) strategy to mitigate VMT. However, it would still be subject to the TDM requirements currently laid out in City Code Chapter 10.16 for commercial projects with a total of more than 10,000 square feet of floor area and residential projects of 20 units or more.

Plans, Ordinances, and Policies Review

The purpose of this section is to determine whether the Project conflicts with a transportation-related City plan, ordinance, or policy that was adopted to protect the environment.

Under CEQA, a project does not conflict with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Any conflict with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect, and if the conflict itself would result in a direct physical impact on the environment. The following evaluation was conducted in alignment with CEQA guidelines and the TIS Guidelines, and includes a review of the following City and regional documents:

- *City of West Hollywood's General Plan 2035 Circulation Element (2011)*
- *City of West Hollywood Pedestrian & Bicycle Mobility Plan (2017)*
- *City of West Hollywood Eastside Community Priorities Plan (2017)*
- *City of West Hollywood Smart City Strategic Plan (2018)*
- *WeHo Climate Action (2021)*
- *West Hollywood Municipal Code*
- *SCAG's Regional Comprehensive Plan (2008)*
- *SCAG's Connect SoCal 2024 Plan (2023)*
- *Antelope Valley Transit Authority Comprehensive Long-Range Transit Plan (2010)*
- *Metro Long Range Transportation Plan (2020)*

As discussed below, the proposed Project would not conflict with any program, plan, ordinance or policy addressing the circulation system, including transit, roadway, or bicycle and pedestrian facilities. This impact would be less than significant.

Transit System Project Impacts

This section evaluates potential impacts related to the transit system, including disruptions to existing transit service; interference with planned transit facilities; or conflict with adopted transit system plans, guidelines, policies, or standards.



Disruptions to Existing Transit Service

Metro Route 212 is the only transit route running directly past the Project site. This bus route provides service along La Brea Avenue and stops on the east side of La Brea Avenue just south of Santa Monica Boulevard; there are no bus stops along the Project frontage. The curbside parking lane in each direction on La Brea Avenue turns into a bus/bike priority and right-turn-only lane on weekdays between 7:00-10:00am and 3:00-7:00pm from Olympic Boulevard to Coliseum Street. Metro Route 4, Antelope Valley Transit Authority (AVTA) commuter bus Route 786, and City-operated transit services—Cityline Local, Cityline Commuter, and The PickUp—also stop within a quarter mile of the Project site.

There are currently three active driveways at the Project site along La Brea Avenue, another two driveways associated with the vacant commercial space at the Project Site along La Brea Avenue, and no active driveways at the Project site along Romaine Street. The Project's proposed plan would reduce the number of driveways on La Brea from five to one. The Project proposes one driveway along La Brea Avenue at the northwest corner of the site that would provide access to two underground levels of primarily non-residential parking. This driveway would be 20 feet wide and restricted to right-in/right-out due to its location relative to the median on La Brea Avenue. The Project would reduce the number of active driveways along La Brea Avenue and therefore is not anticipated to impact transit circulation on La Brea Avenue or Santa Monica Boulevard.

The Project also proposes installing two new adjacent driveways along Romaine Street at the southeast corner of the site. The east driveway on Romaine Street would be 20 feet wide and provide access to five levels of above ground residential parking. The west driveway on Romaine Street would be 20 feet wide and provide access to a ground level loading area. Transit services do not currently operate along Romaine Street between La Brea Avenue and Sycamore Avenue, therefore, there is no anticipated impact to transit circulation along Romaine Street.

Interference with Planned Transit Services

A review of available documents, including City of West Hollywood's website, AVTA's *Comprehensive Long-Range Transit Plan* (2010), and Metro's *Long Range Transportation Plan* (2020), found a proposed Metro rail extension that would extend the K Line north through West Hollywood and connect to the B Line at Hollywood/Highland. The closest proposed K Line station would be located at Santa Monica Boulevard and La Brea Avenue, less than a quarter mile from the Project site.

Several City plans also reference future transit improvements. The *Eastside Community Priorities Plan* includes a recommendation to promote first/last mile connections to transit centers through investments in bike and other infrastructure. The *City of West Hollywood Smart City Strategic Plan* recommends exploring an on-demand transit pilot. The Project is not expected to interfere with any of these planned transit services or facilities. Therefore, the impact is less than significant.



Inconsistencies with Adopted Transit System Plans, Guidelines, Policies, or Standards

The *West Hollywood General Plan 2035 Mobility Element* includes policies supporting the development of alternative transportation programs. Key goals and objectives described by the *Mobility Element* related to transit are:

- M-1: Develop a world-class transit system in West Hollywood.
 - M-1.1: Encourage the expansion of local and regional transit systems which serve or have alignments and stops within the City.
 - M-1.4: As feasible, expand locally provided transit services and work with regional transit providers to increase frequency, including extending frequent bus service into the evenings and on weekends.
 - M-1.5: As appropriate, work with regional transit providers to improve access to local and regional transit services, particularly for seniors and persons with disabilities, persons with low and moderate income, students, the temporarily disabled, and transit-dependent populations.
 - M-1.9: Seek to optimize traffic infrastructure and work with transit agencies to make bus travel times more competitive with automobile travel times.
- M-2: Collaborate on regional transportation solutions that improve mobility, quality of life, and environmental outcomes.
- M-5: Create an environmentally and financially sustainable transportation network that provides for the mobility and livability needs of West Hollywood residents, businesses, and visitors.

WeHo Climate Action also includes a goal to promote transit use to increase sustainable mode share in West Hollywood.

- TM-1F: Explore opportunities to improve surface bus transit and enhance supportive infrastructure (e.g., bus stops and shelters, transit and mobility lanes, traffic signal prioritization, etc.).

Expanding the transit network and increasing transit usage are also key goals of the following regional transportation plans and policies:

- The SCAG *Connect SoCal 2024 Plan* includes goals related to sustainable and equitable mobility. The plan recommends supporting mobility investments that result in improved air quality and that minimize greenhouse gas emissions and ensuring reliable, accessible, affordable, and appealing travel options are readily available.
- The SCAG *Regional Comprehensive Plan* includes an adopted policy supporting local jurisdiction programs that encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bicycle.



The proposed Project would not result in disruptions to existing transit service, interference with planned transit facilities, or conflict with adopted transit system plans, guidelines, policies, or standard. Therefore, the impact is less than significant.

Bicycle Network Project Impacts

This section reviews the potential for Project-related impacts on the bicycle network in the study area, including disruptions to existing facilities, interference with planned facilities, and conflicts with adopted plans, guidelines, policies, or standards relating to bicycles.

Disruptions to Existing Facilities

The nearest existing bicycle facilities are the bike/bus priority lanes on La Brea Avenue that run in each direction and permit parking during non-peak hours, and a signed bike route along Santa Monica Boulevard to the north of the Project site between Flores Street and Sycamore Avenue. Class III bicycle routes are also provided on Fountain Avenue and Willoughby Avenue. The facility on Fountain Avenue starts west of the Project site at Sweetzer Avenue while the facility on Willoughby Avenue starts at Hayworth Avenue. Both facilities run east to La Brea Avenue and extend beyond the City boundary into the City of Los Angeles. There are no existing bicycle facilities along Romaine Street at the Project site. None of the proposed Project features would affect any of these existing facilities. Therefore, the impact is less than significant.

Interference with Planned Bicycle Facilities

The *West Hollywood Pedestrian & Bicycle Mobility Plan* includes plans for a future shared bus/bike lane along La Brea Avenue between Willoughby Avenue and Fountain Avenue, which has already been implemented (and is discussed in the evaluation of existing facilities above). Beyond this bicycle facility, there are no planned bicycle facilities adjacent to the Project site. Therefore, the Project's impact in this regard is less than significant.

Conflicts with Adopted Bicycle Plans, Guidelines, Policies, or Standards

The vision of the *West Hollywood Pedestrian & Bicycle Mobility Plan* is to put forward strategies that will "enhance the City's streets to be more comfortable, safe, and inviting to pedestrians and bicyclists of all ages and abilities." The overarching strategy is to prioritize some streets for certain modes and other streets for other modes of transportation. Beyond proposing improvements to the bicycle network, the plan includes a policy recommendation to update bicycle parking requirements in the City Code. The *Eastside Community Priorities Plan* is consistent with the *West Hollywood Pedestrian & Bicycle Mobility Plan*, recommending that the City focus on Willoughby Avenue and Fountain Avenue for east/west bicycle infrastructure improvements.

The *West Hollywood General Plan 2035 Mobility Element* also includes policies supporting the development of a comprehensive bicycle network throughout the City. Key goals and objectives described by the *Mobility Element* are to:



- M-4.3: Where feasible, install bicycle amenities including parking, storage, dedicated bicycle lanes, and bicycle wayfinding/signage along planned bicycle routes, throughout commercial areas, and at public facilities.
- M-4.4: Explore the development of bicycle stations throughout the City and at major transit stops.

The Project is providing 133 short-term bicycle parking spaces and 261 long-term bicycle parking spaces on site, along with two showers and no fewer than eight lockers for employee use, which meets the bike parking code requirements in the City Code. The Project does not conflict with adopted bicycle system plans, guidelines, policies, or standards and would not interfere with existing and future bicycle facilities. Therefore, the impact is less than significant.

Pedestrian Network Project Impacts

This section reviews the potential for Project-related impacts on the pedestrian network in the study area, including disruptions on existing facilities, interference with planned facilities, and conflicts with adopted plans, guidelines, policies, or standards relating to pedestrians.

Disruptions to Existing Facilities

Pedestrian sidewalks are provided at the Project frontage along La Brea Avenue and Romaine Street. The pedestrian network will be maintained along the Project frontage, and sidewalk widths will not change. The Project proposes reducing the total number of active driveways along the Project frontage on La Brea Avenue from three to one, reducing the possible points of vehicle/pedestrian conflicts. The Project also proposes adding two driveways along Romaine Street. The driveways along La Brea Avenue and Romaine Street would conform with City of West Hollywood design standards and would provide adequate sight distance for vehicles to see pedestrians. The proposed textured median between the east and west driveways along Romaine Street in the site plan would be at grade with the driveway, so it would not create a barrier along the sidewalk on Romaine Street and would not result in a disruption to existing pedestrian facilities. Therefore, the impact is less than significant.

Interference with Planned Pedestrian Facilities

The *West Hollywood Pedestrian & Bicycle Mobility Plan* identifies improvements at the intersection of Santa Monica Boulevard and La Brea Avenue. The proposed improvements at this intersection include leading pedestrian intervals, automatic pedestrian signals, and bike signals. The Project is nearby but not directly adjacent to this intersection and would not interfere with these improvements being implemented. The City Code also states that the minimum combined sidewalk and parkway widths shall be ten feet in all zoning districts except as otherwise provided by the Sunset Specific Plan.³ The existing sidewalk on the Project frontage is approximately ten feet wide

³ The Project site is not located within the Sunset Specific Plan area.



on Romaine Street and 15 feet wide on La Brea Avenue. The Project does not propose to modify the current sidewalk width and will not adversely affect any existing or planned pedestrian facilities. Therefore, the impact is less than significant.

Conflicts with Adopted Pedestrian Plans, Guidelines, Policies, or Standards

As previously noted, the *West Hollywood Municipal Code* indicates sidewalks on the Project's frontage shall be at least ten feet in width. The existing sidewalk on the Project frontage is approximately ten feet wide on Romaine Street and approximately 15 feet wide on La Brea Avenue. The Project does not propose to modify the current sidewalk width. Therefore, the Project would not conflict with the pedestrian-related standards in the City Code.

Pedestrian-related goals and objectives in existing local plans focus on increasing the pedestrian mode share in West Hollywood and prioritizing pedestrian experience and safety. The *West Hollywood General Plan 2035 Mobility Element* includes a goal to maintain and enhance a pedestrian-oriented City through the following policies:

- M-3.2: Seek to prioritize space for pedestrians and bicycles in the design and improvement of public rights of way.
- M-3.4: Where feasible, provide the following pedestrian amenities throughout the street network, consistent with the desired urban form and land use in this General Plan:
 - Wider sidewalks
 - Street trees and landscaping
 - Bulb-outs
 - Seating areas
 - Pedestrian-oriented lighting
- M-3.7: Limit the quantity and width of new curb cuts for vehicle access in order to improve the pedestrian network.
- 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.

The *WeHo Climate Action Plan* includes a measure to create convenient and attractive street environments, including seating and shading infrastructure that would support universal access and use of the sidewalk network. The *West Hollywood Pedestrian & Bicycle Mobility Plan* includes objectives to eliminate barriers along pedestrian routes and enhance sidewalks and crossings,



provide a convenient and connected walking network, and improve City streets and sidewalks to provide enjoyable community living spaces. The *Eastside Community Priorities Plan* points to the pedestrian improvements identified in the *West Hollywood Pedestrian & Bicycle Mobility Plan* in its recommendations. The Project supports improvements to the pedestrian environment by providing design elements such as ground level retail, street landscaping, and an outdoor entry plaza with an art feature.

The Project does not conflict with adopted pedestrian plans, guidelines, policies, or standards and would not interfere with existing and future pedestrian facilities. Therefore, the impact is less than significant.

Automobile Network Project Impacts

Consistency with the City's adopted policy for automobile traffic is addressed in the Vehicle-Miles Traveled (VMT) analysis section above. As described there, the Project would not result in significant impacts related to automobile traffic.

Conclusion and Recommended Actions

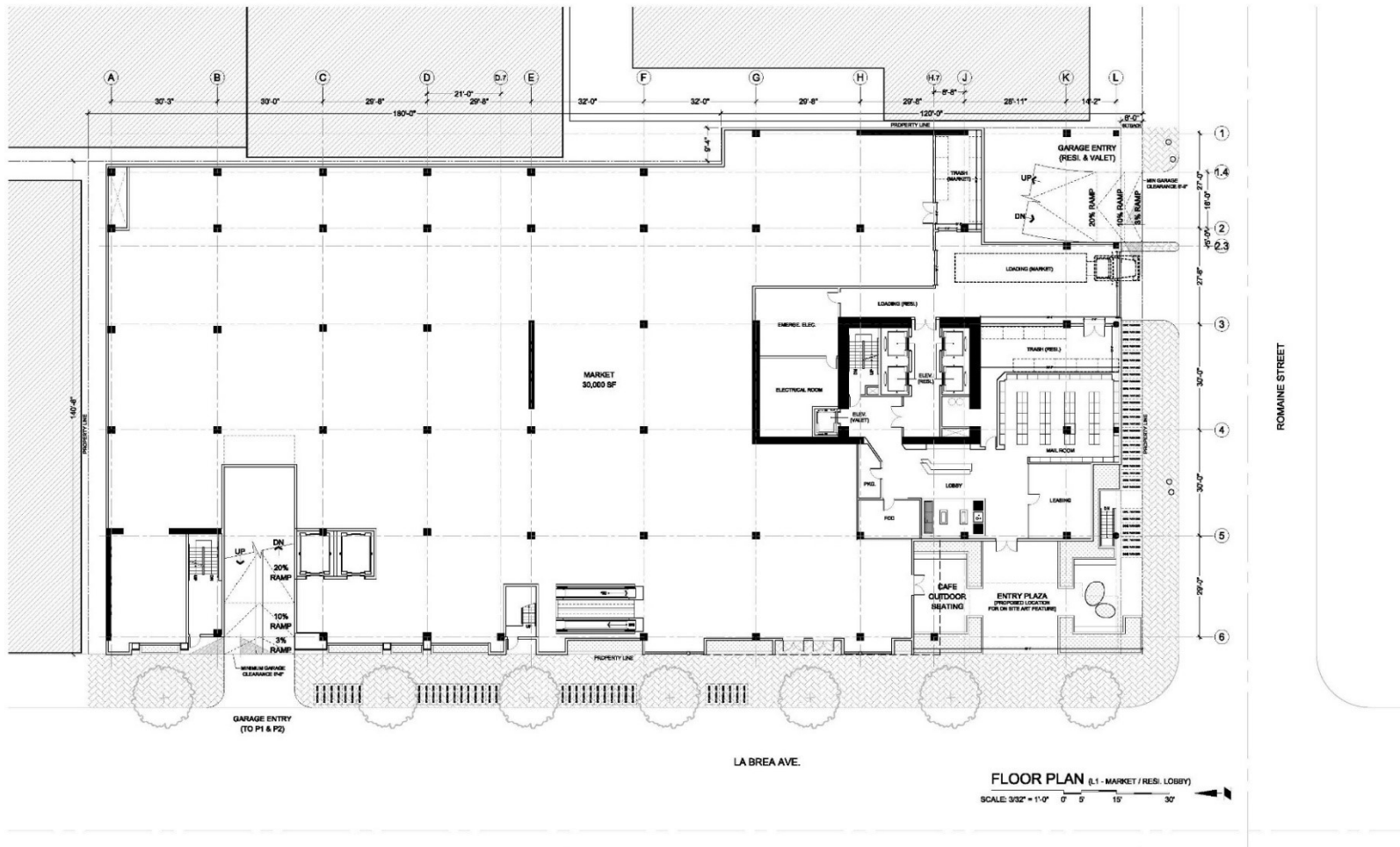
The Project features, location, and design support multimodal transportation options and would not conflict with City plans, policies, ordinances, and programs put in place to protect the environment. The Project would result in a less-than-significant impact, and therefore there are no recommended actions or mitigation measures required.

Hazards Resulting from Geometric Design Features or Incompatible Use

The Project's preliminary site plan was reviewed for potential geometric design hazards due to the configuration of Project automobile, bicycle, and pedestrian access points. Overall, the Project would not increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant. **Figure 1** illustrates the ground level site plan of the proposed development.



Figure 1: Project Site Plan, Ground Level





Impact Analysis

Automobile Access

The Project will not introduce new intersections and the proposed land uses are similar to existing land uses in the City of West Hollywood. Three active driveways on La Brea Avenue currently serve the Project site. The Project proposes a total of three vehicular access points to the Project, one of which would be on La Brea Avenue and two of which would be on Romaine Street. The driveways on Romaine Street would be adjacent to one another.

- **Driveway on La Brea Avenue:** A right-in/right-out driveway at the northwest corner of the Project site providing access to primarily non-residential parking on two subterranean levels. The subterranean parking does not connect to the parking levels accessible via Romaine Street.
- **Driveway on Romaine Street (west driveway):** A driveway on the south side of the Project site providing access to a loading area.
- **Driveway on Romaine Street (east driveway):** A driveway at the southeast corner of the Project site providing access to residential parking on five above-grade levels. This driveway would be east of the driveway that would provide access to a loading area.

The proposed driveways along Romaine Street will comply with all applicable driveway design guidelines per City standards and intersect at a right angle. The Project's driveway on La Brea Avenue would be designed to City standards and would provide adequate sight distance. None of the driveways would require the removal or relocation of existing passenger transit stops.

The Project's loading space meets City Code requirements. Section 19.28.160 of the City Code states that non-residential loading spaces shall be at least ten feet in width and 20 feet in length. For retail land uses, the City requires one off-street loading space for every 20,000 square feet or fraction thereof, which means the Project is required to provide two off-street loading spaces for its non-residential land uses. The Project currently proposes a 20-foot-wide loading area that is greater than 20 feet in length, which meets the City's minimum requirements for non-residential loading spaces. The City requires multi-family residential projects with more than 26 units to provide a minimum of 690 square feet of off-street loading space with a minimum length of 19 feet. The Project proposes an additional residential loading area that is approximately 9 feet wide. This loading area would extend from the loading space already described past the residential elevator entrance to the emergency electrical room. Assuming the non-residential loading space is shared between non-residential and residential uses, the proposed loading space meets the City's requirements for residential off-street service and delivery areas as well.



Pedestrian and Bicycle Access

The Project's geometric design features separate access to the site by travel mode. Pedestrian entrances are separated from vehicular driveways as pedestrians would primarily access the Project site through an entry plaza on the southwest corner of the Project site. The pedestrian network will be maintained along the Project frontage, sidewalk widths will not change, and the Project will provide connections to the existing sidewalk network. The Project proposes reducing the total number of active driveways along the Project frontage on La Brea Avenue from three to one, reducing the possible points of vehicle/pedestrian conflicts along this roadway. The Project also proposes adding two driveways along the Project frontage on Romaine Street, which has lower pedestrian volumes compared to La Brea Avenue. By locating the loading access point on Romaine Street, which has lower pedestrian volumes than La Brea Avenue, the Project's design reduces the likelihood of pedestrian conflicts with heavy duty trucks as well. The proposed Project driveways were evaluated for sight distance compliance with *West Hollywood Municipal Code 19.28.130(F)* to determine if motorists have adequate visibility of pedestrians. The current site plans do not show raised obstructions within the visibility triangles along the Romaine Street driveways. At the La Brea Avenue driveway, there are two street trees shown within the visibility triangle, but they are near the outer edge of the sidewalk and are not expected to block the view of passing pedestrians. Per the City Code, the foliage of these trees shall be trimmed to provide at least six feet of clear visibility from the sidewalk level. The Project driveways will not cross any existing bicycle facilities.

Driver Distraction

The Project's digital billboards have the potential to distract drivers. However, most research has not found compelling evidence in either direction on the question of whether digital signage worsens driver distraction or increases risk of collisions in urban environments, although relatively few studies have been carried out in a context comparable to the Project site.⁴ The Federal Highway Administration (FHWA) conducted an evaluation of driver distraction along freeways, highways and arterials with respect to digital (including video) or electronic billboards,⁵ which demonstrated no significant differences in the amount of time drivers spent looking at digital versus standard billboards, except under nighttime, low visual complexity conditions, where the digital displays are high contrast with the surrounding environment. The roadway conditions along the Project site would be considered a high visual complexity environment with multi-modal travel, on-street parking, traffic signals, commercial and industrial activity and signage, among other elements drivers must visually process. The Project, including the digital billboard components, would be consistent with the visually complex urban environment. Thus, there is no data-based evidence that the Project's digital billboard components would substantially increase safety hazards. Physical

⁴ Fehr & Peers has reviewed literature ranging from 1980 to 2023 on billboard effects on driver attentiveness and traffic safety, particularly more recent research on the influence of digital video signage.

⁵ *Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs*, FHWA, March 2011.



improvements along the sidewalk and changes to signal design could help reduce the risk for vehicle and pedestrian safety conflicts associated with the proposed digital billboard.

Conclusion and Recommended Actions

As described above, the Project's design does not include hazardous geometric design features. The roadways adjacent to the Project site are part of the urban roadway network and contain no sharp curves and the development of the Project would not result in roadway alterations such that hazards would be introduced adjacent to the Project site. In addition, the proposed residential and commercial uses would not conflict with other properties near the Project site or introduce hazards due to incompatible uses. Finally, there is no data-based evidence that the Project's digital billboard components would substantially increase safety hazards. Thus, the Project would result in a less-than-significant impact to hazards due to a geometric design feature or incompatible uses.

Emergency Access

The Project's preliminary site plan was reviewed for impacts to emergency access both at the site itself and along the public right-of-way adjacent to the Project. Access to the Project site would be provided by a driveway on La Brea Avenue and two driveways on Romaine Street. Emergency vehicles would be able to temporarily park along the curbs of La Brea Avenue and Romaine Street. The proposed Project is not anticipated to include permanent lane or street closures that would impede emergency access to nearby properties. In addition, the Project is not proposing any medians or turn restrictions that would reduce access to the Project site, therefore no impacts are anticipated.

Conclusion and Recommended Actions

The Project is not expected to result in permanent lane or street closures that would impede emergency access to the Project site or nearby properties. Therefore, the Project would not pose any barriers to emergency access and impacts would be less than significant.