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July 28, 2022

VIA EMAIL

Planning and Land Use Management Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA, 90012

Re: Denial of Appeal - Case Nos. CEQA No. ENV-2021-9707-CE; DIR-2021-9706-TOC-HCA Council File No 22-0485

Dear Honorable Chair Harris-Dawson:

We are writing on behalf of our client, Berendo Los Angeles Apartments, LLC ("Berendo"), who proposes to develop 77 multifamily residential units, including eight units affordable to Extremely Low-Income Households, 39 parking spaces, 65 bicycle spaces and 6,055 square feet ("sf") of open space ("Project") at 950-960 1/2 South Berendo Street ("Site") in the City of Los Angeles ("City"). The Director of the Department of City Planning ("DCP") approved the Project on March 24, 2022. No appeals were filed challenging the Transit Oriented Communities ("TOC") Additional Incentives, however, the Class 32 Categorical Exemption ("Class 32 CE") was appealed to the City Council pursuant to LAMC Section 11.5.13 and California Public Resources Code Section ("PRC") 21151(c) by the Coalition for an Equitable Westlake/Macarthur Park ("Coalition") on April 21, 2022 ("Appeal").

As detailed herein, the Appeal is entirely speculative, based on flawed assumptions and unsupported by either facts or evidence. In the March 24, 2022 letter of determination ("LOD") approving the Project, the Director substantiated all required findings, including that the Project qualifies for a Class 32 CE under the California Environmental Quality Act (Pub. Res. Code § 21000 *et seq.*) ("CEQA") and is not subject to any of the exceptions to the use of Categorical Exemptions. (14 Cal. Code Regs. §§ 15332, 15300.2.) The Appeal presents no evidence of any unusual circumstances or environmental impacts resulting from the Project, including cumulative impacts. Accordingly, we respectfully request that the Planning and Land Use Management Committee deny the Appeal.

I. The Project's Class 32 CE Findings Are Supported By Substantial Evidence.

The Appeal states that the City must demonstrate that the Project will not result in any significant impacts related to traffic, air quality, noise, or water quality, but does not specify any potential impact or any special/unique circumstances that could contribute to a potential impact. The Appeal merely states that the declining public transit ridership due to the Covid-19 pandemic should be taken into account without identifying any error or resulting impact. The Appeal also provides a list of

allegedly related projects in the Site's vicinity that should be taken into account under the Project's cumulative analysis, but does not expand or provide any actual evidence regarding how the listed projects might, in conjunction with the proposed Project, result in any cumulative impacts.

The Project LOD and Class 32 CE justification document dated March 23, 2023 ("Class 32 CE Justification") contain extensive findings the Project meets all criteria for the Class 32 CE under CEQA Guidelines Section 15332 without triggering any of the exceptions under CEQA Guidelines Section 15300.2. The Project's Class 32 CE Justification incorporates technical studies prepared by qualified and credible experts demonstrating that the Project will have no significant impacts on traffic, noise, air quality, or water quality, nor will it result in any cumulative impacts. The following additional information is submitted for the record to further address the Appeal and provide specific responses to each issue raised.

A. The Project Will Not Result In Significant Impacts Related To Traffic, Air Quality, Noise, Or Water Quality.

The Appeal relies on speculative, unsubstantiated, and generalized assumptions, and provides no evidence whatsoever that the Project would result in any significant impacts related to traffic, noise, air quality, or water quality. To the contrary, the record supports the Project's eligibility for a Class 32 CE.

Overland Traffic Consultants, Inc ("Overland") prepared a Transportation Assessment ("TA") for the Project, dated December 2021. The City Department of Transportation ("LADOT") concurred in a letter dated January 5, 2022 that the Project will not have a significant transportation impact. Although the Appeal does not specifically identify any project-level traffic impacts, Overland prepared a letter dated June 28, 2022 to address the Appeal ("Overland Supplemental Response"). (See **Attachment A**, Overland Supplemental Response.) The Overland Supplemental Response further confirms and supports the TA conclusions that the Project: (i) does not conflict with City plans, programs, ordinances or policies as it relates to vehicular, transit, bicycle and pedestrian facilities; (ii) has a less than significant VMT impact and is deemed to be consistent with the Southern California Association of Government ("SCAG") Regional Transportation Plan/ Sustainable Communities Strategy ("RTP/SCS"); and (iii) does not create any hazards due to geometric design features or incompatible uses.

The Appeal does not present any evidence of any project-level transportation impact, except to suggest pre-Covid-19 pandemic public transit ridership levels should not be relied upon for any impact conclusion. The Project site is located within 1/2 mile of the intersection of Metro Rapid Bus Lines 728 and 754, which qualifies as a Major Transit Stop. As demonstrated in the findings in the LOD and the Class 32 CE Justification, the Project is located in a transit-rich environment served by multiple high frequency bus lines and high-quality transit corridors, and within a Transit Priority Area. The Project is an approximately 750 feet from the intersection of Olympic Boulevard and Vermont Avenue where several bus lines stop, including Metro lines 204 (runs north/south from Silverlake to South Los Angeles), 28 (runs east/west from Downtown Los Angeles to Century City), and Rapid 754 (runs north/south from Silver Lake to South Los Angeles), as well as LADOT Dash bus line Wilshire Center/Koreatown (runs in loop around Koreatown and Wilshire Center). Additionally, the Project is located close to the Metro Wilshire/Vermont station with access to the Red Line (runs northeast/southeast from Downtown Los Angeles to North Hollywood) and the Purple Line (runs east/west from Downtown Los Angeles to

Koreatown), providing robust public transportation options around the Site with access to throughout greater Los Angeles. The proposed Project places market rate and affordable units in close proximity to multiple transit options thereby reducing vehicle miles traveled (VMT) and promoting various key mobility and land use planning goals. Thus, the Project will not result in any significant impacts to transportation and traffic.

Douglas Kim & Associates, LLC (“DKA”) also prepared an air quality and noise analysis for the Project in November 2021. Again, although the Appeal does not specifically identify any project-level noise or air quality impacts, DKA prepared a memorandum dated June 12, 2022 to address the Appeal (“DKA Supplemental Response”). (See **Attachment B**, DKA Supplemental Response.) The findings in the Class 32 CE Justification and the original DKA analyses demonstrate, and the DKA Supplemental Response further confirms, that with compliance with existing City regulations (i.e., LAMC Sections , 41.40, 112.02 and 112.05) construction and operational noise impacts would be less than significant. Furthermore, after compliance with regulatory requirements and adherence to industry best practices, project-related daily emissions would not exceed any regional significance thresholds for criteria pollutants, localized air quality impacts from Project activities on the offsite sensitive receptors would be less than significant, and the Project will not result in any odor related impacts. Therefore, the Project will not result in any significant impacts to noise and air quality.

Finally, with regards to water quality, as stated in the Class 32 CE Justification, the development of the Project is not adjacent to any water sources and will comply with the City’s stormwater management provision under LAMC Section 64.70. Thus, the record demonstrates the Project would not result in any significant water quality impacts.

B. The Project Will Not Result in Any Cumulative Impacts.

The Appeal identifies 17 projects that are supposedly within “0.06 miles”¹ of the Site and alleges that these projects would contribute to the Project’s cumulative impacts without providing any specific information or evidence regarding such impacts. First, these projects are not all related projects that must be considered in the Project’s cumulative analyses. The Class 32 CE Justification relied on City guidance to define the radius considered for each impact area, which resulted in the identification of 14 related projects, only one of which is located within 1,000 feet of the Project Site (966 South Dewey Avenue). Overland and DKA have both reviewed and addressed the list in the Overland Supplemental Response and the DKA Supplemental Response and found no potentially significant cumulative impacts resulting from the Project (even assuming all 17 identified developments are considered related projects). (See **Attachments A** and **B**.)

The Appeal lists related projects ranging from 0.3 miles (1,584 feet) to 0.6 miles (3,168 feet) away from the Site. Regarding the potential for noise impacts, the DKA Supplemental Response notes that:

“These locations are too distant to substantially impact the cumulative construction noise from multiple projects, as noise attenuates with distance, with a reduction of about 6 dB per doubling

¹ We believe the Appeal includes a typographical error as the letter states the 17 projects are within 0.06 miles of the Project, but the table provided in the letter identifies distances between 0.3 and 0.6 miles from the Project site. We therefore assume the Appeal intended to state within 0.6 miles of the Project site, not 0.06 miles.

of distance... [and] construction noise from all of the 17 project locations would be further attenuated with the presence of intervening structures.”

Further, because the 17 identified projects are all 0.3 miles and more from the Project site, cumulative traffic from these potential developments would be distributed onto local roads, collectors, and arterials ensuring that traffic volumes on any roadways would not produce a doubling of traffic volumes needed to elevate traffic noise by 3 dBA, let alone the 5 dBA threshold of significance for cumulative traffic noise impacts. Therefore, the Project does not have any cumulative impacts related to either construction or traffic related noise.

With regard to cumulative air quality impacts, the DKA Supplemental Response emphasizes that the South Coast Air Quality Management District (“SCAQMD”) 2003 White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution stated that “projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant.” Accordingly, the Class 32 CE Justification properly focuses on the Project’s regional and localized air quality impacts that also demonstrate the Project would not result in cumulatively considerable air quality impacts. Including additional projects to the list of related projects does not change that conclusion, and the Appeal does not provide any evidence to the contrary. Therefore, the Project does not have any cumulative impacts related to air quality.

For traffic, LADOT evaluated and confirmed the cumulative analysis through a cumulative consistency check for each of the traffic-related thresholds. (See pages 10, 13 and 14 of the TA.) Further, none of the identified related projects have access points proposed along the same block as the Project (i.e., South Berendo Street between San Marino Street and Olympic Boulevard). Again, the Appeal provides no evidence to the contrary. Therefore, the Project does not result in any transportation related cumulative impacts.

II. Conclusion

The Appeal is based on unsubstantiated claims grounded in mere speculation – with no evidence to suggest any deficiency in the CE Justification. Thus, based on the findings in the LOD and the Class 32 CE Justification, including the technical reports incorporated therein, in addition to the analyses and conclusions in the Overland Supplemental Response and the DKA Supplemental Response, the record clearly demonstrates substantial evidence in support of the Class 32 CE findings. Because the Appeal provides no evidence of any unusual circumstance or particular impact, project-level or cumulative, we respectfully request that the Planning and Land Use Management Committee deny the Appeal on its merits.

Sincerely,

Dave Rand

Dave Rand
Partner
of RAND PASTER & NELSON, LLP

Attachments

cc: Sara Houghton, 360 Consulting
Renata Ooms, Department of City Planning
Jaime Espinoza, Department of City Planning

Berendo Appeal Response Letter - Attachment A



Overland Traffic Consultants, Inc.
952 Manhattan Beach Boulevard, # 100
Manhattan Beach, CA 90266
Phone (661) 799 - 8423
E-mail: otc@overlandtraffic.com

draft

June 28, 2022

Berendo Los Angeles Apartment, LLC
c/o Mr. Fred Shaffer
Saiko Investment Corp.
1590 Rosecrans Ave. Suite D303
Manhattan Beach, CA 90266

RE: CEQA Appeal - 950- 962½ South Berendo Apartments
Case # ENV-2021-9707-CE

Dear Representative of 1401 N. Vermont Los Angeles, LLC,

This letter has been conducted in response transportation concerns listed in the California Environmental Quality Act (CEQA) Appeal objecting to the City of Los Angeles CEQA determination for a Class 32 Categorical Exemption (CE) for the proposed project at 950-962½ South Berendo Street. The CEQA Appeal's letter of justification, written on behalf of the Coalition for Equitable Westlake/MacArthur Park (Coalition), states that a before a project can be determined to qualify for a CE, exceptions to the exemption, such as cumulative impacts, must be considered. The letter mentions that any environmental impacts based on pre-Covid levels of public ridership that do not take into account declining public ridership which is expected to further decline after Covid and provides a list of 17 current and future cumulative projects with .06 mile radius of the Project that may contribute towards cumulative impacts.

The potential transportation impacts and deficiencies were evaluated in a Transportation Assessment (TA) dated December 2021 conducted by Overland Traffic Consultants. The TA evaluated potential CEQA transportation impacts and non-CEQA transportation deficiencies created by the project and by the project cumulatively with other projects in the area. The TA was reviewed and approved by Los Angeles Department of Transportation (LADOT). The LADOT review letter, dated January 5, 2022 is attached (Attachment A). The LADOT letter concurs that the project will not have a significant transportation impact.

The City of Los Angeles CEQA evaluations consider three transportation impact thresholds. These include:

T-1 Conflicting with plans, programs, ordinances, or policies;

T-2.1 Causing substantial vehicle miles traveled (VMT); and,

T-3 Substantially increasing hazards due to a geometric design feature (such as sharp curves or dangerous intersections or incompatible use (such as farm equipment)).

As required by LADOT, a cumulative consistency check is conducted for each of the thresholds. These cumulative consistency checks are provided on page 10 of the TA for Threshold T-1, page 13 of the TA for Threshold T-2.1 and page 14 of the TA for Threshold T-3.

As detailed in the TA, the project does not conflict with City plans, programs, ordinances or policies as it relates to vehicular, transit, bicycle and pedestrian facilities. The project is located in a Transit Oriented Community and will not interfere with or preclude any future transit plans in the area. Therefore the project would not contribute to a potential cumulative impact under threshold hold T-1.

The project area has a diverse set of land uses including religious institutions, restaurants, services and retail. Incorporating housing within an area of diverse land uses provides for facilities where a resident may walk, cycle, use transit or could have a shorter vehicle trip to a destination. These opportunities reduce vehicle miles traveled. Under the LADOT TAG, VMT impacts are evaluated through a consistency check with the Southern California Council of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas reduction targets. Projects that are consistent with the RTP/SCS plan in terms of development location and density are part of the regional solution for meeting air pollution and greenhouse gas goals, according to the TAG. This project has a less than significant VMT impact and deemed to be consistent with the SCAG's RTP/SCS. The project would therefore have a less than significant cumulative impact on VMT under threshold T-2.1.

The project does not create hazards due to geometric design features or incompatible uses impacts. The vehicle access is from a local street, there is no increase in the number of driveways and parking will be assigned to the residents to preclude circulation of vehicles to find an available parking space. The project's proposed driveways comply with City access requirements. Cumulative impacts could be identified for cumulative projects with

access points proposed along the same block as the proposed project. No cumulative project was identified along South Berendo Street between San Marino Street and Olympic Boulevard. With no project impacts, the project would not contribute to a cumulative impact under threshold T-3.

The proposed project does not create any significant CEQA transportation impacts.

Please contact me if you have any questions.

Sincerely,

Liz Fleming

Attachment

cc: Fred Shaffer
Matthew Stroyman

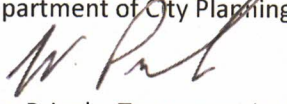
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LADOT APPROVAL LETTER

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE950-962 S Berendo St
DOT Case No. CEN21-52063

draft

Date: January 5, 2022

To: Susan Jimenez, Administrative Clerk
Department of City Planning


From: Wes Pringle, Transportation Engineer
Department of Transportation

Subject: **TRANSPORTATION ASSESSMENT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT
LOCATED AT 950-962 SOUTH BERENDO STREET (ENV-2021-9707-EAF/DIR-2021-9706-
TOC-HCA)**

The Los Angeles Department of Transportation (LADOT) has reviewed the transportation assessment prepared by Overland Traffic Consultants, Inc. (Overland), dated December 2021, for the proposed residential project at 950-962 South Berendo Street within the Central Los Angeles Area Planning Commission (APC) and a Transit Oriented Community (TOC) Tier 3. In compliance with Senate Bill (SB) 743 and the California Environmental Quality Act (CEQA), a vehicle miles traveled (VMT) analysis is required to identify the project's ability to promote the reduction of green-house gas emissions, the access to diverse land uses, and the development of multi-modal networks. The significance of a project's impact in this regard is measured against the VMT thresholds established in LADOT's Transportation Assessment Guidelines (TAG), as described below.

DISCUSSION AND FINDINGS**A. Project Description**

The project proposes to construct an 8-story residential development with a total of 77 apartments (69 market rate apartments and eight extremely low income units) at 950-962 South Berendo Street on vacant land located on the east side of Berendo Street south of San Marino Street and north of Olympic Boulevard. Parking will be provided onsite on two levels for 39 vehicles (assigned parking for 20 vehicles on the first level and 19 on the second level) and 65 bicycles (five short-term parking and long-term parking located on the second level). Since the parking levels are not internally connected, access will be provided via two driveways on Berendo Street: one driveway near the southern boundary of the site and a second driveway near the northern boundary of the site as illustrated in **Attachment A**. The project is expected to be completed by 2024.

B. Freeway Safety Analysis

Per the Interim Guidance for Freeway Safety Analysis memorandum issued by LADOT on May 1, 2020 to address Caltrans safety concerns on freeways, the study addresses the project's effects on vehicle queuing on freeway off-ramps. Such an evaluation measures the project's potential to lengthen a forecasted off-ramp queue and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline. The evaluation identified the number of project trips expected to be added to nearby freeway off-ramps serving the project site. It was determined that project traffic at any freeway off-ramp will not exceed 25 peak hour trips. Therefore, a freeway ramp analysis is not required.

C. CEQA Screening Threshold

Prior to accounting for trip reductions resulting from the application of Transportation Demand Management (TDM) Strategies, a trip generation analysis was conducted to determine if the project would exceed the net 250 daily vehicle trips screening threshold. Using the City of Los Angeles VMT Calculator tool, which draws upon trip rate estimates published in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition as well as applying trip generation adjustments when applicable, based on sociodemographic data and the built environment factors of the project's surroundings, it was determined that the project does exceed the net 250 daily vehicle trips threshold.

Additionally, the analysis included further discussion of the transportation impact thresholds:

- T-1 Conflicting with plans, programs, ordinances, or policies
- T-2.1 Causing substantial vehicle miles traveled
- T-3 Substantially increasing hazards due to a geometric design feature or incompatible use.

The assessment determined that the project would not have a significant transportation impact under Thresholds T-1 and T-3. A project's impacts per Threshold T-2.1 is determined by using the VMT calculator and is discussed further below. A copy of the VMT Calculator summary report is provided as **Attachment B** to this report.

D. Transportation Impacts

On July 30, 2019, pursuant to SB 743 and the recent changes to Section 15064.03 of the State's CEQA Guidelines, the City of Los Angeles adopted VMT as criteria in determining transportation impacts under CEQA. The LADOT TAG provide instructions on preparing transportation assessments for land use proposals and defines the significant impact thresholds.

The LADOT VMT Calculator tool measures project impact in terms of Household VMT per Capita, and Work VMT per Employee. LADOT identified distinct thresholds for significant VMT impacts for each of the seven APC areas in the City. For the Central APC area, in which the project is located, the following thresholds have been established:

- Household VMT per Capita: 6.0
- Work VMT per Employee: 7.6

As cited in the VMT Analysis report prepared by Overland, the project proposes to incorporate the TDM strategies of including bike parking per Los Angeles Municipal Code (LAMC) and, to meet the requirements of the TOC program, reduced parking supply by providing 39 of the Code-required 106 parking spaces as project design features. It should be noted that the project will also include unbundled parking as an incentive of the TOC program. With the application of these TDM strategies, the proposed project is projected to have a Household VMT per capita of 3.9 and no Work VMT. Therefore, it is concluded that implementation of the Project would result in no significant VMT impact. A copy of the VMT Calculator summary report is provided as **Attachment B**.

E. Access and Circulation

During preparation of the new CEQA guidelines, the State's Office of Planning and Research stressed that lead agencies can continue to apply traditional operational analysis requirements

to inform land use decisions provided that such analyses were outside of the CEQA process. The authority for requiring non-CEQA transportation analysis and requiring improvements to address potential circulation deficiencies, lies in the City of Los Angeles' Site Plan Review authority as established in Section 16.05 of the LAMC. Therefore, LADOT continues to require and review a project's site access, circulation, and operational plan to determine if any access enhancements, transit amenities, intersection improvements, traffic signal upgrades, neighborhood traffic calming, or other improvements are needed. In accordance with this authority, the project has completed a circulation analysis using a "level of service" screening methodology that indicates that the trips generated by the proposed development will not likely result in adverse circulation conditions at several locations. Vehicular access to the project will be provided along Berendo Street. LADOT has reviewed this analysis and determined that it adequately discloses operational concerns. A copy of the circulation analysis table that summarizes these potential deficiencies is provided as **Attachment C** to this report.

PROJECT REQUIREMENTS

Non-CEQA-Related Requirements and Considerations

To comply with transportation and mobility goals and provisions of adopted City plans and ordinances, the applicant should be required to implement the following:

1. Parking Requirements

The project would provide parking for 39 vehicles and 65 bicycles. The applicant should check with the Departments of Building and Safety and City Planning on the number of parking spaces required for this project within a TOC Tier 3.

2. Highway Dedication and Street Widening Requirements

Per the new Mobility Element of the General Plan, **Berendo Street**, a Local Street, would require an 18-foot half-width roadway within a 30-foot half-width right-of-way. The applicant should coordinate with the Bureau of Engineering's Land Development Group who will determine if there are any other applicable highway dedication, street widening and/or sidewalk requirements for this project.

3. Project Access and Circulation

The conceptual site plan for the project (see **Attachment A**) is acceptable to LADOT. The project would be accessed via two driveways on Berendo Street. Review of this study does not constitute approval of the dimensions for any new proposed driveway. Review and approval of a new driveway should be coordinated with LADOT's Citywide Planning Coordination Section (201 North Figueroa Street, 5th Floor, Room 550, at 213-482-7024). In order to minimize and prevent last minute building design changes, the applicant should contact LADOT for driveway width and internal circulation requirements prior to the commencement of building or parking layout design. The applicant should check with City Planning regarding the project's vehicular access and design.

4. Worksite Traffic Control Requirements

LADOT recommends that a construction work site traffic control plan be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <http://ladot.lacity.org/businesses/temporary-traffic-control-plans> to determine which section to

coordinate review of the work site traffic control plan. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. LADOT also recommends that all construction related truck traffic be restricted to off-peak hours to the extent feasible.

5. TDM Ordinance Requirements

The TDM Ordinance (LAMC 12.26 J) is currently being updated. The updated ordinance, which is currently progressing through the City's approval process, will:

- Expand the reach and application of TDM strategies to more land uses and neighborhoods,
- Rely on a broader range of strategies that can be updated to keep pace with technology, and
- Provide flexibility for developments and communities to choose strategies that work best for their neighborhood context.

Although not yet adopted, LADOT recommends that the applicant be subject to the terms of the proposed TDM Ordinance update expected in 2022. The updated ordinance is expected to be completed prior to the anticipated construction of this project, if approved.

6. Development Review Fees

Section 19.15 of the LAMC identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

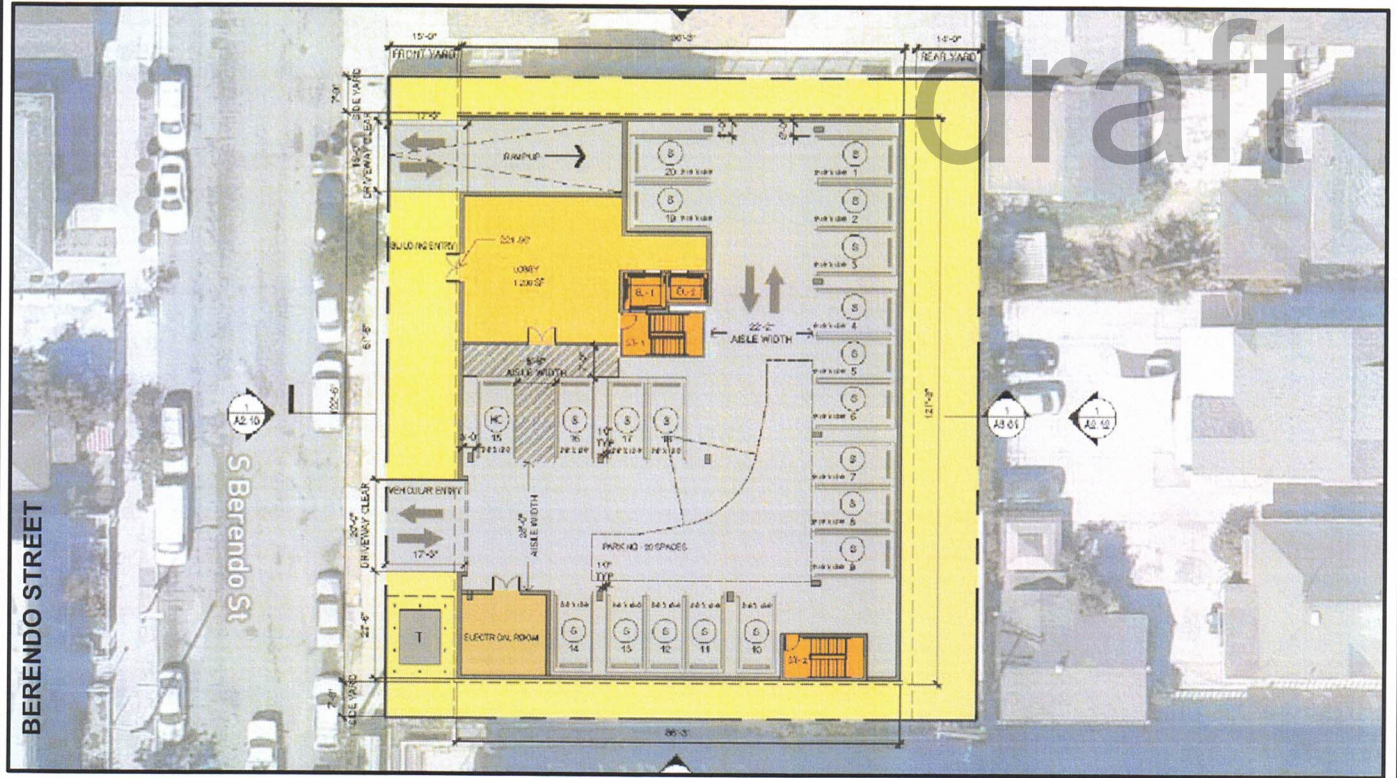
If you have any questions, please contact Eileen Hunt of my staff at (213) 972-8481.

Attachments

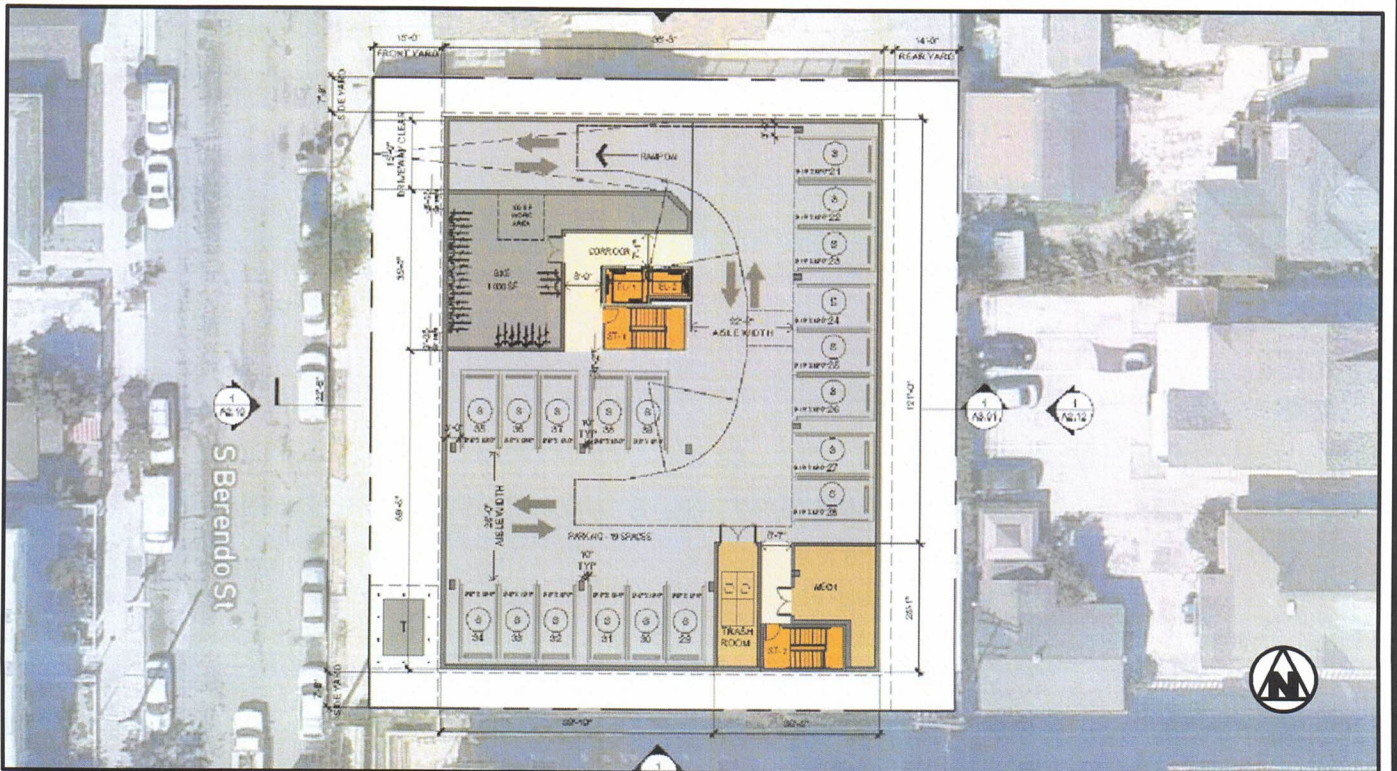
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c: Hakeem Parke-Davis, Council District 10
Hokchi Chiu, Central District, BOE
Bhuvan Bajaj, Hollywood-Wilshire District, DOT
Taimour Tanavoli, Case Management Office, DOT
Liz Fleming, Overland Traffic Consultants, Inc.

ATTACHMENT A
CEN21-52063_950-962 S Berendo_Residential



FIRST FLOOR PLAN



SECOND FLOOR PLAN

Urban Architecture Lab

FIGURE 2

PROJECT FIRST AND SECOND FLOOR PLANS

Overland Traffic Consultants, Inc.
 952 Manhattan Beach Bl. #100, Manhattan Beach, CA 90266
 (661) 799 - 8423, OTC@overlandtraffic.com

draft

ATTACHMENT B
CEN21-52063_950-962 S Berendo_Residential

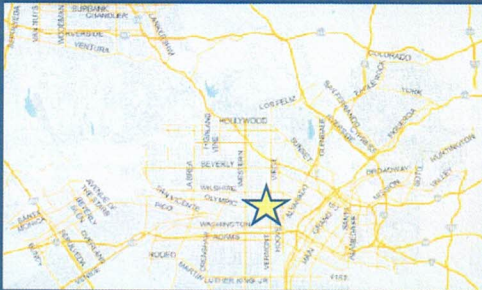
CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project:
Scenario: [WWW](#)
Address: [Q](#)



Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?

☒ Yes ☐ No

Existing Land Use

Land Use Type	Value	Unit
Housing Single Family		DU

[Click here to add a single custom land use type \(will be included in the above list\)](#)

Proposed Project Land Use

Land Use Type	Value	Unit
Housing Affordable Housing - Family	8	DU
Housing Multi-Family	69	DU
Housing Affordable Housing - Family	8	DU

[Click here to add a single custom land use type \(will be included in the above list\)](#)

Project Screening Summary

Existing Land Use	Proposed Project
0 Daily Vehicle Trips	293 Daily Vehicle Trips
0 Daily VMT	1,767 Daily VMT
Tier 1 Screening Criteria	
Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. <input type="checkbox"/>	
Tier 2 Screening Criteria	
The net increase in daily trips < 250 trips	293 Net Daily Trips
The net increase in daily VMT ≤ 0	1,767 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf
The proposed project is required to perform VMT analysis.	



draft

VTM ANALYSIS WITHOUT UNBUNDLED PARKING

CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



Project Information

Project:
Scenario:
Address: 950 S BERENDO ST, 90006



Proposed Project Land Use Type	Value	Unit
Housing Multi-Family	69	DU
Housing Affordable Housing - Family	8	DU

TDM Strategies

Select each section to show individual strategies
Use ☒ to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

Max Home Based TDM Achieved?
Max Work Based TDM Achieved?

Proposed Project
No
No

With Mitigation
No
No

(A) Parking

Reduce Parking Supply city code parking provision for the project site
☒ Proposed Prj ☐ Mitigation actual parking provision for the project site

Unbundle Parking monthly parking cost (dollar) for the project site
☐ Proposed Prj ☐ Mitigation

Parking Cash-Out percent of employees eligible
☐ Proposed Prj ☐ Mitigation

Price Workplace Parking daily parking charge (dollar)
☐ Proposed Prj ☐ Mitigation percent of employees subject to priced parking

Residential Area Parking Permits cost (dollar) of annual permit
☐ Proposed Prj ☐ Mitigation

- (B) Transit**
- (C) Education & Encouragement**
- (D) Commute Trip Reductions**
- (E) Shared Mobility**
- (F) Bicycle Infrastructure**
- (G) Neighborhood Enhancement**

Analysis Results

Proposed Project	With Mitigation
255 Daily Vehicle Trips	255 Daily Vehicle Trips
1,536 Daily VMT	1,536 Daily VMT
3.9 Household VMT per Capita	3.9 Household VMT per Capita
N/A Work VMT per Employee	N/A Work VMT per Employee

Significant VMT Impact?

Household: No	Household: No
Threshold = 6.0 15% Below APC	Threshold = 6.0 15% Below APC
Work: N/A Threshold = 7.6 15% Below APC	Work: N/A Threshold = 7.6 15% Below APC



draft

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

Project Information			
Land Use Type		Value	Units
Housing	Single Family	0	DU
	Multi Family	69	DU
	Townhouse	0	DU
	Hotel	0	Rooms
	Motel	0	Rooms
Affordable Housing	Family	8	DU
	Senior	0	DU
	Special Needs	0	DU
	Permanent Supportive	0	DU
	General Retail	0.000	ksf
Retail	Furniture Store	0.000	ksf
	Pharmacy/Drugstore	0.000	ksf
	Supermarket	0.000	ksf
	Bank	0.000	ksf
	Health Club	0.000	ksf
	High-Turnover Sit-Down	0.000	ksf
	Restaurant	0.000	ksf
	Fast-Food Restaurant	0.000	ksf
	Quality Restaurant	0.000	ksf
	Auto Repair	0.000	ksf
	Home Improvement	0.000	ksf
	Free-Standing Discount	0.000	ksf
	Movie Theater	0	Seats
	General Office	0.000	ksf
	Medical Office	0.000	ksf
Industrial	Light Industrial	0.000	ksf
	Manufacturing	0.000	ksf
	Warehousing/Self-Storage	0.000	ksf
School	University	0	Students
	High School	0	Students
	Middle School	0	Students
	Elementary	0	Students
	Private School (K-12)	0	Students
Other		0	Trips

Project and Analysis Overview

3 of 13

draft

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

Analysis Results			
Total Employees: 0			
Total Population: 181			
Proposed Project		With Mitigation	
255	Daily Vehicle Trips	255	Daily Vehicle Trips
1,536	Daily VMT	1,536	Daily VMT
3.9	Household VMT per Capita	3.9	Household VMT per Capita
N/A	Work VMT per Employee	N/A	Work VMT per Employee
Significant VMT Impact?			
APC: Central			
Impact Threshold: 15% Below APC Average			
Household = 6.0			
Work = 7.6			
Proposed Project		With Mitigation	
VMT Threshold	Impact	VMT Threshold	Impact
Household > 6.0	No	Household > 6.0	No
Work > 7.6	N/A	Work > 7.6	N/A

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CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

TDM Strategy Inputs			
Strategy Type	Description	Proposed Project	Mitigations
Parking	Reduce parking supply	City code parking provision (spaces)	106
		Actual parking provision (spaces)	106
			39
	Unbundle parking	Monthly cost for parking (\$)	39
	Parking cash-out	Employees eligible (%)	\$0
		Daily parking charge (\$)	0%
	Price workplace parking	Employees subject to priced parking (%)	\$0.00
	Residential area parking permits	Cost of annual permit (\$)	0%
(cont. on following page)			

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CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

TDM Strategy Inputs, Cont.			
Strategy Type	Description	Proposed Project	Mitigations
Transit	Reduction in headways (increase in frequency) (%)	0%	0%
	Reduce transit headways	Existing transit mode share (as a percent of total daily trips) (%)	0%
	Lines within project site improved (<50%, >=50%)	0	0
	Implement neighborhood shuttle	Degree of implementation (low, medium, high)	0
	Employees and residents eligible (%)	0%	0%
	Transit subsidies	Employees and residents eligible (%)	0%
Education & Encouragement	Amount of transit subsidy per passenger (daily equivalent) (\$)	\$0.00	\$0.00
	Voluntary travel behavior change program	Employees and residents participating (%)	0%
	Promotions and marketing	Employees and residents participating (%)	0%
(cont. on following page)			

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CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

TDM Strategy Inputs, Cont.				
Strategy Type		Description	Proposed Project	Mitigations
Commuter Trip Reductions	Required commute trip reduction program	Employees participating (%)	0%	0%
	Alternative Work Schedules and Telecommute	Employees participating (%) Type of program	0%	0%
		0	0	0
		Degree of implementation (low, medium, high)	0	0
	Employer sponsored vanpool or shuttle	Employees eligible (%)	0%	0%
		Employer size (small, medium, large)	0	0
	Ride-share program	Employees eligible (%)	0%	0%
Shared Mobility	Car share	Car share project setting (Urban, Suburban, All Other)	0	0
	Bike share	Within 600 feet of existing bike share station - OR - implementing new bike share station (Yes/No)	0	0
	School carpool program	Level of implementation (Low, Medium, High)	0	0
(cont. on following page)				

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CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

TDM Strategy Inputs, Cont.				
Strategy Type		Description	Proposed Project	Mitigations
Bicycle Infrastructure	Implement/Improve on-street bicycle facility	Provide bicycle facility along site (Yes/No)	0	0
	Include Bike parking per LAMC	Meets City Bike Parking Code (Yes/No)	Yes	Yes
	Include secure bike parking and showers	Includes indoor bike parking/lockers, showers, & repair station (Yes/No)	0	0
Neighborhood Enhancement	Traffic calming improvements	Streets with traffic calming improvements (%)	0%	0%
		Intersections with traffic calming improvements (%)	0%	0%
	Pedestrian network improvements	Included (within project and connecting off-site/within project only)	0	0

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CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

TDM Adjustments by Trip Purpose & Strategy

Place type: Urban

		Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction		Source
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
Parking	Reduce parking supply	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	TDM Strategy Appendix, Parking sections 1 - 5
	Unbundle parking	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Parking cash-out	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Price workplace parking	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Residential area parking permits	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Transit	Reduce transit headways	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Transit sections 1 - 3
	Implement neighborhood shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Transit subsidies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Education & Encouragement	Voluntary travel behavior change program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Education & Encouragement sections 1 - 2
	Promotions and marketing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Commute Trip Reductions	Required commute trip reduction program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Commute Trip Reductions sections 1 - 4
	Alternative Work Schedules and Telecommute Program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Employer sponsored vanpool or shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Ride-share program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Shared Mobility	Car-share	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Shared Mobility sections 1 - 3
	Bike share	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
	School carpool program	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

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CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

TDM Adjustments by Trip Purpose & Strategy, Cont.

Place type: Urban

		Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction		Source
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
Bicycle Infrastructure	Implement/ Improve on-street bicycle facility	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Bicycle Infrastructure sections 1 - 3
	Include Bike parking per LAMC	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	
	Include secure bike parking and showers	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Neighborhood Enhancement	Traffic calming improvements	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Neighborhood Enhancement sections 1 - 2
	Pedestrian network improvements	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

Final Combined & Maximum TDM Effect

	Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction	
	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
COMBINED TOTAL	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%
MAX. TDM EFFECT	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%

$$= \text{Minimum}(X\%, 1 - [(1-A) * (1-B) \dots])$$

where X%=

PLACE	urban	75%
TYPE	compact infill	40%
MAX:	suburban center	20%
	suburban	15%

Note: $1 - [(1-A) * (1-B) \dots]$ reflects the dampened combined effectiveness of TDM Strategies (e.g., A, B,...). See the TDM Strategy Appendix (*Transportation Assessment Guidelines Attachment G*) for further discussion of dampening.

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CITY OF LOS ANGELES VMT CALCULATOR

Report 4: MXD Methodology

Date: November 9, 2021

Project Name:

Project Scenario:

Project Address: 950 S BERENDO ST, 90006



Version 1.3

MXD Methodology - Project Without TDM

	Unadjusted Trips	MXD Adjustment	MXD Trips	Average Trip Length	Unadjusted VMT	MXD VMT
Home Based Work Production	69	-34.8%	45	7.8	538	351
Home Based Other Production	190	-50.0%	95	4.9	931	466
Non-Home Based Other Production	89	-5.6%	84	7.4	659	622
Home-Based Work Attraction	0	0.0%	0	6.6	0	0
Home-Based Other Attraction	91	-46.2%	49	4.4	400	216
Non-Home Based Other Attraction	21	-4.8%	20	5.6	118	112

MXD Methodology with TDM Measures

	Proposed Project			Project with Mitigation Measures		
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips	Mitigated VMT
Home Based Work Production	-13.0%	39	305	-13.0%	39	305
Home Based Other Production	-13.0%	83	405	-13.0%	83	405
Non-Home Based Other Production	-13.0%	73	541	-13.0%	73	541
Home-Based Work Attraction	-13.0%	0	0	-13.0%	0	0
Home-Based Other Attraction	-13.0%	43	188	-13.0%	43	188
Non-Home Based Other Attraction	-13.0%	17	97	-13.0%	17	97

MXD VMT Methodology Per Capita & Per Employee

Total Population: 181

Total Employees: 0

APC: Central

	Proposed Project	Project with Mitigation Measures
Total Home Based Production VMT	710	710
Total Home Based Work Attraction VMT	0	0
Total Home Based VMT Per Capita	3.9	3.9
Total Work Based VMT Per Employee	N/A	N/A



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Table 6

Existing Traffic Conditions – Without and With Project

No.	Intersection	Peak Hour	Existing 2021		Existing+ Project	
			Delay (s)	LOS	Delay (s)	LOS
1	S. Berendo Street & Olympic Boulevard	AM	5.4	A	5.6	A
		PM	7.2	A	7.3	A
2	San Marino Street & S. Vermont Avenue	AM	7.0	A	7.1	A
		PM	10.5	B	10.7	B
3	Olympic Boulevard & S. Vermont Avenue	AM	41.5	D	41.7	D
		PM	37.6	D	37.8	D

Table 7

Future Traffic Conditions – Without and With Project

No.	Intersection	Peak Hour	Future (2024) Without Project		Future (2024) With Project	
			Delay (s)	LOS	Delay (s)	LOS
1	S. Berendo Street & Olympic Boulevard	AM	5.6	A	5.8	A
		PM	7.5	A	7.6	A
2	San Marino Street & S. Vermont Avenue	AM	7.6	A	7.8	A
		PM	11.8	B	12.0	B
3	Olympic Boulevard & S. Vermont Avenue	AM	52.5	D	53.0	D
		PM	53.5	D	53.8	D

Berendo Appeal Response Letter - Attachment B



DOUGLASKIM+ASSOCIATES,LLC

To: File
From: Douglas Kim, AICP
Date: June 12, 2022
Re: 950 Berendo Street Noise Analysis

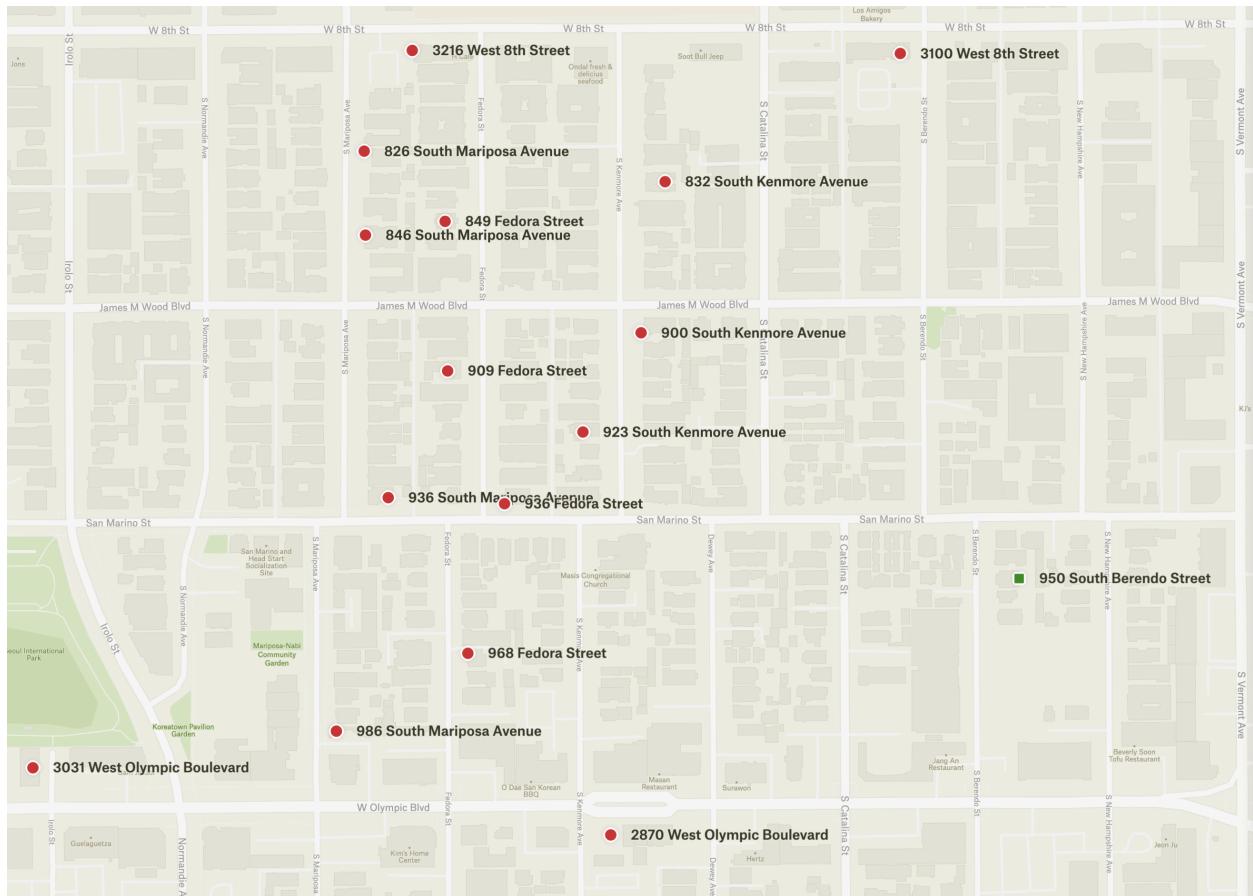
This memo responds to the April 21, 2022 comments from the Coalition for an Equitable Westlake/MacArthur Park on the November 2021 noise analysis prepared by Douglas Kim+Associates, LLC for a proposed project at 950 Berendo Street.

Comment: “[...]he Coalition submits a list of past projects, current projects and future projects spanning back to January 1, 2017 that contribute towards the cumulative impacts of the Project that must be considered. The projects listed below are all within a .06 [sic] mile radius of the Project. Many have already been approved. The area within a .06 [sic] mile radius [sic] is heavily populated and is a high pedestrian and car traffic area.

Response 1: Based on distance and noise attenuation, the cumulative construction noise impact of the project combined with any adjacent projects would not exceed the City’s 5dBA over ambient level construction noise threshold.

The November 2021 noise analysis recognized 14 related projects from the project’s traffic study, only one of which was located within 1,000 feet of the Project Site (966 South Dewey Avenue). The City of Los Angeles L.A. CEQA Thresholds Guide recommends a screening threshold of 500 feet for noise analyses. Accordingly, the noise analysis analyzed the cumulative impact of concurrent construction of the Proposed Project and this related project 500 feet to the west and found noise levels at six analyzed sensitive receptors would not be elevated by 5 dBA L_{eq} or more over ambient noise levels, the City’s threshold of significance for cumulative construction noise impacts. The highest cumulative increase would be at the Berendo Street Korean School, where construction noise would be elevated by 3.7 dBA over ambient conditions. Incidentally, this increase. was entirely from the Proposed Project with no contribution from the related project.

The commentor identified 17 potential related projects, all of which are 0.3 miles (1,584 feet) or more from the Project Site, far beyond the screening thresholds recommended by the City. These locations are too distant to substantially impact the cumulative construction noise from multiple projects, as noise attenuates with distance, with a reduction of about 6 dB per doubling of distance. Further, as shown in this exhibit, construction noise from all of the 17 project locations would be further attenuated with the presence of intervening structures, as the nearest receptors are three or more blocks away, with a number of intervening structures that would block any line-of-sight from construction noise. FTA recommends 4.5 dB attenuation for a first row of buildings and 1.5 dB for each subsequent row.



Response 2: The project and cumulative projects would not double roadway volumes such that a cumulative operational roadway noise impact would occur.

In addition to cumulative construction noise impacts, the November 2021 noise study also looked at the impact of whether cumulative development could substantially elevate traffic noise levels in the vicinity of the Project. The City finds that any increase in ambient noise levels of 5 dBA or more is considered significant.

As it takes a doubling of traffic volumes (i.e., 100 percent increase) on a roadway to elevate traffic noise by 3 dBA, the noise analysis found that the Project could add 255 vehicle trips to the local roadway network following full occupancy. The analysis found that the Project would increase traffic volumes by no more than one percent on local streets, specifically on Vermont Avenue, which carries 2,720 vehicles during a peak morning hour at Olympic Boulevard. This finding was based on the conservative assumption that all project traffic would all use the same streets to travel to and from the Project Site. Nevertheless, the analysis found that the Project would result in a negligible impact on local traffic noise.

Because the 17 related projects identified are 0.3 miles and more from the Project Site, cumulative traffic from these potential developments would be distributed onto local roads, collectors, and arterials that would ensure that traffic volumes on any roadways would not produce a doubling of traffic volumes needed to elevate traffic noise by 3 dBA, let alone the 5 dBA threshold of significance for cumulative traffic noise impacts.

As such, cumulative development would not substantially impact traffic noise in the vicinity of the Project.

Finally, with regard to cumulative air quality impacts, the South Coast Air Quality Management District's published guidance confirms that air quality impacts are measured on a per project rather than a cumulative basis.

Specifically, the SCAQMD's 2003 White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution stated: "As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR...Projects that exceed the project-specific significance threshold are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant."

As such, the November 2021's cumulative air quality analysis focused on the Project's regional and localized air quality impacts. In finding that the Project would not exceed the SCAQMD's thresholds of significance for regional and localized air quality impacts, the analysis concluded that the project would not result in cumulative considerable impacts on air quality.