



Hirsch/Green Transportation Consulting, Inc.

June 17, 2024

Whitley Apartment, LLC  
c/o Mr. Fari Moshfegh  
P.O. Box 49953  
Los Angeles, California 90049

RE: Response to Appellant Comments Received on Vehicle Miles Traveled (“VMT”) Analysis  
Prepared for Proposed Whitley Hotel Project Located at 1719 – 1731 Whitley Avenue  
in the City of Los Angeles, California

Dear Mr. Moshfegh,

Per the request of Mr. Daniel Freedman of Jeffer Mangels Butler & Mitchell LLP, we have reviewed comments received from the appellant regarding the vehicle miles traveled (“VMT”) assessment prepared by our firm (dated “June 11, 2024”) for the proposed 156-room hotel project located at 1719 – 1731 Whitley Avenue in the Hollywood community of the City of Los Angeles. Specifically, the appellant noted issues associated with the potential effects of reductions in the availability of public transportation services in the project vicinity (since the project’s original traffic study was prepared by DC Engineering Group in February of 2017) on our VMT analyses. Our responses to those issues are provided in the following pages of this document.

The VMT calculations used in our report are based on the current VMT Calculator (Version 1.4), issued by LADOT in June of last year. The VMT Calculator includes reductions in the amount of VMT and number of vehicle trips generated by the proposed project to account for transit usage, along with other VMT/trip adjustment factors like the jobs/housing balance in the project vicinity, the development density of the area surrounding the project site, the “connectivity” for walking or driving among different activities and number of convenient trip destinations in the project vicinity, and typical vehicle ownership in the area. However, the effects of such factors on the amount of VMT and/or number of vehicle trips generated by the subject project are an intrinsic part of the VMT Calculator, and cannot be modified by users of the program. The appellant’s comments noted that our June 11, 2024 VMT evaluation did not discuss changes in public transit service in the project vicinity since the DC Engineering Group’s February 2017 traffic study was prepared. The response is that we did not mention any changes in public transit service in the project area because changes to the VMT Calculator assumptions in that regard cannot be made. Additionally, since the VMT Calculator was updated about a year ago (around June of 2023), it is reasonable to assume that any recent modifications to the public transportation service in the project vicinity by either the Los Angeles County Metropolitan Transportation Authority (“Metro”) and/or other transit providers up to that date have been incorporated into the current version of the program.

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Additionally, a review of the “transit credit” factor used in the project’s February 2017 traffic study indicates that this vehicle trip reduction factor was assumed to be only five percent (5%) of the gross number of trips generated by both the proposed project and the existing site development. This transit-related vehicle trip reduction has no direct effect on the VMT assessment, and further, is relatively conservative, as the City of Los Angeles Department of Transportation (“LADOT”), which reviewed and approved the subject transit credit assumption for the project’s traffic study, could have allowed up to a 10 percent trip reduction for transit usage for the project based on the criteria identified in their current Transportation Assessment Guidelines (“TAG”, August 2022).

Further, a review of Table 6 (page 22) of the February 2017 project traffic study indicates that the effect of the assumed transit credit was nominal, resulting in a total net reduction in project traffic of only three trips during each of the AM and PM peak hours. Simply put, without the assumed transit credit, the subject project would generate three more net trips during each of the peak hours, including two additional inbound trips and one additional outbound trip during the AM peak hour, and one additional inbound trip and two additional outbound trips during the PM peak hour. Finally, a review of Table 8 (page 30) of that report shows that the proposed project’s incremental impacts were well below the then-applicable impact “significance” thresholds at all of the study intersections. Therefore, the addition of three total trips during either the AM or PM peak hours would not change the conclusions of the February 2017 traffic study that no significant impacts would occur.

Please review the preceding information, and let us know if you have any questions.

Sincerely,



Ron Hirsch, P.E.  
Principal