

Email Transmittal

March 1, 2021

Mr. Louis Heilbron
President
Sagamore Consulting Services, Inc.
7944 Marquand Avenue
West Hills, CA 91304

Re: Response to Comments on the Transportation Assessment prepared for the Proposed
Temple & Glendale Mixed-Use Project, City of Los Angeles

Dear Louis,

1614 Temple LLC is proposing to develop a mixed-use residential project at 1614 West Temple Street in the City of Los Angeles (the "City"). The project would consist of the construction of 72 apartment units, including seven affordable units, and 750 square feet of ground-floor retail space (the "Project"). The Project site is located on the south side of Temple Street, approximately one-half block west of Glendale Boulevard, in the Westlake Community Plan Area. The Project site is bounded by Temple Street to the north, an alley to the east, commercial uses to the west, and residential uses to the south. The Project proposes to provide access to the Project parking facilities via a driveway along Temple Street and a driveway along the alley. A Transportation Assessment (TA) was prepared for the Project in February 2020 following the Los Angeles Department of Transportation's (LADOT's) *Transportation Assessment Guidelines* (TAG). The TA was reviewed by LADOT and the findings and conclusions of the report were confirmed in the LADOT Assessment Letter received on March 3, 2020. Following the Los Angeles Department of City Planning's review of the Project, an appeal was filed identifying concerns regarding the findings of the TA. This technical letter has been prepared to address the concerns identified in the comment letter prepared by RK Engineering Group, Inc. on February 25, 2021.

COMMENT 1 – TRIP GENERATION CALCULATIONS AND DETERMINATION OF IMPACTS

The first comment provided in the letter dated February 25, 2021 addresses the daily trip generation calculations conducted for the Project. The daily trip generation calculations presented in the Project TA were conducted using the LADOT VMT Calculator Version 1.1 (the VMT Calculator), which was the most updated version of the calculator at the time of preparation of the TA. Based on the VMT Calculator, the Project is expected to generate 247 daily trips with the implementation of Transportation Demand Management (TDM) features that have been proposed as part of the Project. Per the TAG and as confirmed in correspondence with the LADOT, TDM measures that are required by state or local law or ordinance, such as parking reductions and unbundled parking as outlined in the Transit Oriented Communities (TOC) Ordinance, can be considered as Project features in the VMT Calculator. A summary report of the VMT Calculator outputs are provided in Appendix B to the TA dated November 2019.

The comment letter suggests that, based on trip generation rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, the Project would generate approximately 346 daily trips. This estimate of daily trips was calculated using trip generation rates from the *Trip Generation Manual* (10th Edition, 2017) for the General Urban/Suburban setting. The ITE General Urban/Suburban setting is characterized as a region with low-to medium-density development and limited pedestrian, bicycle, and transit facilities in which nearly all trips are expected to occur by vehicle. Since the General Urban/Suburban setting does not fully account for the trip reduction potential of the City's vast transit, bicycle, and pedestrian network and the complementary uses surrounding the Project site, trip reduction factors are commonly applied to the base ITE trip generation rates. LADOT has incorporated into the VMT Calculator customized trip reduction factors for individual projects based on their location and proximity to a mix of other land uses and transit facilities to more accurately reflect the trip generating profiles of projects within the City. As such, the Project's daily trip generation estimated by the LADOT's VMT Calculator is lower than the trip generation estimates outlined in the comment letter that are based on straight application of the ITE rates. Further information regarding the LADOT's development of the VMT Calculator and various trip reduction factors can be found in the *City of Los Angeles VMT Calculator Documentation* (May 2020).

As outlined in the TAG, LADOT has determined that projects that generate fewer than 250 net daily trips can be considered small-scale developments and can be assumed to have a less-than-significant VMT impact. This aligns with the guidance provided by the State of California Office of Planning and Research's (OPR's) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018), which states that small projects can be screened from having to conduct additional VMT analysis. OPR provides flexibility to local jurisdictions on the threshold for determining projects that can be considered small-scale. Therefore, based on the LADOT's TAG and the daily trip generation calculations performed using the LADOT's VMT Calculator, and discussed above, the Project's daily trip generation falls below the established threshold of 250 net daily trips. Thus, the Project can be considered to have a less-than-significant VMT impact. The daily trip generation calculations and VMT analysis conclusions were reviewed and approved by the LADOT in an assessment letter dated March 3, 2020.

COMMENT 2 – SUBSTANTIALLY INCREASING ROADWAY HAZARDS

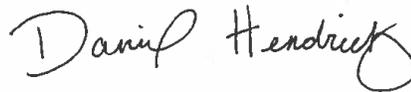
The second comment provided in the letter dated February 25, 2021 references the analysis of whether the Project substantially increases hazards due to geometric design features or an incompatible use. Per the TAG, the analysis of roadway hazards is required if the Project proposes new driveways or introduces new vehicular access to the property from the public right-of-way or if the Project proposes to, or is required to, make modifications to the public right-of-way. The comment letter suggests that new vehicular access would be introduced to the Project site along the alley. However, based on a review of the existing site plan, an existing driveway located near the southeast corner of the Project site provides access to a small parking and trash enclosure area. This driveway would be maintained and would be used for access to the subterranean level of the Project parking garage. Therefore, the Project is not introducing new driveways or vehicular access points to the existing site.

Despite not introducing new driveways or vehicular access points to the Project site, a review of potential hazards created by the construction of the Project was conducted as part of the TA, since the Project meets the second screening criteria by providing a roadway dedication along Temple Street. This review of roadway hazards determined that the Project would improve safety at the driveway along Temple Street by restricting right-turn-in/right-turn-out only movements at this location. This driveway currently operates

as a full access driveway. Additionally, the driveway along the alley would be maintained as a full-access driveway, since conflicting vehicular volumes along the alley are relatively low. This driveway provides sufficient space between the edge of the alley and the first parking space in which exiting vehicles can queue without interfering with the operation of the parking areas. Further, the gate to the parking area for the outbound portion of this driveway is set back from the edge of the alley, which will enable exiting motorists to better identify oncoming traffic along the alley to both the north and the south. Therefore, upon Project completion, the operations of both Project driveways are not anticipated to substantially increase hazards to the surrounding roadway network.

Please contact me if you have any questions.

Sincerely,



Daniel Hendricks, EIT
Associate Transportation Planner

DH
C22714