

February 25, 2021

Mr. Stephen Allen Jamieson
SOLOMON SALTSMAN & JAMIESON
426 Culver Boulevard
Los Angeles, CA 90293

Subject: Review of Traffic Conditions as Contained in the 1614 West Temple Street Project Findings Supporting a Categorical Exemption, City of Los Angeles Department of City Planning

Dear Mr. Jamieson:

RK ENGINEERING GROUP, INC. (RK) has reviewed the traffic evaluation and findings prepared for the 1614 West Temple Street project as contained in the document titled *1614 West Temple Street Project Findings Supporting a Categorical Exemption (Eco Tierra Consulting, Inc., June 2020)* and provides the following comments.

Projects that exceed 250 trips per day require a more substantive level of analysis than that which appears to have occurred here. It appears that the underlying basis of the analysis performed and impact findings rely upon the conclusion and finding that the project's daily trip generation is 247 trips per day. Since that is only 3 trips per day less than the threshold of 250 which, if exceeded, requires a greater analysis, we recommend a thorough review of the data upon which that 247 is based. A greater analysis of potential roadway hazards may be necessary since the proposed project may exceed the daily trip threshold of 250 vehicles. This is too important and too close to exceeding the threshold to disregard the need for a thorough peer review of the underlying data.

The underlying bases and data for the conclusions reached by the applicant could be erroneous and is not provided in the report. We recommend that the city require the applicant to provide such underlying data so that the undersigned and city staff may make further inquiry to confirm accuracy and the impact of this project, as designed, on the surrounding uses.

The Project proposes the demolition of the Project Site's existing commercial structures and surface parking lot, and the construction, use and maintenance of an approximately 47,000 square-foot mixed-use building containing 72 residential dwelling units (including seven affordable units), approximately 700 square feet of ground floor retail space, approximately 5,794 square feet of open space, and associated parking facilities providing up to 72 automobile parking spaces and 66 bicycle parking spaces at the 17,059-square-foot (0.39-acre) Project Site. Nine percent of the proposed dwelling units (seven dwelling units) would be Affordable Housing. The proposed building would be up to 85 feet (six stories) tall and would include a two-level, at-grade and subterranean parking garage.

Please see the 2 comments below:

Comment 1:

Within the reviewed document, it appears the main criteria and basis for the level of transportation analysis that has been conducted and its related findings revolves around the argument that the project's net daily trips are expected to be less than the 250 daily trip threshold established by the City for requiring a more substantial level of analysis.

Page III-18 of the report and study estimates the project's daily trip generation to be approximately 284 trips per day based on calculations conducted utilizing the LADOT's Vehicle Miles Traveled (VMT) Calculator Version 1.1.

The report also states that after accounting for the project and the site characteristics such as the number of parking spaces and proximity to transit, the project is expected to generate approximately 247 trips per day, without accounting for the existing land use that will be displaced.

However, the report that was reviewed did not appear to include any calculation sheets or printouts showing the detailed analysis and calculations resulting in the 247 daily trips estimated by the VMT Calculator.

Based on the City's guidelines, the level of analysis required for a project is significantly dependent on the number of daily trips generated by each project. Projects that generate more than 250 net daily trips require a more substantial level of analysis.

Hence, if the proposed project generates more than 250 net daily trips, a more detailed level of analysis would be required.

RK has conducted an estimation of the project trips for comparison, utilizing the Institute of Transportation Engineers (ITE) trip generation rates for multi-family use. The publication is utilized as an industry standard for estimation of trips for various land uses.

Based on the ITE trip generation rates, 72 dwelling units of mid-rise multi-family residential, would generate approximately 320 daily trips.

700 square feet of general retail use would generate an additional 26 daily trips, bringing the daily trip generation for the proposed uses to approximately 346 trips per day.

This trip generation estimate based on ITE rates is significantly higher than what has stated to be generated by the VMT Calculator.

Comment 2:

Page III-22 of the report states:

"If either of the following conditions is present for a proposed development project, then a further analysis of the potential roadway hazards is required:

- 1. The Project proposes new driveways, or introduces new vehicular access to the property from the public right-of-way.*
- 2. The Project proposes to, or is required to, make modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.).*

The access to the Project Site would be limited to the existing driveways along West Temple Street and the alley south of West Temple Street. Therefore, the Project would not introduce any new vehicular access points to the site."

This statement and finding from the report, quoted above, does not appear accurate since the proposed project does introduce a new access to the site via the alley.

RK appreciates the opportunity to provide a peer review and assist you on this project. If you have any questions regarding this letter, please call me at (949) 474-0809.

Respectfully submitted,
RK ENGINEERING GROUP, INC.



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Principal

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