

Communication from Public

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Comments for Public Posting: Please see the attached letter from the Applicant's representative, Andrew Brady of DLA Piper. Part 3 of 3 documents attached.

Revised Cumulative Analysis

The additional potential related projects would not change the characteristics of the Project Site, or its lack of value as habitat for endangered, rare, or threatened species. Like the Project, the potential related projects would be required to conduct pre-construction surveys of all potential nesting habitat in the area of construction disturbance in accordance with the City's standard conditions of approval and in compliance with applicable regulatory standards. Therefore, even in conjunction with the potential related projects, the Project would not cause a cumulatively considerable contribution to any significant cumulative impacts on biological resources.

Traffic

The Class 32 Categorical Exemption memorandum, August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson Transportation Consulting, Inc, 2018), and July 2019 *Supplemental Analysis for the 806 W. Adams Boulevard* (Gibson Transportation Consulting, Inc, 2019) concluded that the Project would not result in a significant impact at any of the six intersections within the study area. The studies also concluded that the Project would not have a significant impact on the regional freeway, arterial, or regional transit system. Therefore, the Class 32 Categorical Exemption memorandum and the 2019 Supplemental Environmental Analysis determined that the Project would not contribute to a significant cumulative traffic impact.

Revised Cumulative Analysis

On July 30, 2019, the City adopted the City of Los Angeles CEQA Transportation Thresholds. The thresholds include using vehicle miles travelled (VMT) as a criterion to determine transportation impacts pursuant to Senate Bill (SB) 743 and changes to CEQA Guidelines Section 15064.3, which establish that vehicle delay, or level of service (LOS), is no longer considered a significant impact on the environment. The Class 32 Categorical Exemption memorandum, August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson Transportation Consulting, Inc, 2018), and July 2019 *Supplemental Analysis for the 806 W. Adams Boulevard* (Gibson Transportation Consulting, Inc, 2019), all of which predate the adoption of the City's CEQA Transportation Thresholds, included an LOS-based analysis of the Project's traffic impacts. In accordance with current State and local requirements for evaluating transportation impacts under CEQA, a VMT-based cumulative impact analysis is provided below. An updated LOS-based cumulative impact analysis is also provided for informational purposes, but not as a basis for determining the significance of the Project's potential cumulative impacts under CEQA.

Cumulative VMT Analysis

As provided in the September 2021 *806 W. Adams Supplemental Traffic Analysis*, which is included in Attachment A, the daily vehicle trips and daily VMT expected to be generated by the Project were forecast using the City's VMT Calculator tool (Gibson Transportation Consulting, Inc., 2021). Copies of the City of Los Angeles VMT Calculator worksheets for the Project are included in Attachment A. As indicated therein:

- The Project is estimated to generate a total of 2,475 daily vehicle trips.
- The Project is estimated to generate a total of 14,921 daily VMT.
- The Project is estimated to generate 5.6 household VMT per capita,¹ which is less than the South Los Angeles significance threshold of 6.0 household VMT per capita.

Therefore, the Project's VMT impacts would be less than significant, and no mitigation measures are required. Each related project would be required to analyze their respective project's impacts relating to

¹ Based on home-based production trips only.

VMT. Each related project would be required to implement mitigation measures should their project exceed the VMT threshold. Long-term, or cumulative, effects are determined through a consistency check with the Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS). The 2020-2045 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) emissions reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG emissions goals. Projects that are deemed to be consistent have a less than significant cumulative impact on VMT under the City's VMT methodology, as noted in the City's Transportation Assessment Guidelines (TAG) (LADOT 2020). Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City's TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact (LADOT 2020). Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS (LADOT 2020). The Project thus falls under the City's efficiency-based impact thresholds and would align with SCAG's RTP/SCS for long-term VMT and GHG reduction goals. Therefore, the Project would not contribute to a cumulative VMT impact related to daily vehicle trips. Therefore, the Project's impacts related to VMT would not be cumulatively considerable, and cumulative transportation impacts from the Project in conjunction with the Potential Related Projects would be less than significant.

Cumulative LOS Analysis (For Informational Purposes)

The Project transportation consultant analyzed the potential for traffic-related effects resulting from the additional related projects (Gibson Transportation Consulting, Inc., 2021). The results of the analysis are included in Attachment A. The analysis shows that the additional related projects would generate 6,901 net new daily vehicle trips, including 438 A.M. peak hour trips and 533 P.M. peak hour trips. The supplemental analysis evaluated the effect of these trips within the Project study area, which includes six study intersections under Future With Project (i.e., Cumulative) Conditions. Under Future with Project Conditions, the supplemental analysis determined that incremental traffic increases resulting from the potential related projects would not change the future LOS at any study intersection compared to Future Without Project Conditions. Therefore, the results of the August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson Transportation Consulting, Inc, 2018) and July 2019 *Supplemental Analysis for the 806 W. Adams Boulevard* (Gibson Transportation Consulting, Inc, 2019) would not change with the additional related projects.

Noise

The Class 32 Categorical Exemption, August 2018 *Environmental Noise Study for the 806 W Adams Residential Project* (ICF, 2018), and 2019 Supplemental Environmental Analysis concluded that the Project would comply with applicable LAMC noise regulations with proposed noise control methods incorporated into the construction process and Project design and operations. Project construction activities would occur within the permitted hours established in LAMC Section 41.40, and noise levels generated from construction equipment would not exceed the maximum noise level at noise-sensitive receptors located off-site after implementation of noise control methods in accordance with LAMC Section 112.05. During operations, the incorporation of noise control methods by the Project would ensure that all noise-generating mechanical equipment would comply with the requirements of LAMC Section 112.02, and that noise from the Project's outdoor residential amenity spaces would comply with noise limits set forth in the LAMC. Additionally, groundborne vibration generated from the operation of heavy

construction equipment at the Project Site would not reach levels that would result in building damage or human annoyance at off-site structures under widely-used standards produced by Caltrans. Furthermore, as a residential development the Project would not have any major sources of vibration during daily operations. Therefore, the Project was determined to not result in any significant contribution to cumulative noise or groundborne vibration impacts.

Revised Cumulative Analysis

The closest Potential Related Project (Related Project 3) is 0.23 miles from the Project site; the remaining additional Potential Related Projects are located at greater distances. All the Potential Related Projects are separated from the Project site by numerous buildings that would act as intervening noise barriers within an urban environment many different sources of existing ambient noise. These factors (distance and acoustical shielding from buildings and ambient noise) would substantially reduce any construction or operational noise or groundborne vibration propagating from the Potential Related Projects in conjunction with the Project, such that the resulting noise and vibration levels at the Project site and surrounding properties would be negligible. As indicated, there would be no change in Project-generated construction and operational noise levels than those previously analyzed and, as a result of the non-contribution of construction noise from Potential Related Projects in the affected area around the Project site, on-site Project activities would not result in any significant contribution to cumulative noise or groundborne vibration impacts.

Regarding operational cumulative noise impacts, the Potential Related Projects would result in changes to future traffic conditions in the Project vicinity and thus create the potential for cumulative off-site noise impacts operating in conjunction with the Project. To assess these impacts, future traffic noise levels were reevaluated based on the updated cumulative traffic volumes that included the Potential Related Projects (Gibson Transportation Consulting, Inc., 2021). The updated cumulative traffic noise analysis results are summarized in Table 2. Comparing the results to those in the 2018 Environmental Noise Study (ICF, 2018), all analyzed future traffic noise levels would change by 0.1 decibel (dB) or less, which is imperceptible to the human ear. As shown in Table 2, the Project's contribution to cumulative traffic noise increases would be 0 to 0.1 dB; this change would also be imperceptible to the human ear. Therefore, the Project would not result in any significant contribution to cumulative traffic noise impacts.

Air Quality

As discussed in the Class 32 Categorical Exemption memorandum, August 2018 *Air Quality Analysis for the 806 W. Adams Residential Project* (ICF, 2018), and July 2019 *Supplemental Environmental Analysis for the 806 W. Adams Boulevard Residential Project* (ICF, 2019), Project construction would generate criteria pollutants, ozone precursor pollutants, and small amounts of Toxic Air Contaminants (TACs); however, such emissions would not exceed South Coast Air Quality Management District (SCAQMD) regional mass emissions thresholds or localized significance thresholds. Project operation would also generate criteria pollutant and ozone precursor pollutants. However, emissions from long-term operations were determined not to exceed the SCAQMD regional mass emissions thresholds or localized significance thresholds, or create a Carbon Monoxide (CO) hot spot. The Project was also determined to be consistent with the SCAQMD 2016 Air Quality Management Plan (AQMP), as it is consistent with AQMP growth assumptions and SCAG's regional growth forecast and smart growth policies and objectives. Because the AQMP and applicable SCAQMD air quality standards for individual projects are set at levels that would attain meeting air quality standards in the basin even with projected growth, projects that are consistent

Table 2. Updated Predicted Cumulative Traffic Noise Levels

Roadway/Segment	Estimated Traffic Noise Levels at 50 feet from Roadway Centerline (dB CNEL)				
	Existing (Baseline) ^a	Future without Project	Future with Project	Increase over Existing (Cumulative)	Increase over Future without Project
23rd Street					
West of Hoover Street	58.3	58.4	58.4	0.1	0.0
East of Hoover Street	59.3	59.5	59.5	0.2	0.0
Adams Boulevard					
West of Vermont Avenue	67.3	68.0	68.0	0.7	0.0
East of Vermont Avenue	67.8	68.4	68.4	0.6	0.0
West of Hoover Street	67.7	68.3	68.3	0.6	0.0
East of Hoover Street	67.3	67.9	68.0	0.7	0.1
West of Figueroa Street	67.2	67.8	67.8	0.6	0.0
East of Figueroa Street	67.0	68.2	68.2	1.2	0.0
West of Grand Avenue	65.9	67.8	67.8	1.9	0.0
East of Grand Avenue	65.7	67.2	67.2	1.5	0.0
30th Street					
West of Hoover Street	61.5	61.8	61.9	0.4	0.1
East of Hoover Street	61.0	61.3	61.3	0.3	0.0
Vermont Avenue					
North of Adams Boulevard	68.3	69.1	69.1	0.8	0.0
South of Adams Boulevard	68.1	69.1	69.1	1.0	0.0
Hoover Street					
North of 23 rd Street	68.4	68.8	68.8	0.4	0.0
South of 23 rd Street	67.8	68.3	68.3	0.5	0.0
North of Adams Boulevard	68.6	69.0	69.0	0.4	0.0
South of Adams Boulevard	67.9	68.2	68.3	0.4	0.1
North of 30 th Street	67.6	67.9	68.0	0.4	0.1
South of 30 th Street	66.2	66.5	66.5	0.3	0.0
Figueroa Street					
North of Adams Boulevard	68.2	69.9	69.9	1.7	0.0
South of Adams Boulevard	68.0	69.9	69.9	1.9	0.0
Grand Avenue					
North of Adams Boulevard	65.9	68.7	68.7	2.8	0.0
South of Adams Boulevard	65.8	67.7	67.7	1.9	0.0

^a Existing (baseline) noise levels are included for reference but did not change.

dB = decibels

CNEL = Community Noise Equivalent Level

with the AQMP, and thus consistent with SCAG growth projections and air quality standards, are determined in accordance with SCAQMD guidance to not result in significant cumulative impacts.² Therefore, the Project would not contribute to a significant cumulative air quality impact.

Revised Cumulative Analysis

The Potential Related Projects have no effect on the development intensity of the Project relative to what was previously analyzed and disclosed in the 2018 Class 32 Categorical Exemption and 2019 Supplemental Environmental Analysis. Accordingly, there would be no change in Project-generated construction or operational emissions. Ozone precursors and criteria pollutants would remain under SCAQMD daily emission thresholds, and therefore would not be cumulatively considerable.

While Project-generated traffic volumes would not change under the revised cumulative analysis, additional development in the vicinity of the Project would increase cumulative traffic volumes, potentially worsening congestion and associated localized CO concentrations. However, even with the proportionate increase in background traffic volumes that would result from the Potential Related Projects compared to the analysis of CO concentrations presented in the August 2018 *Air Quality Analysis for the 806 W. Adams Residential Project* (2018 Air Quality Memo), cumulative CO concentrations under the revised cumulative analysis would remain below the ambient air quality standards. Specifically, as discussed in the 2018 Air Quality Memo, CO hot-spot modeling conducted by SCAQMD for their 2003 AQMP demonstrates that the most heavily congested intersection in Los Angeles County, which has an average daily traffic volume of approximately 100,000 vehicles per day, would violate the CO ambient air quality standards. The highest daily traffic volumes generated at the roadways within the vicinity of the Project caused by the Project and Potential Related Projects would be a cumulative total of 59,035 vehicles per day. This maximum cumulative figure applies to all daily combined trips on all road segments and intersections, not the maximum at any one intersection. This total number is approximately only 59 percent of the vehicles per day at the busiest intersection in the 2003 AQMP's CO hot spots analysis. Accordingly, the Project would not create a CO hot-spot under the revised cumulative analysis. Therefore, with the addition of the related projects, the Project would not contribute to a significant cumulative air quality impact.

Water Quality

As discussed in the Class 32 Categorical Exemption memorandum and 2019 Supplemental Environmental Analysis, a minimum of 25 percent of exterior the open space areas would be planted with ground cover in accordance with the LAMC. Project construction would include Best Management Practices (BMPs) set forth in a stormwater pollution prevention plan (SWPPP) in accordance with the State Stormwater NPDES Construction General Permit administered by the State Water Resources Control Board (SWRCB), compliance with which would be regulated by the Los Angeles Regional Water Quality Control Board. The Project would also comply with LAMC provisions related to stormwater and urban runoff pollution and Low Impact Development (LID) strategies. applicable to all projects that require building permits, and the Project applicant would be required to prepare and implement a stormwater mitigation plan and incorporate stormwater mitigation measures into the design plans for review and approval by the City Department of Building and Safety before a building permit for the Project is issued. As a result of compliance with these regulatory requirements, the Project was determined not to result in the

² See South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D, at p. D-3. <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>

degradation of stormwater runoff and would not result in significant impacts relating to water quality. Therefore, the Project would not contribute to a significant cumulative water quality impact.

Revised Cumulative Analysis

The addition of the related projects to the Project's cumulative analysis would not change the Project's characteristics, such as the total open space to be provided on site and the commitment to plant 25 percent of exterior the open space areas with ground cover. The Project would continue to comply with all requirements related to the protection of water quality during construction and operation of the Project, including a SWPPP and City LID Ordinance compliance requirements. Given their respective distances from the Project site, the majority of the Potential Related Projects, with the possible exception of Related Project 3, would be served by different storm drains than the Project. Like the Project, each of the Potential Related Projects would be required to comply with applicable regulatory standards and requirements. Therefore, in conjunction with the Potential Related Projects, the Project would not contribute to a significant cumulative impact on water quality.

Summary and Conclusions

Based on analysis of the of the potential cumulative impacts caused by the Potential Related Projects, and considering the less-than-significant impacts that would result from the Project, the Project would not make a cumulatively considerable contribution to any significant cumulative impacts when considering it along with other related past, present, and reasonably foreseeable future projects, including the Potential Related Projects. The revisions to the cumulative analysis would not change the conclusions presented in the Class 32 Categorical Exemption memorandum prepared for the Project by ICF on October 5, 2018, as amended by the 2019 Supplemental Environmental Analysis. As such, the Project qualifies for a Class 32 Categorical Exemption.

References

- California Natural Diversity Database. 2018. Plant and Animal Occurrences within 2 Miles of Project Site.
- Gibson Traffic Consulting, Inc. 2018. Traffic Impact Study for the Proposed Residential Development at 806 West Adams Boulevard.
- Gibson Traffic Consulting, Inc. 2019. Supplemental Analysis for 806 West Adams Boulevard, Los Angeles, California.
- Gibson Traffic Consulting, Inc. 2021. 806 W. Adams Supplemental Traffic Analysis, Los Angeles, California.
- Historic Resources Group. 2018. Phase 1 Historical Resource Assessment Report for 806 W. Adams Blvd.
- ICF. 2018. Limited Phase I Environmental Site Assessment for the 806 W. Adams Residential Project.
- ICF. 2018. Air Quality Analysis for the 806 W. Adams Residential Project.

ICF. 2018. Environmental Noise Study for the 806 W Adams Residential Project.

ICF. 2019. Supplemental Environmental Analysis for the 806 W. Adams Boulevard Residential Project.

LADOT. 2020. Transportation Assessment Guidelines. July 2020. Available:
https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf. Accessed: September 7, 2021.

ATTACHMENT A: SUPPLEMENTAL TRAFFIC ANALYSIS



CONFIDENTIAL DRAFT

MEMORANDUM

TO: City of Los Angeles Department of City Planning

FROM: Sarah M. Drobis, P.E., and David Roachford

DATE: September 14, 2021

RE: 806 W Adams Supplemental Traffic Analysis
Los Angeles, California

Ref: J1578a

Gibson Transportation Consulting, Inc. (GTC) was asked to conduct a supplemental traffic analysis based on review of the list of additional development projects provided by the Los Angeles Department of City Planning (City Planning) as part of the appeal process for the 806 W. Adams Street Project (Project). This memorandum summarizes our review and the related traffic analyses.

BACKGROUND

GTC prepared a Transportation Impact Study and a Supplemental Transportation Analysis in June 2018 and July 2019, respectively (collectively referred to herein as Transportation Study) analyzing the potential project-level and cumulative transportation impacts on the Project. The Los Angeles Department of Transportation (LADOT) approved the Transportation Study and issued an approval letter dated August 29, 2018, and an update dated July 23, 2019.

Subsequently, City Planning provided a list of potential development projects (Related Projects) undergoing environmental review (Exhibit A of the City Planning appeal response letter dated August 12, 2021). GTC reviewed the list and compared it to the list of Related Projects considered in the approved Transportation Study. Based on the comparison, GTC determined that two of the nine Related Projects had been previously considered as part of the Transportation Study. The remaining seven projects on the list were conservatively considered to be within the study area to provide a worst-case analysis.

GTC updated the list of Related Projects and prepared a supplemental cumulative operational traffic analysis to confirm the impact conclusions of the Transportation Study are still valid. The approved Transportation Study measured potential transportation impacts using the previous metric of level of service (LOS), which as of July 2020 is no longer valid but was analyzed in this memorandum for informational purposes only. This memorandum also provides an analysis of the Project's potential project-level and cumulative impacts under the current vehicle miles traveled (VMT) metric, as required by *Transportation Assessment Guidelines* (LADOT, Updated August 2021) (TAG).

UPDATED RELATED PROJECTS LIST

As discussed above, City Planning provided a list of development projects within the University Park area, shown in Table 1. GTC updated the list of Related Projects (which was originally provided in Table 6 of the Transportation Study) to include these additional developments and reanalyzed the future conditions for potential cumulative impacts. The full Related Projects list, including these additional Related Projects, is provided in Table 2.

Figure 1 illustrates the locations of the updated Related Projects. Figure 2 illustrates the peak hour traffic volumes of the updated Related Projects at study intersections. Figure 3 illustrates the peak hour traffic volumes under Future without Project Conditions. Figure 4 illustrates the peak hour traffic volumes under Future with Project Conditions.

OPERATIONAL ANALYSES UTILIZING LOS METRIC (INFORMATIONAL PURPOSES ONLY)

Similar to the analysis presented in the Transportation Study, the Future without Project Conditions present a “baseline” future condition for a cumulative impact analysis of the Project. To determine this condition, traffic volume forecasts illustrated in Figure 3 were developed by applying an ambient growth rate of 1% per year compounded annually to account for growth in traffic over Existing Conditions and by adding the updated Related Projects traffic volumes illustrated in Figure 2. This is a conservative approach as many of the Related Projects are already reflected in the ambient growth. To provide a conservative analysis, the Project buildout year was also extended to Year 2024, adding an additional three years of traffic growth.

Table 3 summarizes the operational impacts of Project traffic during the weekday morning and afternoon peak hours under future cumulative conditions with consideration of the updated Related Projects and additional ambient traffic growth. As shown, and consistent with the analysis and conclusions in the Transportation Study, the Project is not anticipated to result in a significant impact at any of the analyzed intersections under Future with Project Conditions, which presents a cumulative impact analysis of the Project.

In summary, including the additional Related Projects and ambient traffic growth in the operational analysis of the Project’s potential transportation impacts does not result in significant transportation impacts under the previously applicable LOS metric and, therefore, does not change the findings of the approved Transportation Study. The Project’s potential cumulative impacts remain less than significant, and no mitigation is required. Detailed analysis worksheets are provided in Attachment A.

VMT ANALYSES

Causing Substantial VMT

Threshold T-2.1 of the TAG analyzes whether a project causes substantial VMT and is generally applied to land use projects. Specifically, Threshold T-2.1 inquires whether a project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1), which states that (for land use projects) “vehicle miles travelled exceeding an applicable threshold of

significance may indicate a significant impact.” This subdivision also states that a lead agency has discretion to choose the most appropriate method to evaluate a project’s VMT.

Per Section 2.2.2 of the TAG, a “no impact” determination can be made for a project if either of the following screening criteria are not met for Threshold T-2:

- *T-2.1-1: Would the land use project generate a net increase of 250 or more daily vehicle trips?*
- *T-2.1-2: Would the project generate a net increase in daily VMT?*

VMT Methodology

The following describes the methodology by which vehicle trips and VMT are calculated in *City of Los Angeles VMT Calculator Version 1.3* (July 2020) (VMT Calculator), as detailed in *City of Los Angeles VMT Calculator Documentation* (LADOT and City Planning, May 2020). LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits.

As detailed in *City of Los Angeles VMT Calculator Documentation*, the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, and the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Governor’s Office of Planning and Research, December 2018).

Table 2.2-1 of the TAG details the following daily household VMT per capita and daily work VMT per employee impact criteria for the Area Planning Commission (APC) areas:

APC	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

Source: TAG

The Project is located in the South Los Angeles APC.

Project VMT Analysis

The VMT Calculator was used to evaluate Project VMT for comparison to the VMT impact criteria. Based on guidance from LADOT, the VMT Calculator was modeled for the Project's land use and density as the primary input.

The VMT analysis results based on the VMT Calculator are summarized in Table 4.

As shown in Table 4 and Attachment B, the VMT Calculator estimates that the Project would generate 2,475 daily VMT. Thus, the Project would generate an average household VMT per capita of 5.6. The average household VMT per capita would not exceed the South Los Angeles APC significant household VMT per capita impact threshold of 6.0 and, therefore, the overall Project would not result in a significant VMT impact, and no mitigation measures would be required.

The detailed output from the VMT Calculator is provided in Appendix B.

Cumulative VMT Analysis

Cumulative effects of development projects are determined based on the consistency with the air quality and greenhouse gas (GHG) reduction goals of *Connect SoCal – 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy* (Southern California Association of Governments, Adopted September 2020) (RTP/SCS) in terms of development location, density, and intensity. The RTP/SCS presents a long-term vision for the region's transportation system through Year 2045 and balances the region's future mobility and housing needs with economic, environmental, and public health goals.

As detailed in the TAG, for projects that do not demonstrate a project-level impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient to demonstrate no cumulative VMT impact, as projects shown to be under the applicable project-level VMT metric also demonstrate compliance with the long-term regional VMT and GHG reduction goals of the RTP/SCS.

This Project would not result in a significant VMT impact, as described above. Therefore, the Project is not anticipated to result in a cumulative VMT impact under Threshold T-2.1, and no further evaluation or mitigation measures would be required.

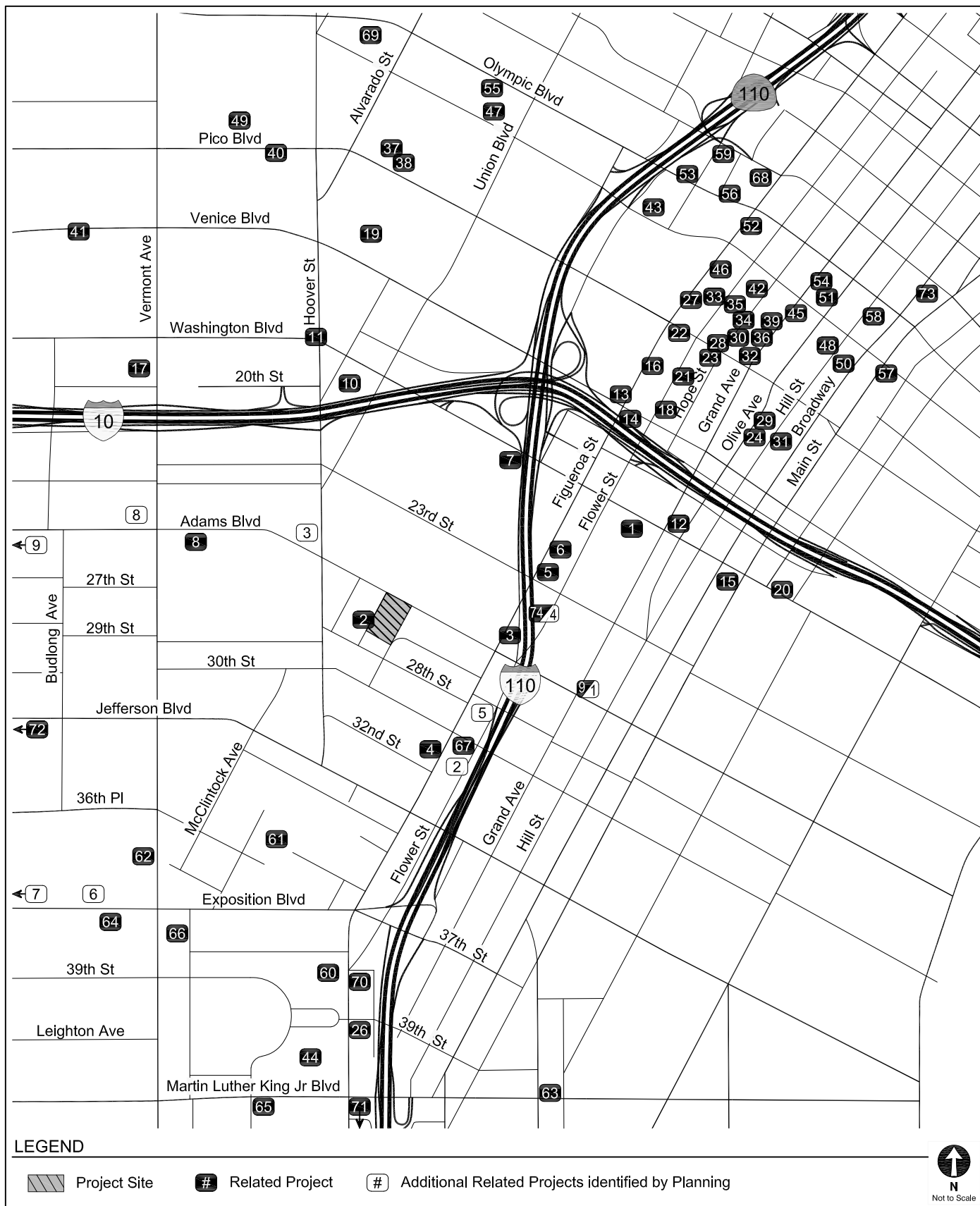
Furthermore, the Project site and study area are well-served by multiple transit options. The Project would also contribute to the productivity and use of the regional transportation system by providing housing near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with RTP/SCS goals. Thus, the Project encourages a variety of transportation options and is consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region.

CONCLUSION

As described above, the results of this supplemental analysis are consistent with the analysis and conclusions in the Transportation Study. No study intersections would be significantly impacted in the Future Conditions under the prior LOS metric, consistent with the results of the Transportation Study.

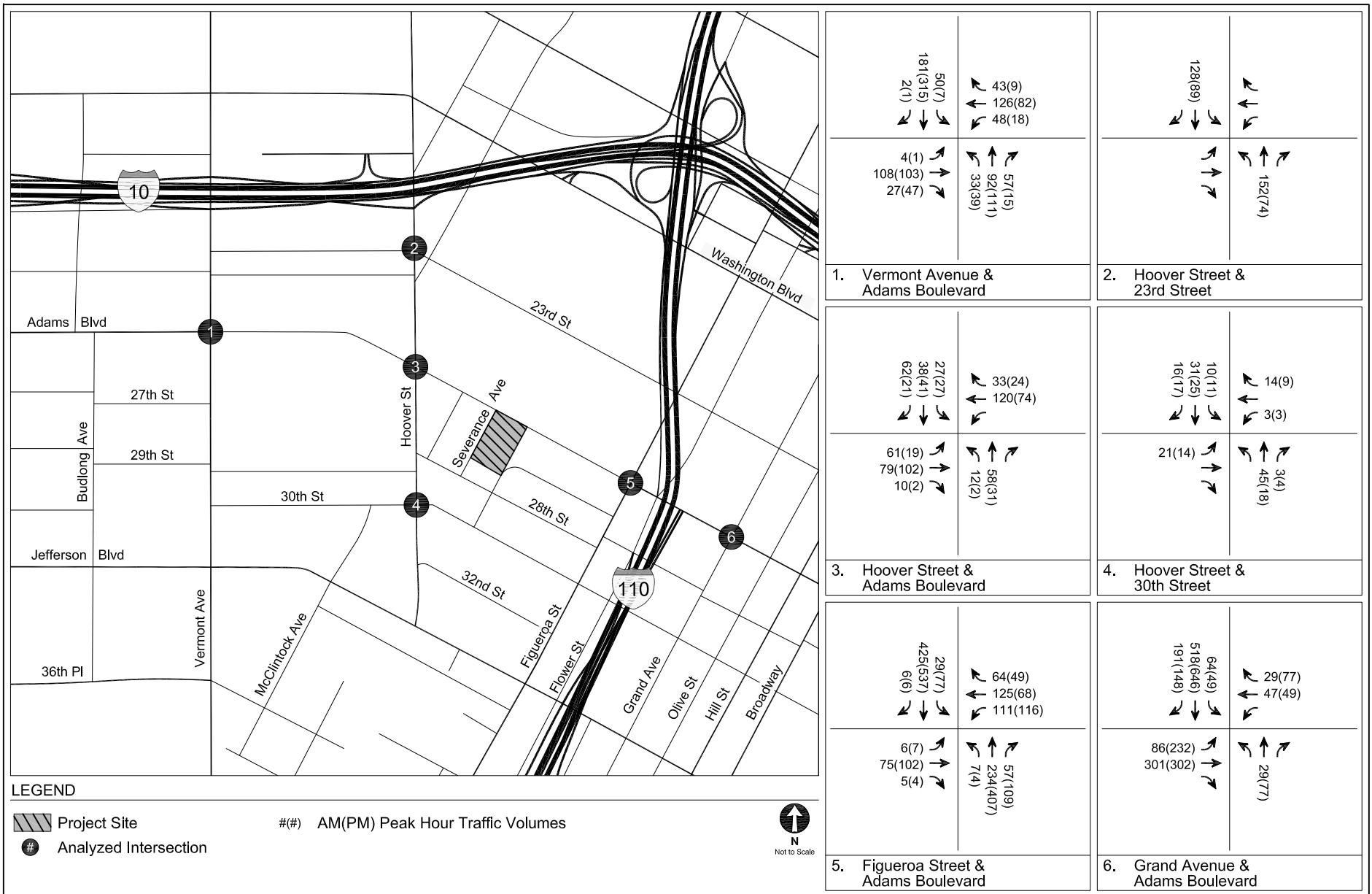
In addition, the Project's potential cumulative VMT impacts would be less than significant as the Project is below the 6.0 household VMT per capita threshold for the South Los Angeles APC.

Therefore, the supplemental analysis of the traffic impacts under Future with Project Conditions does not result in any new significant cumulative transportation impacts or materially different transportation impacts than were previously analyzed, and the conclusions presented in the Transportation Study are still valid.



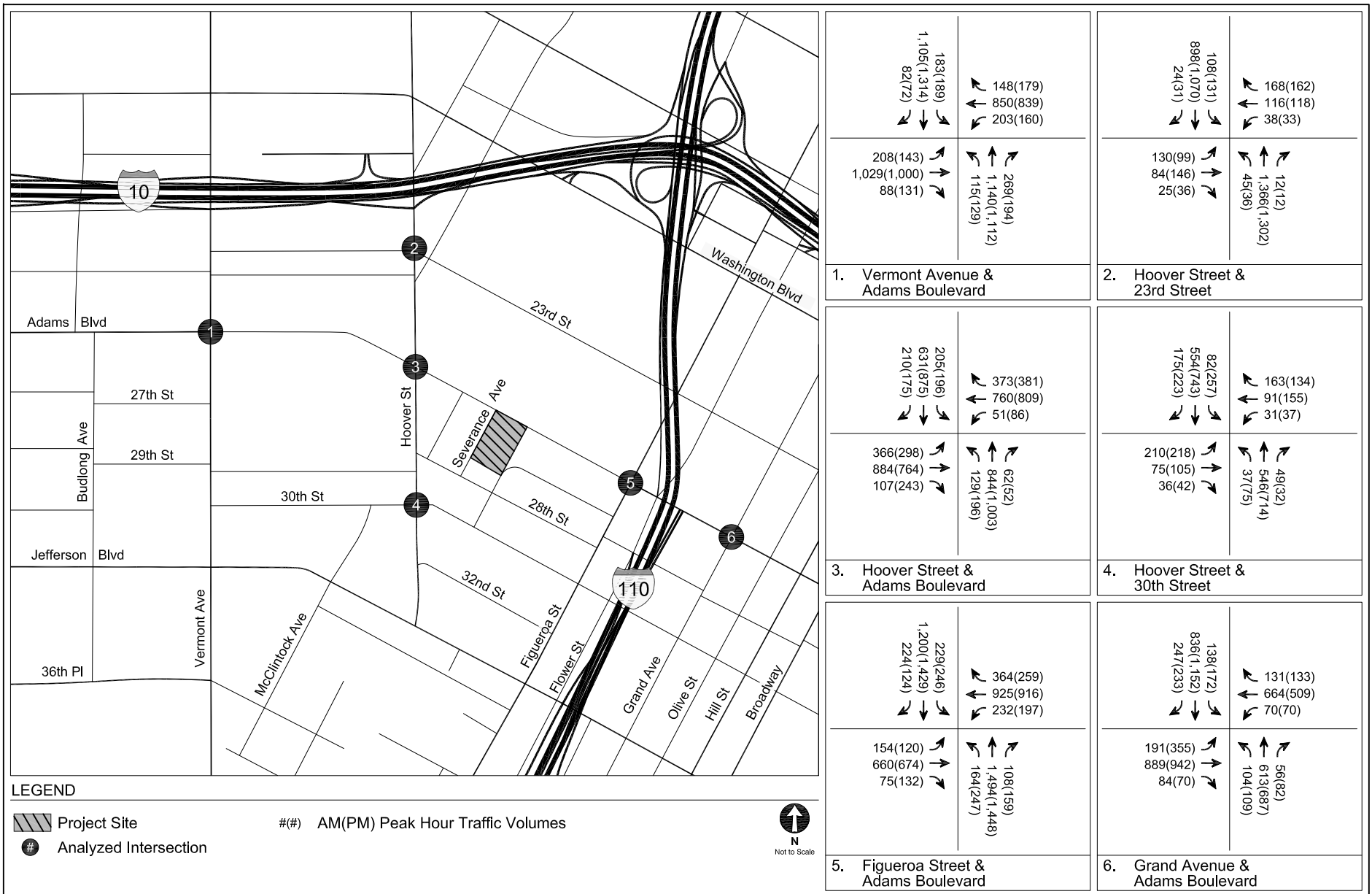
LOCATIONS OF RELATED PROJECTS

FIGURE
1



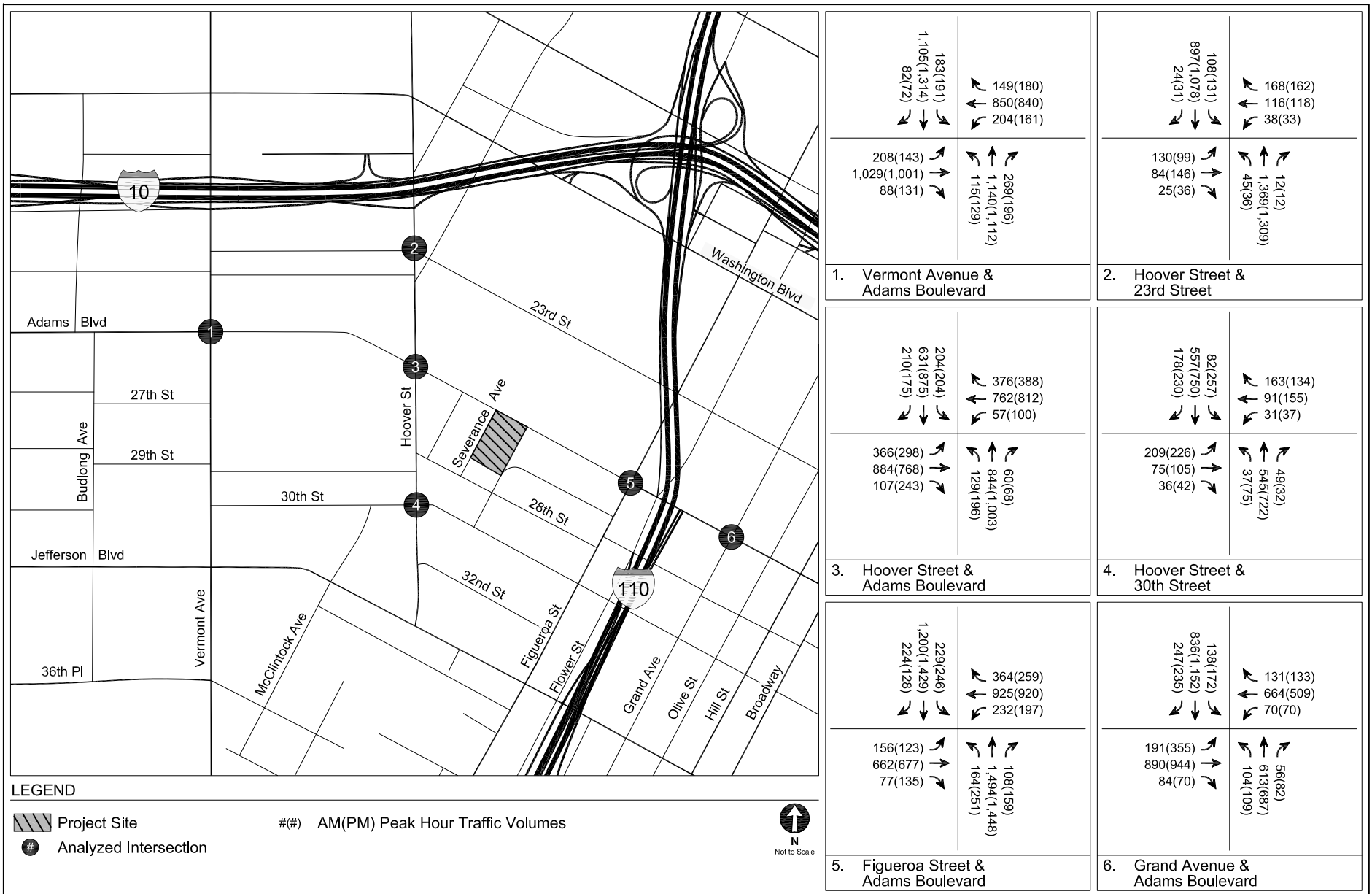
RELATED PROJECT-ONLY
PEAK HOUR TRAFFIC VOLUMES

FIGURE
2



FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2024)
PEAK HOUR TRAFFIC VOLUMES

FIGURE
3



FUTURE WITH PROJECT CONDITIONS (YEAR 2024)
PEAK HOUR TRAFFIC VOLUMES

FIGURE
4

TABLE 1
ADDITIONAL RELATED PROJECTS
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates [a]						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
1 [b]	Mixed-Use	243 W Adams Blvd	296 apartments	2,167	31	105	136	105	61	166
2 [c]	USC Student Housing	505 W 31st St	73 apartment units	380	7	23	30	23	13	36
3 [d]	2595 S Hoover St	2595 S Hoover St	46 townhomes	337	5	16	21	16	10	26
4	2321 S Flower St	2321 S Flower St	280 apartments	2,050	30	99	129	99	58	157
5	2813 S Flower St	2813 S Flower St	47 hotel rooms	393	13	9	22	14	14	28
6	1069 W Exposition Blvd	1069 W Exposition Blvd	52 apartments	381	6	18	24	18	11	29
7	1265 W Exposition Blvd	1265 W Exposition Blvd	108 apartments	791	12	38	50	38	22	60
8	1421 W Adams Blvd	1421 W Adams Blvd	45 apartments	329	5	16	21	16	9	25
9	1840 W Adams Blvd	1840 W Adams Blvd	10 small lot townhomes	73	1	4	5	4	2	6

Notes:

[a] Additional related projects identified by LADCP in Appeal of ENV-2018-2454-CE; CF 19-1603-S1. Trip Generation Estimates based on Trip Generation, 10th Edition, Institute of Transportation Engineers, 2017.

[b] #9 in project list. Project description changed from LADOT list

[c] #67 in project list. Same as before, clarified its 73 units

[d] Built and occupied

TABLE 2
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
Initial Related Projects Submitted										
1	LA Trade Tech College	400 W Washington Bl	6,300 students	--	101	38	139	172	80	253
2	USC Children's Creative Learning Center	2716 S Severance St	9,955 sf child care center	737	64	57	121	58	65	123
3	Apartment Project (Figueroa & Adams Student Housing)	2455 S Figueroa St	145 apartment units	870	8	51	64	54	28	82
4	Figueroa Hotel	3101 S Figueroa St	275 hotel rooms and 1,178 sf bar	1,167	48	33	81	48	51	99
5	2222 Figueroa	2222 S Figueroa St	1,063 condominium units and 18,000 sf retail	6,945	91	394	485	403	217	620
6	Mixed-Use	2100 S Figueroa St	291 condominium units and 7,134 sf retail	870	-82	66	-16	67	-28	39
7	Mixed-Use	720 W Washington Bl	105 senior apartment units and 2,650 sf retail	350	7	12	19	13	12	25
8	K-8 Charter School	1342 W Adams Bl	500 students	993	239	196	435	30	40	70
9	Mixed-Use	243 W Adams Bl	300 apartment units, 2,500 sf retail, and 2,500 restaurant	990	5	99	104	72	10	82
10	Medical Office	1122 W Washington Bl	60,000 sf office	2,060	107	29	136	57	146	203
11	Pharmacy / Drug Store	1302 W Washington Bl	16,572 sf drug store	414	-33	-18	-51	21	12	33
12	Mixed-Use	233 W Washington Bl	160 apartment units and 24,000 sf retail	1,764	25	56	81	89	71	160
13	Convention Center Modernization	NW Corner of Figueroa St & Venice Bl	Increase floor area by 37,799 sf	2,690	--	--	--	44	225	269
14	1600 S Figueroa	1600 S Figueroa	336 apartment units and 250 hotel rooms	4,227	112	191	303	212	146	358

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
15	The Reef - LA Mart/SOLA Village	1900 S Broadway	500 condominium units, 500 apartment units, 210 hotel rms, 143,100 sf retail, 180,000 sf office, 17,600 sf gallery/museum, and 8,000 sf auto	--	390	552	942	637	566	1,203
16	1400 S Figueroa Street Residential Project	1400 S Figueroa St	106 apartment units and 4,834 sf retail	647	10	38	48	39	22	61
17	1620 Cordova St Charter School	1620 W Cordova St	400 students	527	105	66	171	16	20	36
18	1370 S Flower St Residential	1410 S Flower St	152 apartment units and 1,184 sf retail	1,062	17	62	79	63	35	98
19	1420 Bonnie Brae Apartments	1420 Bonnie Brae St	26 apartment units	193	3	12	15	12	6	18
20	Washington Blvd Opportunity - Mercy housing	220 E Washington Bl	230 new apartment units, 32 renovated apartment units, and 19,000 sf retail/restaurant	2,113	38	118	156	125	53	178
21	Mixed-Use	1334 S Flower St	188 apartment units and 10,096 sf retail/restaurant	1,038	(3)	63	60	67	22	89
22	City Lights	1300 S Figueroa St	1,024 hotel rooms	9,134	398	288	686	351	366	717
23	SPR - Mixed-Use	1306 Hope St	419 apartment units and 42,000 sf retail	4,280	88	105	194	136	102	238
24	Mixed-Use	215 W 14th St	154 apartment units and 10,700 sf retail	1,481	22	67	89	81	54	135
25	1323 S Grand Ave	1323 S Grand Ave	284 apartment units and 6,300 sf commercial	2,158	33	118	151	126	74	200
26	The Fig	3900 S Figueroa St	298 hotel rooms, 52,614 sf retail/restaurant, 222 student housing units, 186 apartment units, and 16,910 sf office	8,327	307	281	588	372	304	676
27	Fig + Pico Conference Center Hotels	1248-1260 S Figueroa St	1,162 hotel rooms and 13,145 sf restaurant	5,720	192	125	317	203	212	415
28	SPR-Mixed-use Onyx West & East	1300 S Hope St	419 apartment units and 42,000 sf retail	4,280	88	105	193	136	102	238

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
29	14th & Olive Mixed-Use	1340 S Olive St	156 apartment units, 5,000 sf retail and 10,000 sf restaurant	1,700	51	82	133	89	57	146
30	Morrison Hotel	1246 S Hope St	258 high-rise apartments, 265 hotel rooms, and 6,000 sf retail	889	88	99	187	120	100	220
31	14th St/Hill St (DTLA) Mixed-Use	1340 S Hill St	233 apartment units	1,755	11	103	114	108	30	138
32	Apartments	1247 S Grand Ave	115 apartment units and 4,610 sf retail	763	10	41	51	42	25	67
33	Circa (1200 Figueroa Project)	1200 S Figueroa St	648 condominium units and 48,000 sf retail	7,344	231	159	390	284	283	567
34	1219 S Hope St	1219 S Hope St	75 hotel rooms and 2,650 sf retail	613	23	16	39	23	22	45
35	Flower Mixed-Use	1212 S Flower St	730 condominium units and 7,873 sf retail	3,956	78	233	311	229	121	350
36	Grand Residence	1229 S Grand Ave	161 condominium units and 3,000 sf restaurant	1,116	23	62	85	62	33	95
37	Laborers Local 300 Headquarters	2005 W Pico Blvd	30,300 sf office space and 4,500 sf assembly hall	224	28	4	32	5	25	30
38	Charter High School	1929 W Pico Bl	480 students	821	140	66	206	20	42	62
39	1201 S Grand Ave	1201 S Grand Ave	126 condominium units	732	9	46	55	44	22	66
40	2250-2270 W Pico Blvd Hotel	2250-2270 W Pico Blvd	125-room hotel	409	26	19	45	10	9	19
41	Self-Storage	1810 W Venice Bl	154,024 sf self-storage	385	12	10	22	20	20	40
42	Amacon Project	1133 S Hope St	208 condominium units and 5,029 sf retail	1,543	20	74	94	91	50	141

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
43	JW Marriott Headquarters Hotel and Conference Center Expansion	1005 W Chick Hearn Ct	170,000 sf conference/meeting space	5,174	207	107	314	205	214	419
44	LAFC	3939-3999 S Figueroa St	22,000-seat stadium, 82,000 sf commercial, and 25,000 sf office/conference	13,519	1,145	68	1,213	2,019	160	2,179
45	DTLA South Park Site 1, 1A	1120 S Grand Ave	666 apartment units and 20,690 sf retail	2,730	42	127	170	136	93	229
46	Fig Central	1101 S Flower St	504 condominium units, 183 hotel rooms, and 166,000 sf retail	11,512	190	282	472	527	461	988
47	1633 W 11th St Charter School (K-5)	1633 W 11th St	460 seats	970	194	158	352	29	37	66
48	11th & Hill Project	1115 S Hill St	172 condominium units and 6,850 sf restaurant	543	-45	40	-5	50	-7	43
49	Apartments	1255 E Elden Ave	93 apartment units	376	0	32	32	28	10	38
50	Mixed-Use (Herald Examiner)	1111 S Broadway	214 apartment units and 10,000 sf retail	5,198	144	176	319	258	274	532
51	1045 S Olive Street	1045 S Olive St	800 condominium units and 15,000 sf retail	5,289	69	297	366	306	166	472
52	LUXE Hotel Mixed-Use project	1020 S Figueroa St	435 condominium units, 300 hotel rooms, and 58,959 sf retail	4,859	150	199	349	228	169	397
53	Olympia Mixed-Use	1001 Olympic Bl	1,367 apartment units, 20,000 sf retail, and 20,000 sf restaurant	5,216	86	297	383	283	115	398
54	Restaurant	1036 S Grand Ave	7,149 sf restaurant	492	2	3	5	27	14	41
55	1700 W Olympic Hotel	1700 W Olympic Bl	160 hotel rooms	1,157	44	32	76	45	42	87
56	Olympic Tower	813 W Olympic Bl	374 condominium units, 373 hotel rooms, 33,498 sf office, 65,074 sf retail, and 10,801 sf conference center	4,423	166	170	336	189	185	374

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
57	Mixed-use	1100 S Main St	379 apartment units and 25,810 sf retail	385	9	103	112	78	14	92
58	Olympic & Hill Mixed Use	1030 S Hill St	700 apartment units, 7,000 sf retail, 7,000 sf restaurant	3,392	49	193	242	181	104	285
59	Downtown LA Hotel	926 James M Wood Bl	247 hotel rooms	1,592	59	42	101	59	56	115
60	California African American Museum	600 State Dr	Renovate 26,400 sf existing museum & construct 77,100 sf new space	154	14	1	15	2	34	36
61	USC University Park Master Plan			13,574	--	--	732	--	--	1,057
62	South LA Redevelopment 3A	3671 S Vermont Ave	80 apartment units and 50,000 sf retail	1,744	24	42	66	85	73	156
63	Accelerated Charter Elementary School	107 E Martin Luther King Jr Blvd	500 seat elementary school	650	124	101	225	0	0	0
64	Rolland Curtis Gardens MU	1077 W 38th St	140 apartment units and 9,000 sf retail	769	9	51	59	48	28	73
65	Honda of Downtown LA	740 W Martin Luther King Jr Blvd	39,406 sf car dealership with auto service area	1,146	51	17	68	37	56	93
66	Lucas Museum of Narrative Art	3800 Vermont Ave	325,000 sf museum	5,246	81	162	243	243	165	408
67	USC Student Housing	505 W 31st St	7 story student housing	380	7	23	30	23	13	36
68	Figueroa Centre	911 S Figueroa St	220 hotel rooms, 200 apartment units, and 94,080 sf commercial	7,141	145	164	309	316	289	605
69	Assisted Living	1030 S Lake St	338 Assisted living beds and 34 senior housing units	939	39	23	62	49	48	97
70	Mixed-use	3800 S Figueroa St	90 apartment units and 9,600 sf retail	605	5	31	36	35	19	54

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
71	Mixed-use	4050 S Figueroa St	57 affordable apartment units and 3,700 sf office	201	12	17	29	10	9	19
72	3500 Normandie Av Charter School	1372 W 35th St	350 students	111	22	19	41	13	15	28
73	Broadway Palace	928 S Broadway	667 apartment units, 17 condominium units, and 58,800 sf retail	4,715	21	229	250	272	109	381
74	2327 S Flower St	2327 S Flower St	132 dwelling units	718	12	36	48	16	42	58
Additional Related Projects identified by Planning [a]										
1 [b]	Mixed-Use	243 W Adams Blvd	296 apartments	2,167	31	105	136	105	61	166
2 [c]	USC Student Housing	505 W 31st St	73 apartment units	380	7	23	30	23	13	36
3 [d]	2595 S Hoover St	2595 S Hoover St	46 townhomes	337	5	16	21	16	10	26
4	2321 S Flower St	2321 S Flower St	280 apartments	2,050	30	99	129	99	58	157
5	2813 S Flower St	2813 S Flower St	47 hotel rooms	393	13	9	22	14	14	28
6	1069 W Exposition Blvd	1069 W Exposition Blvd	52 apartments	381	6	18	24	18	11	29
7	1265 W Exposition Blvd	1265 W Exposition Blvd	108 apartments	791	12	38	50	38	22	60
8	1421 W Adams Blvd	1421 W Adams Blvd	45 apartments	329	5	16	21	16	9	25
9	1840 W Adams Blvd	1840 W Adams Blvd	10 small lot townhomes	73	1	4	5	4	2	6

Notes:

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

[a] Additional related projects identified by LADCP in Appeal of ENV-2018-2454-CE; CF 19-1603-S1. Trip Generation Estimates based on Trip Generation, 10th Edition, Institute of Transportation Engineers, 2017.

[b] #9 in Related Project list. Project description changed from initial LADOT list in 2018.

[c] #67 in project list. Identical as before, clarified description as 73 units

[d] Built and occupied prior to 2018.

TABLE 3
FUTURE WITH PROJECT CONDITIONS (YEAR 2024)
SIGNALIZED INTERSECTION LEVELS OF SERVICE AND SIGNIFICANT IMPACTS
DRAFT 806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Intersection	Peak Hour	Future without Project Conditions		Future with Project Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue & Adams Boulevard	A.M.	1.002	F	1.003	F	0.001	NO
		P.M.	1.026	F	1.027	F	0.001	NO
2.	Hoover Street & 23rd Street	A.M.	0.729	C	0.730	C	0.001	NO
		P.M.	0.696	B	0.699	B	0.003	NO
3.	Hoover Street & Adams Boulevard	A.M.	0.899	D	0.899	D	0.000	NO
		P.M.	0.919	E	0.927	E	0.008	NO
4.	Hoover Street & 30th Street	A.M.	0.415	A	0.416	A	0.001	NO
		P.M.	0.586	A	0.595	A	0.009	NO
5.	Figueroa Street & Adams Boulevard	A.M.	1.059	F	1.060	F	0.001	NO
		P.M.	1.081	F	1.088	F	0.007	NO
6.	Grand Avenue & Adams Boulevard	A.M.	0.723	C	0.723	C	0.000	NO
		P.M.	0.885	D	0.886	D	0.001	NO

Notes:

[a] Methodology based on *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018.

[b] Results account for additional cumulative related projects shown in Tables 1 and 2 and an additional three years of ambient traffic growth to represent year 2024.

Attachment A
CMA Worksheets

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street: Vermont Avenue			Year of Count: 2018			Ambient Growth: (%): 1				Conducted by:		GTC		Date: August 2021			
1		East-West Street: Adams Boulevard			Projection Year: 2024			Peak Hour: AM				Reviewed by:				Project: 806 W Adams			
No. of Phases		4			4			4				4		4					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0			0			0				0		0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 3 SB-- 0 EB-- 0 WB-- 0			NB-- 3 SB-- 0 EB-- 0 WB-- 0			NB-- 3 SB-- 0 EB-- 0 WB-- 0				NB-- 3 SB-- 0 EB-- 0 WB-- 0		NB-- 3 SB-- 0 EB-- 0 WB-- 0					
ATSAC-1 or ATSAC+ATCS-2?		2			2			2				2		2					
Override Capacity		0			0			0				0		0					
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	77	1	77	0	77	77	33	115	1	115	0	115	1	115	0	115	1	115
	Left-Through		0							0				0				0	
	Through	987	2	494	0	987	494	92	1140	2	570	0	1140	2	570	0	1140	2	570
	Through-Right		0							0				0				0	
	Right	200	1	54	0	200	53	57	269	1	66	0	269	1	65	0	269	1	65
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
SOUTHBOUND	Left	125	1	125	0	125	125	50	183	1	183	0	183	1	183	0	183	1	183
	Left-Through		0							0				0				0	
	Through	870	1	473	0	870	473	181	1105	1	594	0	1105	1	594	0	1105	1	594
	Through-Right		1							1				1				1	
	Right	75	0	75	0	75	75	2	82	0	82	0	82	0	82	0	82	0	82
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
EASTBOUND	Left	192	1	192	0	192	192	4	208	1	208	0	208	1	208	0	208	1	208
	Left-Through		0							0				0				0	
	Through	868	1	463	0	868	463	108	1029	1	559	0	1029	1	559	0	1029	1	559
	Through-Right		1							1				1				1	
	Right	57	0	57	0	57	57	27	88	0	88	0	88	0	88	0	88	0	88
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
WESTBOUND	Left	146	1	146	1	147	147	48	203	1	203	1	204	1	204	0	204	1	204
	Left-Through		0							0				0				0	
	Through	682	1	391	0	682	391	126	850	1	499	0	850	1	500	0	850	1	500
	Through-Right		1							1				1				1	
	Right	99	0	99	1	100	100	43	148	0	148	1	149	0	149	0	149	0	149
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
CRITICAL VOLUMES		North-South: 619 East-West: 609 SUM: 1228			North-South: 619 East-West: 610 SUM: 1229			North-South: 753 East-West: 762 SUM: 1515				North-South: 753 East-West: 763 SUM: 1516				North-South: 753 East-West: 763 SUM: 1516			
VOLUME/CAPACITY (V/C) RATIO:		0.893			0.894			1.102				1.103				1.103			
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.793			0.794			1.002				1.003				1.003			
LEVEL OF SERVICE (LOS):		C			C			F				F				F			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:		Hoover Street		Year of Count:		2018		Ambient Growth: (%)		1		Conducted by:		GTC		Date:		August 2021	
		East-West Street:		23rd Street		Projection Year:		2024		Peak Hour:		AM		Reviewed by:				Project:		806 W Adams	
		No. of Phases				2				2				2						2	
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				0				0				0						0	
		Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		0	
		ATSAC-1 or ATSAC+ATCS-2?		EB-- 0 WB-- 0		0		EB-- 0 WB-- 0		0		EB-- 0 WB-- 0		0		EB-- 0 WB-- 0		0		0	
		Override Capacity				2				2				2						2	
						0				0				0						0	
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION					
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume		
NORTHBOUND	Left	42	1	42	0	42	42	0	45	1	45	0	45	1	45	0	45	1	45		
	Left-Through		0							0				0				0			
	Through	1144	2	572	3	1147	574	152	1366	2	683	3	1369	2	685	0	1369	2	685		
	Through-Right		0							0				0				0			
	Right	11	1	11	0	11	11	0	12	1	12	0	12	1	12	0	12	1	12		
	Left-Through-Right		0							0				0				0			
SOUTHBOUND	Left		0							0				0				0			
	Left-Through	102	1	102	0	102	102	0	108	1	108	0	108	1	108	0	108	1	108		
	Through	725	1	374	-1	724	374	128	898	1	461	-1	897	1	461	0	897	1	461		
	Through-Right		1							1				1				1			
	Right	23	0	23	0	23	23	0	24	0	24	0	24	0	24	0	24	0	24		
	Left-Through-Right		0							0				0				0			
EASTBOUND	Left		0							0				0				0			
	Left-Through	122	0	122	0	122	122	0	130	0	130	0	130	0	130	0	130	0	130		
	Through	79	0	225	0	79	225	0	84	0	239	0	84	0	239	0	84	0	239		
	Through-Right		0							0				0				0			
	Right	24	0	0	0	24	0	0	25	0	0	0	25	0	0	0	25	0	0		
	Left-Through-Right		1							1				1				1			
WESTBOUND	Left		0							0				0				0			
	Left-Through	36	0	36	0	36	36	0	38	0	38	0	38	0	38	0	38	0	38		
	Through	109	0	303	0	109	303	0	116	0	322	0	116	0	322	0	116	0	322		
	Through-Right		0							0				0				0			
	Right	158	0	0	0	158	0	0	168	0	0	0	168	0	0	0	168	0	0		
	Left-Through-Right		1							1				1				1			
CRITICAL VOLUMES	Left-Right		0							0				0				0			
	North-South:	674		North-South:	676		North-South:	791		North-South:	793		North-South:	793							
	East-West:	425		East-West:	425		East-West:	452		East-West:	452		East-West:	452							
VOLUME/CAPACITY (V/C) RATIO:	SUM:	1099		SUM:	1101		SUM:	1243		SUM:	1245		SUM:	1245							
	V/C LESS ATSAC/ATCS ADJUSTMENT:	0.733		V/C LESS ATSAC/ATCS ADJUSTMENT:	0.734		V/C LESS ATSAC/ATCS ADJUSTMENT:	0.829		V/C LESS ATSAC/ATCS ADJUSTMENT:	0.830		V/C LESS ATSAC/ATCS ADJUSTMENT:	0.830							
	LEVEL OF SERVICE (LOS):	0.633		LEVEL OF SERVICE (LOS):	0.634		LEVEL OF SERVICE (LOS):	0.729		LEVEL OF SERVICE (LOS):	0.730		LEVEL OF SERVICE (LOS):	0.730							
LEVEL OF SERVICE (LOS):		B			B			C			C			C							

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Hoover Street	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	GTC	Date:	August 2021										
3	East-West Street:	Adams Boulevard	Projection Year:	2024	Peak Hour:	AM	Reviewed by:		Project:	806 W Adams										
No. of Phases Opposed Ø'ing: N/S-1, E/W-2 or Both-3? Right Turns: FREE-1, NRTOR-2 or OLA-3? ATSAC-1 or ATSAC+ATCS-2? Override Capacity			NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0											
MOVEMENT			EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
			Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	110	1	110	0	110	110	12	129	1	129	0	129	1	129	0	129	1	129	
	Left-Through		0							0				0				0		
	Through	740	2	370	0	740	370	58	844	2	422	0	844	2	422	0	844	2	422	
	Through-Right		0							0				0				0		
	Right	58	1	34	-2	56	29	0	62	1	37	-2	60	1	31	0	60	1	31	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
SOUTHBOUND	Left	168	1	168	-1	167	167	27	205	1	205	-1	204	1	204	0	204	1	204	
	Left-Through		0							0				0				0		
	Through	559	2	280	0	559	280	38	631	2	316	0	631	2	316	0	631	2	316	
	Through-Right		0							0				0				0		
	Right	139	1	0	0	139	0	62	210	1	27	0	210	1	27	0	210	1	27	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
EASTBOUND	Left	287	1	287	0	287	287	61	366	1	366	0	366	1	366	0	366	1	366	
	Left-Through		0							0				0				0		
	Through	758	2	379	0	758	379	79	884	2	442	0	884	2	442	0	884	2	442	
	Through-Right		0							0				0				0		
	Right	91	1	36	0	91	36	10	107	1	43	0	107	1	43	0	107	1	43	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
WESTBOUND	Left	48	1	48	7	55	55	0	51	1	51	7	58	1	58	0	58	1	58	
	Left-Through		0							0				0				0		
	Through	603	2	302	2	605	303	120	760	2	380	2	762	2	381	0	762	2	381	
	Through-Right		0							0				0				0		
	Right	320	1	152	3	323	156	33	373	1	168	3	376	1	172	0	376	1	172	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
CRITICAL VOLUMES			North-South: 538 East-West: 589 SUM: 1127	North-South: 537 East-West: 590 SUM: 1127	North-South: 627 East-West: 746 SUM: 1373	North-South: 626 East-West: 747 SUM: 1373	North-South: 626 East-West: 747 SUM: 1373	North-South: 626 East-West: 747 SUM: 1373												
VOLUME/CAPACITY (V/C) RATIO:			0.820	0.820	0.999	0.999	0.999	0.999												
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.720	0.720	0.899	0.899	0.899	0.899												
LEVEL OF SERVICE (LOS):			C	C	D	D	D	D												

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.000	Δv/c after mitigation:	0.000
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street: Hoover Street			Year of Count: 2018			Ambient Growth: (%) 1			Conducted by:		GTC		Date: August 2021				
4		East-West Street: 30th Street			Projection Year: 2024			Peak Hour: AM			Reviewed by:				Project: 806 W Adams				
		No. of Phases			3			3			3		3		3				
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0		0		0				
		Right Turns: FREE-1, NRTOR-2 or OLA-3?			NB-- 0 SB-- 0			NB-- 0 SB-- 0			NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0				
		ATSAC-1 or ATSAC+ATCS-2?			EB-- 0 WB-- 0			EB-- 0 WB-- 0			EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0				
		Override Capacity			2			2			2		2		2				
		0			0			0			0		0		0				
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	35	1	35	0	35	35	0	37	1	37	0	37	1	37	0	37	1	37
	Left-Through		0							0				0				0	
	Through	472	2	236	-1	471	236	45	546	2	273	-1	545	2	273	0	545	2	273
	Through-Right		0							0				0				0	
	Right	43	1	30	0	43	30	3	49	1	34	0	49	1	34	0	49	1	34
	Left-Through-Right		0							0				0				0	
SOUTHBOUND	Left		0							0				0				0	
	Left-Through	68	1	68	0	68	68	10	82	1	82	0	82	1	82	0	82	1	82
	Through	493	1	322	3	496	325	31	554	1	365	3	557	1	368	0	557	1	368
	Through-Right		1							1				1				1	
	Right	150	0	150	3	153	153	16	175	0	175	3	178	0	178	0	178	0	178
	Left-Through-Right		0							0				0				0	
EASTBOUND	Left		0							0				0				0	
	Left-Through	178	1	178	-1	177	177	21	210	1	210	-1	209	1	209	0	209	1	209
	Through	71	0	105	0	71	105	0	75	0	111	0	75	0	111	0	75	0	111
	Through-Right		1							1				1				1	
	Right	34	0	0	0	34	0	0	36	0	0	0	36	0	0	0	36	0	0
	Left-Through-Right		0							0				0				0	
WESTBOUND	Left		0							0				0				0	
	Left-Through	26	1	26	0	26	26	3	31	1	31	0	31	1	31	0	31	1	31
	Through	86	1	86	0	86	86	0	91	1	91	0	91	1	91	0	91	1	91
	Through-Right		1							1				1				1	
	Right	140	0	106	0	140	106	14	163	0	122	0	163	0	122	0	163	0	122
	Left-Through-Right		0							0				0				0	
		CRITICAL VOLUMES			North-South: 357			North-South: 360			North-South: 402			North-South: 405			North-South: 405		
		East-West: 284			East-West: 283			East-West: 332			East-West: 331			East-West: 331			East-West: 331		
		SUM: 641			SUM: 643			SUM: 734			SUM: 736			SUM: 736			SUM: 736		
		VOLUME/CAPACITY (V/C) RATIO:			0.450			0.451			0.515			0.516			0.516		
		V/C LESS ATSAC/ATCS ADJUSTMENT:			0.350			0.351			0.415			0.416			0.416		
		LEVEL OF SERVICE (LOS):			A			A			A			A			A		

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Figueroa Street	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	GTC	Date:	August 2021										
5	East-West Street:	Adams Boulevard	Projection Year:	2024	Peak Hour:	AM	Reviewed by:		Project:	806 W Adams										
No. of Phases Opposed Ø'ing: N/S-1, E/W-2 or Both-3? Right Turns: FREE-1, NRTOR-2 or OLA-3? ATSAC-1 or ATSAC+ATCS-2? Override Capacity			NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0											
MOVEMENT			EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT			FUTURE CONDITION W/ PROJECT			FUTURE W/ PROJECT W/ MITIGATION					
			Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	148	1	148	0	148	148	7	164	1	164	0	164	1	164	0	164	1	164	
	Left-Through		0							0				0				0		
	Through	1187	2	594	0	1187	594	234	1494	2	747	0	1494	2	747	0	1494	2	747	
	Through-Right		0							0				0				0		
	Right	48	1	0	0	48	0	57	108	1	0	0	108	1	0	0	108	1	0	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
SOUTHBOUND	Left	188	1	188	0	188	188	29	229	1	229	0	229	1	229	0	229	1	229	
	Left-Through		0							0				0				0		
	Through	730	1	468	0	730	468	425	1200	1	712	0	1200	1	712	0	1200	1	712	
	Through-Right		1							1				1				1		
	Right	205	0	205	0	205	205	6	224	0	224	0	224	0	224	0	224	0	224	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
EASTBOUND	Left	139	1	139	2	141	141	6	154	1	154	2	156	1	156	0	156	1	156	
	Left-Through		0							0				0				0		
	Through	551	1	309	2	553	311	75	660	1	368	2	662	1	370	0	662	1	370	
	Through-Right		1							1				1				1		
	Right	66	0	66	2	68	68	5	75	0	75	2	77	0	77	0	77	0	77	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
WESTBOUND	Left	114	1	114	0	114	114	111	232	1	232	0	232	1	232	0	232	1	232	
	Left-Through		0							0				0				0		
	Through	754	2	377	0	754	377	125	925	2	463	0	925	2	463	0	925	2	463	
	Through-Right		0							0				0				0		
	Right	283	1	95	0	283	95	64	364	1	135	0	364	1	135	0	364	1	135	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
CRITICAL VOLUMES			North-South: 782 East-West: 516 SUM: 1298	North-South: 782 East-West: 518 SUM: 1300	North-South: 976 East-West: 617 SUM: 1593	North-South: 976 East-West: 619 SUM: 1595	North-South: 976 East-West: 619 SUM: 1595	North-South: 976 East-West: 619 SUM: 1595												
VOLUME/CAPACITY (V/C) RATIO:			0.944	0.945	1.159	1.160	1.160													
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.844	0.845	1.059	1.060	1.060													
LEVEL OF SERVICE (LOS):			D	D	F	F	F													

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street: Grand Avenue			Year of Count: 2018			Ambient Growth: (%): 1				Conducted by:		GTC		Date: August 2021							
6		East-West Street: Adams Boulevard			Projection Year: 2024			Peak Hour: AM				Reviewed by:				Project: 806 W Adams							
<div>No. of Phases</div> <div>Opposed Ø'ing: N/S-1, E/W-2 or Both-3?</div> <div>Right Turns: FREE-1, NRTOR-2 or OLA-3?</div> <div>ATSAC-1 or ATSAC+ATCS-2?</div> <div>Override Capacity</div>					2							2								2			
					0							0								0			
		NB-- 0 SB-- 0			0			NB-- 0 SB-- 0				NB-- 0 SB-- 0				NB-- 0 SB-- 0				NB-- 0 SB-- 0			
		EB-- 0 WB-- 0			0			EB-- 0 WB-- 0				EB-- 0 WB-- 0				EB-- 0 WB-- 0				EB-- 0 WB-- 0			
					2							2								2			
					0							0								0			
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION							
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume				
NORTHBOUND	Left	98	1	98	0	98	98	0	104	1	104	0	104	1	104	0	104	1	104				
	Left-Through		0							0				0				0					
	Through	550	1	302	0	550	302	29	613	1	335	0	613	1	335	0	613	1	335				
	Through-Right		1							1				1				1					
	Right	53	0	53	0	53	53	0	56	0	56	0	56	0	56	0	56	0	56				
	Left-Through-Right		0							0				0				0					
Left-Right		0							0				0				0						
SOUTHBOUND	Left	70	1	70	0	70	70	64	138	1	138	0	138	1	138	0	138	1	138				
	Left-Through		0							0				0				0					
	Through	300	1	177	0	300	177	518	836	1	542	0	836	1	542	0	836	1	542				
	Through-Right		1							1				1				1					
	Right	53	0	53	0	53	53	191	247	0	247	0	247	0	247	0	247	0	247				
	Left-Through-Right		0							0				0				0					
Left-Right		0							0				0				0						
EASTBOUND	Left	99	1	99	0	99	99	86	191	1	191	0	191	1	191	0	191	1	191				
	Left-Through		0							0				0				0					
	Through	554	1	317	1	555	317	301	889	1	487	1	890	1	487	0	890	1	487				
	Through-Right		1							1				1				1					
	Right	79	0	79	0	79	79	0	84	0	84	0	84	0	84	0	84	0	84				
	Left-Through-Right		0							0				0				0					
Left-Right		0							0				0				0						
WESTBOUND	Left	66	1	66	0	66	66	0	70	1	70	0	70	1	70	0	70	1	70				
	Left-Through		0							0				0				0					
	Through	581	1	339	0	581	339	47	664	1	398	0	664	1	398	0	664	1	398				
	Through-Right		1							1				1				1					
	Right	96	0	96	0	96	96	29	131	0	131	0	131	0	131	0	131	0	131				
	Left-Through-Right		0							0				0				0					
Left-Right		0							0				0				0						
CRITICAL VOLUMES		North-South: 372			North-South: 372			North-South: 646				North-South: 646				North-South: 646							
		East-West: 438			East-West: 438			East-West: 589				East-West: 589				East-West: 589							
		SUM: 810			SUM: 810			SUM: 1235				SUM: 1235				SUM: 1235							
VOLUME/CAPACITY (V/C) RATIO:					0.540							0.823								0.823			
V/C LESS ATSAC/ATCS ADJUSTMENT:					0.440							0.723								0.723			
LEVEL OF SERVICE (LOS):					A							C								C			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.000	Δv/c after mitigation:	0.000
Significant impacted?	NO	Fully mitigated?	N/A



I/S #:		North-South Street:			Vermont Avenue			Year of Count: 2018			Ambient Growth: (%):			1		Conducted by:		GTC		Date:		August 2021	
1		East-West Street:			Adams Boulevard			Projection Year: 2024			Peak Hour:			PM		Reviewed by:				Project:		806 W Adams	
		No. of Phases Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			4			4			4			4		4		4		4		4	
		Right Turns: FREE-1, NRTOR-2 or OLA-3?			NB-- 3 SB-- 0 EB-- 0 WB-- 0			NB-- 3 SB-- 0 EB-- 0 WB-- 0			NB-- 3 SB-- 0 EB-- 0 WB-- 0			NB-- 3 SB-- 0 EB-- 0 WB-- 0		NB-- 3 SB-- 0 EB-- 0 WB-- 0		NB-- 3 SB-- 0 EB-- 0 WB-- 0		NB-- 3 SB-- 0 EB-- 0 WB-- 0			
		ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2		2		2		2		2	
		Override Capacity			0			0			0			0		0		0		0		0	
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION							
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume				
NORTHBOUND	Left	85	1	85	0	85	85	39	129	1	129	0	129	1	129	0	129	1	129				
	Left-Through		0							0				0				0					
	Through	943	2	472	0	943	472	111	1112	2	556	0	1112	2	556	0	1112	2	556				
	Through-Right		0							0				0				0					
	Right	169	1	35	2	171	36	15	194	1	34	2	196	1	35	0	196	1	35				
	Left-Through-Right		0							0				0				0					
	Left-Right		0							0				0				0					
SOUTHBOUND	Left	171	1	171	2	173	173	7	189	1	189	2	191	1	191	0	191	1	191				
	Left-Through		0							0				0				0					
	Through	941	1	504	0	941	504	315	1314	1	693	0	1314	1	693	0	1314	1	693				
	Through-Right		1							1				1				1					
	Right	67	0	67	0	67	67	1	72	0	72	0	72	0	72	0	72	0	72				
	Left-Through-Right		0							0				0				0					
	Left-Right		0							0				0				0					
EASTBOUND	Left	134	1	134	0	134	134	1	143	1	143	0	143	1	143	0	143	1	143				
	Left-Through		0							0				0				0					
	Through	845	1	462	1	846	463	103	1000	1	566	1	1001	1	566	0	1001	1	566				
	Through-Right		1							1				1				1					
	Right	79	0	79	0	79	79	47	131	0	131	0	131	0	131	0	131	0	131				
	Left-Through-Right		0							0				0				0					
	Left-Right		0							0				0				0					
WESTBOUND	Left	134	1	134	1	135	135	18	160	1	160	1	161	1	161	0	161	1	161				
	Left-Through		0							0				0				0					
	Through	713	1	437	1	714	438	82	839	1	509	1	840	1	510	0	840	1	510				
	Through-Right		1							1				1				1					
	Right	160	0	160	1	161	161	9	179	0	179	1	180	0	180	0	180	0	180				
	Left-Through-Right		0							0				0				0					
	Left-Right		0							0				0				0					
CRITICAL VOLUMES		North-South: 643 East-West: 596 SUM: 1239			North-South: 645 East-West: 598 SUM: 1243			North-South: 822 East-West: 726 SUM: 1548				North-South: 822 East-West: 727 SUM: 1549				North-South: 822 East-West: 727 SUM: 1549							
VOLUME/CAPACITY (V/C) RATIO:		0.901			0.904			1.126				1.127				1.127							
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.801			0.804			1.026				1.027				1.027							
LEVEL OF SERVICE (LOS):		D			D			F				F				F							

REMARKS:

Version: 1i Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δ v/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:		Hoover Street		Year of Count:		2018		Ambient Growth: (%)		1		Conducted by:		GTC		Date:		August 2021	
		East-West Street:		Adams Boulevard		Projection Year:		2024		Peak Hour:		PM		Reviewed by:				Project:		806 W Adams	
		No. of Phases						4				4				4				4	
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?						0				0				0				0	
		Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0	
		ATSAC-1 or ATSAC+ATCS-2?		EB-- 0 WB-- 3		EB-- 0 WB-- 3		EB-- 0 WB-- 3		EB-- 0 WB-- 3		EB-- 0 WB-- 3		EB-- 0 WB-- 3		EB-- 0 WB-- 3		EB-- 0 WB-- 3		EB-- 0 WB-- 3	
		Override Capacity		2		2		2		2		2		2		2		2		2	
				0		0		0		0		0		0		0		0		0	
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION					
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume		
NORTHBOUND	Left	183	1	183	0	183	183	2	196	1	196	0	196	1	196	0	196	1	196		
	Left-Through		0							0				0				0			
	Through	916	2	458	0	916	458	31	1003	2	502	0	1003	2	502	0	1003	2	502		
	Through-Right		0							0				0				0			
	Right	49	1	9	17	66	19	0	52	1	9	17	69	1	19	0	69	1	19		
	Left-Through-Right		0							0				0				0			
	Left-Right		0							0				0				0			
SOUTHBOUND	Left	159	1	159	9	168	168	27	196	1	196	9	205	1	205	0	205	1	205		
	Left-Through		0							0				0				0			
	Through	786	2	393	0	786	393	41	875	2	438	0	875	2	438	0	875	2	438		
	Through-Right		0							0				0				0			
	Right	145	1	14	0	145	14	21	175	1	26	0	175	1	26	0	175	1	26		
	Left-Through-Right		0							0				0				0			
	Left-Right		0							0				0				0			
EASTBOUND	Left	263	1	263	0	263	263	19	298	1	298	0	298	1	298	0	298	1	298		
	Left-Through		0							0				0				0			
	Through	624	2	312	4	628	314	102	764	2	382	4	768	2	384	0	768	2	384		
	Through-Right		0							0				0				0			
	Right	227	1	136	0	227	136	2	243	1	145	0	243	1	145	0	243	1	145		
	Left-Through-Right		0							0				0				0			
	Left-Right		0							0				0				0			
WESTBOUND	Left	81	1	81	14	95	95	0	86	1	86	14	100	1	100	0	100	1	100		
	Left-Through		0							0				0				0			
	Through	692	2	346	4	696	348	74	809	2	405	4	813	2	407	0	813	2	407		
	Through-Right		0							0				0				0			
	Right	336	1	177	7	343	175	24	381	1	185	7	388	1	183	0	388	1	183		
	Left-Through-Right		0							0				0				0			
	Left-Right		0							0				0				0			
CRITICAL VOLUMES		North-South: 617		617		North-South: 626		626		North-South: 698		698		North-South: 707		707		North-South: 707		707	
		East-West: 609		609		East-West: 611		611		East-West: 703		703		East-West: 705		705		East-West: 705		705	
		SUM: 1226		1226		SUM: 1237		1237		SUM: 1401		1401		SUM: 1412		1412		SUM: 1412		1412	
VOLUME/CAPACITY (V/C) RATIO:				0.892				0.900				1.019				1.027				1.027	
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.792				0.800				0.919				0.927				0.927	
LEVEL OF SERVICE (LOS):				C				C				E				E				E	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.008	Δv/c after mitigation:	0.008
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:		Hoover Street		Year of Count:		2018		Ambient Growth: (%)		1		Conducted by:		GTC		Date:		August 2021	
		East-West Street:		30th Street		Projection Year:		2024		Peak Hour:		PM		Reviewed by:				Project:		806 W Adams	
		No. of Phases				3				3				3						3	
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				0				0				0						0	
		Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		0	
		ATSAC-1 or ATSAC+ATCS-2?		EB-- 0 WB-- 0		0		EB-- 0 WB-- 0		0		EB-- 0 WB-- 0		0		EB-- 0 WB-- 0		0		0	
		Override Capacity				2				2				2						2	
						0				0				0						0	
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION					
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume		
NORTHBOUND	Left	71	1	71	0	71	71	0	75	1	75	0	75	1	75	0	75	1	75		
	Left-Through		0							0				0				0			
	Through	656	2	328	9	665	333	18	714	2	357	9	723	2	362	0	723	2	362		
	Through-Right		0							0				0				0			
	Right	26	1	10	0	26	10	4	32	1	14	0	32	1	14	0	32	1	14		
	Left-Through-Right		0							0				0				0			
SOUTHBOUND	Left		0							0				0				0			
	Left-Through	232	1	232	0	232	232	11	257	1	257	0	257	1	257	0	257	1	257		
	Through	676	1	435	7	683	442	25	743	1	483	7	750	1	490	0	750	1	490		
	Through-Right		1							1				1				1			
	Right	194	0	194	7	201	201	17	223	0	223	7	230	0	230	0	230	0	230		
	Left-Through-Right		0							0				0				0			
EASTBOUND	Left		0							0				0				0			
	Left-Through	192	1	192	9	201	201	14	218	1	218	9	227	1	227	0	227	1	227		
	Through	99	0	139	0	99	139	0	105	0	147	0	105	0	147	0	105	0	147		
	Through-Right		1							1				1				1			
	Right	40	0	0	0	40	0	0	42	0	0	0	42	0	0	0	42	0	0		
	Left-Through-Right		0							0				0				0			
WESTBOUND	Left		0							0				0				0			
	Left-Through	32	1	32	0	32	32	3	37	1	37	0	37	1	37	0	37	1	37		
	Through	146	1	132	0	146	132	0	155	1	145	0	155	1	145	0	155	1	145		
	Through-Right		1							1				1				1			
	Right	118	0	118	0	118	118	9	134	0	134	0	134	0	134	0	134	0	134		
	Left-Through-Right		0							0				0				0			
CRITICAL VOLUMES		North-South: 560		560		North-South: 565		565		North-South: 614		614		North-South: 619		619		North-South: 619			
		East-West: 324		324		East-West: 333		333		East-West: 363		363		East-West: 372		372		East-West: 372			
		SUM: 884		884		SUM: 898		898		SUM: 977		977		SUM: 991		991		SUM: 991			
VOLUME/CAPACITY (V/C) RATIO:				0.620				0.630				0.686				0.695				0.695	
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.520				0.530				0.586				0.595				0.595	
LEVEL OF SERVICE (LOS):				A				A				A				A				A	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.009	Δv/c after mitigation:	0.009
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:		Figueroa Street		Year of Count:		2018		Ambient Growth: (%)		1		Conducted by:		GTC		Date:		August 2021	
5		East-West Street:		Adams Boulevard		Projection Year:		2024		Peak Hour:		PM		Reviewed by:				Project:		806 W Adams	
No. of Phases						4				4				4						4	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?						0				0				0						0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?				NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		0	
ATSAC-1 or ATSAC+ATCS-2?				EB-- 0 WB-- 3		3		EB-- 0 WB-- 3		3		EB-- 0 WB-- 3		3		EB-- 0 WB-- 3		3		3	
Override Capacity						2				2				2						2	
						0				0				0						0	
MOVEMENT				EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
				Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	229	1	229	4	233	233	4	247	1	247	4	251	1	251	0	251	1	251		
	Left-Through		0							0				0				0			
	Through	981	2	491	0	981	491	407	1448	2	724	0	1448	2	724	0	1448	2	724		
	Through-Right		0							0				0				0			
	Right	47	1	9	0	47	9	109	159	1	61	0	159	1	61	0	159	1	61		
	Left-Through-Right		0							0				0				0			
	Left-Right		0							0				0				0			
SOUTHBOUND	Left	159	1	159	0	159	159	77	246	1	246	0	246	1	246	0	246	1	246		
	Left-Through		0							0				0				0			
	Through	840	1	476	0	840	478	537	1429	1	777	0	1429	1	779	0	1429	1	779		
	Through-Right		1							1				1				1			
	Right	111	0	111	4	115	115	6	124	0	124	4	128	0	128	0	128	0	128		
	Left-Through-Right		0							0				0				0			
	Left-Right		0							0				0				0			
EASTBOUND	Left	106	1	106	4	110	110	7	120	1	120	4	124	1	124	0	124	1	124		
	Left-Through		0							0				0				0			
	Through	539	1	330	4	543	334	102	674	1	403	4	678	1	407	0	678	1	407		
	Through-Right		1							1				1				1			
	Right	121	0	121	4	125	125	4	132	0	132	4	136	0	136	0	136	0	136		
	Left-Through-Right		0							0				0				0			
	Left-Right		0							0				0				0			
WESTBOUND	Left	76	1	76	0	76	76	116	197	1	197	0	197	1	197	0	197	1	197		
	Left-Through		0							0				0				0			
	Through	799	2	400	4	803	402	68	916	2	458	4	920	2	460	0	920	2	460		
	Through-Right		0							0				0				0			
	Right	198	1	39	0	198	39	49	259	1	13	0	259	1	13	0	259	1	13		
	Left-Through-Right		0							0				0				0			
	Left-Right		0							0				0				0			
CRITICAL VOLUMES				North-South: 705 East-West: 506 SUM: 1211		North-South: 711 East-West: 512 SUM: 1223		North-South: 1024 East-West: 600 SUM: 1624				North-South: 1030 East-West: 604 SUM: 1634				North-South: 1030 East-West: 604 SUM: 1634					
VOLUME/CAPACITY (V/C) RATIO:						0.881				0.889				1.181				1.188			
V/C LESS ATSAC/ATCS ADJUSTMENT:						0.781				0.789				1.081				1.088			
LEVEL OF SERVICE (LOS):						C				C				F				F			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.007	Δv/c after mitigation:	0.007
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Grand Avenue	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	GTC	Date:	August 2021									
6	East-West Street:	Adams Boulevard	Projection Year:	2024	Peak Hour:	PM	Reviewed by:		Project:	806 W Adams									
No. of Phases		2	2		2		2		2										
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0	0		0		0		0										
Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 0 SB-- 0	NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0										
ATSAC-1 or ATSAC+ATCS-2?		EB-- 0 WB-- 0	EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0										
Override Capacity		2	2		2		2		2										
		0	0		0		0		0										
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	103	1	103	0	103	103	0	109	1	109	0	109	1	109	0	109	1	109
	Left-Through		0							0				0				0	
	Through	575	1	326	0	575	326	77	687	1	385	0	687	1	385	0	687	1	385
	Through-Right		1							1				1				1	
	Right	77	0	77	0	77	77	0	82	0	82	0	82	0	82	0	82	0	82
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
SOUTHBOUND	Left	116	1	116	0	116	116	49	172	1	172	0	172	1	172	0	172	1	172
	Left-Through		0							0				0				0	
	Through	477	1	279	0	477	280	646	1152	1	693	0	1152	1	694	0	1152	1	694
	Through-Right		1							1				1				1	
	Right	80	0	80	2	82	82	148	233	0	233	2	235	0	235	0	235	0	235
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
EASTBOUND	Left	116	1	116	0	116	116	232	355	1	355	0	355	1	355	0	355	1	355
	Left-Through		0							0				0				0	
	Through	603	1	335	2	605	336	302	942	1	506	2	944	1	507	0	944	1	507
	Through-Right		1							1				1				1	
	Right	66	0	66	0	66	66	0	70	0	70	0	70	0	70	0	70	0	70
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
WESTBOUND	Left	66	1	66	0	66	66	0	70	1	70	0	70	1	70	0	70	1	70
	Left-Through		0							0				0				0	
	Through	433	1	243	0	433	243	49	509	1	321	0	509	1	321	0	509	1	321
	Through-Right		1							1				1				1	
	Right	53	0	53	0	53	53	77	133	0	133	0	133	0	133	0	133	0	133
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
CRITICAL VOLUMES		North-South: 442 East-West: 401 SUM: 843	North-South: 442 East-West: 402 SUM: 844	North-South: 802 East-West: 676 SUM: 1478	North-South: 803 East-West: 676 SUM: 1479	North-South: 803 East-West: 676 SUM: 1479	North-South: 803 East-West: 676 SUM: 1479	North-South: 803 East-West: 676 SUM: 1479	North-South: 803 East-West: 676 SUM: 1479	North-South: 803 East-West: 676 SUM: 1479									
VOLUME/CAPACITY (V/C) RATIO:		0.562	0.563	0.985	0.986	0.986	0.986	0.986	0.986	0.986									
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.462	0.463	0.885	0.886	0.886	0.886	0.886	0.886	0.886									
LEVEL OF SERVICE (LOS):		A	A	D	D	D	D	D	D	D									

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Attachment B

VMT Output

TABLE 1
VMT ANALYSIS SUMMARY

<i>Project Information</i>	
<u>Land Use</u>	<u>Size</u>
Housing Apartments [a]	102 dwelling units (506 bedrooms)
<i>Project Analysis</i> [b]	
Project Area Planning Commission	South Los Angeles
Travel Behavior Zone	Compact Infill
Maximum Allowable VMT Reduction	40%
<i>VMT Analysis</i> [c]	Proposed Project
Daily Vehicle Trips	2,475
Daily VMT	14,921
Household VMT per Capita [d]	5.6
Impact Threshold	6.0
Significant Impact	NO
Work VMT per Employee [e]	N/A
Impact Threshold	11.6
Significant Impact	N/A

Notes

[a] The Project proposes to construct 102 dwelling units consisting of 506 bedrooms. For conservative purposes, 506 dwelling units was used in the VMT calculation in this analysis.

[b] Project Analysis based on the *City of Los Angeles VMT Calculator Version 1.3* (July 2020).

[c] No Project design features or mitigation measures were included.

[d] Based on home-based production trips only (see Appendix D, Report 4).

[e] Based on home-based work attraction trips only (see Appendix D, Report 4).

**TABLE 2
PROJECT TRIP GENERATION ESTIMATES**

TRIP GENERATION RATES [a]									
Land Use	ITE Land Use	Rate	Daily	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
Clinic	630	per employee	9.25	77%	23%	1.12	36%	64%	0.85
Off Campus Student Housing	225	per bedroom	3.15	41%	59%	0.12	50%	50%	0.25
Day Care Center	565	per student	4.09	53%	47%	0.78	47%	53%	0.79
TRIP GENERATION ESTIMATES									
Land Use	ITE Land Use	Size	Daily	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
<u>Existing to be Removed</u>									
Clinic	630	20 Employees	185	17	5	22	6	11	17
Transit/Walk-In Adjustment - 10% [b]			-19	-2	0	-2	-1	-1	-2
Day Care Center			123	12	11	23	11	13	24
Transit/Walk-In Adjustment - 10% [b]	565	30 Students	-12	-1	-1	-2	-1	-1	-2
			277	26	15	41	15	22	37
<u>Proposed Project</u>									
Off Campus Student Housing	225	506 Bedrooms	1,594	25	36	61	64	63	127
Transit/Walk-In Adjustment - 10% [b]			-159	-3	-4	-6	-6	-6	-13
Total Proposed Project Trips			1,435	22	32	55	58	57	114
TOTAL - NET NEW PROJECT TRIPS			1,158	(4)	17	14	43	35	77

[a] Source: *Trip Generation, 10th Edition*, Institute of Transportation Engineers, 2017.

[b] Per LADOT's *Transportation Impact Study Guidelines* (December 2016), the Project Site is located within 0.25 miles walking distance from a transit station or RapidBus stop, a conservative transit reduction is applied to account for transit usage and walking visitor arrivals from the surrounding neighborhoods and adjacent commercial developments

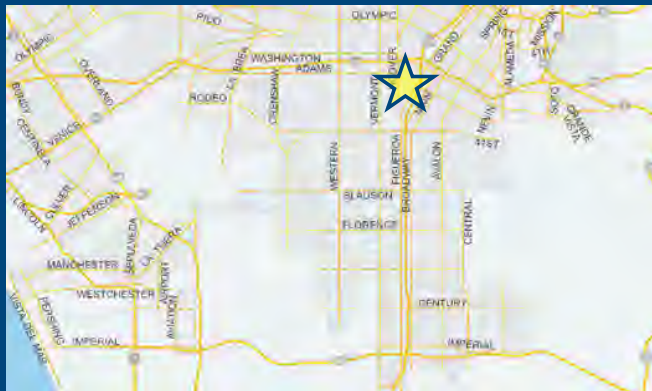
CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



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

Project Information

Project: 806 W Adams Student Housing
 Scenario: (Address located at coordinates below) [www](#)
 Address: 34.02951721384881, -118.28026403591666 [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: Housing | Single Family Value: Unit: 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: Housing | Multi-Family Value: 506 Unit: DU [+](#)
 Housing | Multi-Family 506 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	2,475 Daily Vehicle Trips
0 Daily VMT	14,921 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. ☐

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips 2,475
Net Daily Trips

The net increase in daily VMT ≤ 0 14,921
Net Daily VMT

The proposed project consists of only retail land uses ≤ 50,000 square feet total. 0.000
ksf

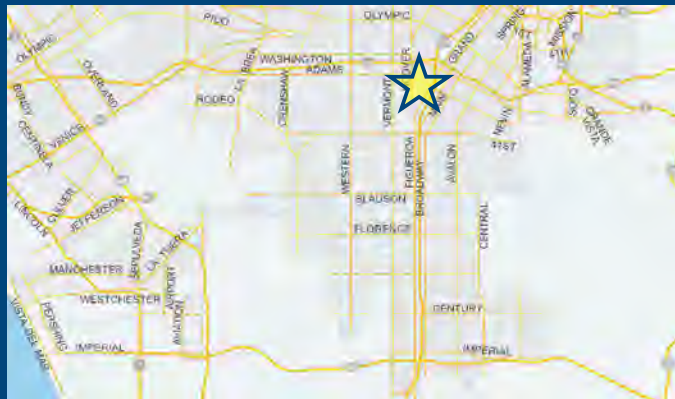
The proposed project is required to perform VMT analysis.

CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



Project Information

Project: 806 W Adams Student Housing
Scenario: (Address located at coordinates below)
Address: 34.02951721384881, -118.28026403591666



Proposed Project Land Use Type	Value	Unit
Housing Multi-Family	506	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? Proposed Project: No With Mitigation: No
Max Work Based TDM Achieved? Proposed Project: No With Mitigation: No

A
Parking

☐ Proposed Prj ☐ Mitigation

Reduce Parking Supply

city code parking provision for the project site

actual parking provision for the project site

☐ Proposed Prj ☐ Mitigation

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)

percent of employees subject to priced parking

☐ Proposed Prj ☐ Mitigation

Residential Area Parking Permits

cost (dollar) of annual permit

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

Analysis Results

Proposed Project	With Mitigation
2,475 Daily Vehicle Trips	2,475 Daily Vehicle Trips
14,921 Daily VMT	14,921 Daily VMT
5.6 Household VMT per Capita	5.6 Household VMT per Capita
N/A Work VMT per Employee	N/A Work VMT per Employee

Significant VMT Impact?	
Household: No Threshold = 6.0 15% Below APC	Household: No Threshold = 6.0 15% Below APC
Work: N/A Threshold = 11.6 15% Below APC	Work: N/A Threshold = 11.6 15% Below APC



CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359: Version 1.3



Project Information			
Land Use Type		Value	Units
Housing	Single Family	0	DU
	Multi Family	506	DU
	Townhouse	0	DU
	Hotel	0	Rooms
	Motel	0	Rooms
Affordable Housing	Family	0	DU
	Senior	0	DU
	Special Needs	0	DU
	Permanent Supportive	0	DU
Retail	General Retail	0.000	ksf
	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 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
Office	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

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359: Version 1.3



Analysis Results			
Total Employees: 0			
Total Population: 1,140			
Proposed Project		With Mitigation	
2,475	Daily Vehicle Trips	2,475	Daily Vehicle Trips
14,921	Daily VMT	14,921	Daily VMT
5.6	Household VMT per Capita	5.6	Household VMT per Capita
N/A	Work VMT per Employee	N/A	Work VMT per Employee
Significant VMT Impact?			
APC: South Los Angeles			
Impact Threshold: 15% Below APC Average			
Household = 6.0			
Work = 11.6			
Proposed Project		With Mitigation	
VMT Threshold	Impact	VMT Threshold	Impact
Household > 6.0	No	Household > 6.0	No
Work > 11.6	N/A	Work > 11.6	N/A

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359:



Version 1.3

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

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359



Version 1.3

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

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359



Version 1.3

TDM Strategy Inputs, Cont.				
Strategy Type		Description	Proposed Project	Mitigations
Commute Trip Reductions	Required commute trip reduction program	Employees participating (%)	0%	0%
	Alternative Work Schedules and Telecommute	Employees participating (%)	0%	0%
		Type of program	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)				

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359:



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)	0	0
	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

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.28026403591666



Version 1.3

TDM Adjustments by Trip Purpose & Strategy

Place type: Compact Infill

		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	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	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%	

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.28026403591666



Version 1.3

TDM Adjustments by Trip Purpose & Strategy, Cont.

Place type: Compact Infill

		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	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	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		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
MAX. TDM EFFECT		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

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

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.

CITY OF LOS ANGELES VMT CALCULATOR

Report 4: MXD Methodology

Date: August 24, 2021

Project Name: 806 W Adams Student Housing
Project Scenario: (Address located at coordinates below)
Project Address: 34.02951721384881, -118.28026403591



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	454	-17.2%	376	7.0	3,178	2,632
Home Based Other Production	1,256	-26.2%	927	4.0	5,024	3,708
Non-Home Based Other Production	586	-2.9%	569	7.3	4,278	4,154
Home-Based Work Attraction	0	0.0%	0	12.6	0	0
Home-Based Other Attraction	598	-22.1%	466	7.0	4,186	3,262
Non-Home Based Other Attraction	142	-3.5%	137	8.5	1,207	1,165

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	0.0%	376	2,632	0.0%	376	2,632
Home Based Other Production	0.0%	927	3,708	0.0%	927	3,708
Non-Home Based Other Production	0.0%	569	4,154	0.0%	569	4,154
Home-Based Work Attraction	0.0%	0	0	0.0%	0	0
Home-Based Other Attraction	0.0%	466	3,262	0.0%	466	3,262
Non-Home Based Other Attraction	0.0%	137	1,165	0.0%	137	1,165

MXD VMT Methodology Per Capita & Per Employee

Total Population: 1,140

Total Employees: 0

APC: South Los Angeles

	Proposed Project	Project with Mitigation Measures
Total Home Based Production VMT	6,340	6,340
Total Home Based Work Attraction VMT	0	0
Total Home Based VMT Per Capita	5.6	5.6
Total Work Based VMT Per Employee	N/A	N/A

Communication from Public

Name: Andrew Brady

Date Submitted: 03/31/2022 03:09 PM

Council File No: 19-1603-S1

Comments for Public Posting: Please see the attached letter from the Applicant's representative, Andrew Brady of DLA Piper. Part 1 of 4 documents attached.



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March 23, 2022
VIA EMAIL

Los Angeles City Council
c/o Office of the City Clerk
200 North Spring Street, Room 395
Los Angeles, CA 90012
Email: Clerk.CPS@lacity.org;
CityClerk@lacity.org

Re: Council File 19-1603-S1; DIR-2020-4338-RDP; 806 West Adams Boulevard (758 – 832 West Adams Boulevard; 2610 South Severance Street)

Honorable Council Members:

This letter is written on behalf of the applicant ("Applicant") for the 102-unit residential development project ("Project") located at 806 W. Adams Boulevard, Los Angeles, California ("City"). The Project is currently before the Council on a California Environmental Quality Act ("CEQA") appeal ("Appeal") challenging a "Class 32" CEQA Exemption ("Class 32 Exemption") adopted for the Project. The challenged Class 32 Exemption under CEQA was granted as part of the City's approval of a Redevelopment Plan Project Compliance Review, which was issued by the Director of Planning on January 28, 2021 ("Director's Determination") and upheld on appeal by the South Los Angeles Area Planning Commission ("SLAAPC") on June 23, 2021 ("Approval"). The Appeal was submitted by West Adams Heritage Association ("Appellant").

As is well reflected in the record for this Project, the Project's Redevelopment Plan Project Compliance Review was approved after, and apart from, its other required entitlements. Those entitlements include Site Plan Review, Density Bonus Incentives, and the adoption of a Class 32 Categorical Exemption under CEQA ("Prior Entitlements"). The Prior Entitlements were finally approved by the City in February 2020 following a virtually identical CEQA appeal to Council by the Appellant. The Prior Entitlements were also challenged in Court by the Appellant ("Prior Litigation").¹ Following a trial on the merits, on February 4, 2022, the Los Angeles Superior Court issued a judgment denying the Appellant's claims under CEQA and its claims regarding the Project's alleged inconsistency with the Zoning Code, the General Plan and the applicable Hoover Redevelopment Plan ("Redevelopment Plan"). In so ruling, the Court fully upheld the City's approval of the Project including its adoption of the Class 32 Exemption and the Project's consistency with the Redevelopment Plan.

In relation to the present Appeal, on August 12, 2021, the Planning Department issued a memorandum ("August 12 Memorandum") that reverses course on the Planning Director's prior adoption of a Class 32 Exemption for the Project, the SLAAPC's denial of the Appellant's original CEQA appeal, the City's final determination on the Prior Entitlements and the Court's ruling on in the Prior Litigation. Contrary to these prior determinations, the August 12 Memorandum asserts that the CEQA Appeal should be granted due to: (1) an alleged inconsistency between the Project and the applicable Hoover Redevelopment Plan ("Redevelopment Plan") and an alleged failure to analyze the Project's consistency with certain

¹ The Prior Litigation is captioned as *West Adams Heritage Association, et. al. v. City of Los Angeles*, Los Angeles Superior Court Case No. 20STCP00916.



March 23, 2022

Page Two

Community Plan policies; and (2) an alleged failure to analyze the Project's potential cumulative impacts meeting the definition of CEQA Guidelines Section 15300.2(b).

The first argument does not provide a valid basis to grant the Appeal. Regarding the alleged inconsistencies, the SLAAPC already made a final determination with appropriate findings that the Project is consistent with the Redevelopment Plan. The process provided for in the City's Charter and Code dictates that, if the City Council took fault with that determination, Charter Section 245 provided the means of addressing it. The City Council made no such effort here. The Charter and Code do not allow the Council to reverse the well-reasoned final determination of the SLAAPC in a CEQA appeal in a manner that effectively reverse a final agency determination on a Redevelopment Plan consistency determination. Moreover, if the Council were to determine such inconsistencies exist – either with respect to the Redevelopment Plan or Community Plan – it would not just be rendering a CEQA determination, it would be fully denying the Project's entitlements. As set forth in various other letters submitted to the City by the Applicant, such a denial would, under the present circumstances, violate state law SB 330.

Moreover, in the August 12 Memorandum itself, the basis of the assertion with respect to any alleged inconsistency with the Redevelopment Plan is the assertion that the Project is inconsistent with the base density under the Redevelopment Plan. This claim ignores the City's final and unappealable findings that the Project qualifies for additional base density under the Redevelopment Plan, findings that were defended by the City and upheld by the Court in the Prior Lawsuit. With respect to the identified Community Plan policies, the August 12 Memorandum does not assert that the Project is not consistent with the Community Plan or that the City could not make such findings for the Project, only that consistency with those specific policies should have been analyzed. However, substantial evidence in the record, including the Community Plan consistency findings made by the City for the Prior Entitlements and the Court's judgment in the Prior Litigation, demonstrates the Project's consistency with the identified Community Plan policies and, thus, the Class 32 Exemption was properly adopted for the Project.

The second claim regarding cumulative impacts is unsupported by any evidence and is contrary to exhaustive substantial evidence in the record. In the Class 32 Exemption the City adopted for the Prior Entitlements, the City determined the Project would not result in any significant cumulative impacts because it would not *contribute* to any such impacts. In the Prior Litigation, the City argued in its briefing to the Court that substantial evidence in the record supported that conclusion. The Court ruled in the City's favor on this point. In addition, an expert technical report prepared by Project CEQA consultant ICF, dated February 18, 2022, also demonstrates that the Project does not contribute to any significant cumulative impacts in conjunction with the alleged related projects identified in the August 12 Memorandum (some of these projects don't meet the applicable CEQA definition of related projects). Thus, with respect to cumulative impacts under CEQA, the August 12 Memorandum is unsupported by any evidence, is contrary to expert technical analysis and the well-founded prior decisions of the City and the Court, and does not present a valid basis for granting the Appeal.

Taking a step back, the Project should not even be subject to Redevelopment Plan Project Compliance Review approval in the first place. Under the Housing Accountability Act, a land use agency has 30 days from the date a project's application is deemed complete to inform the applicant of any alleged inconsistency between the project and "an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision." (Gov't Code § 65589.5(j)(2)(A).) Here, the City did not inform the Applicant of any alleged inconsistency between the Project and the Redevelopment Plan density



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requirement after it filed its initial application in April 2018. Rather, the City processed and approved the Prior Entitlements in February 2020. As a result, as a matter of state law, the project is deemed in compliance with the Redevelopment Plan. (Gov't Code, § 65589.5(j)(2)(B).) Thus, the City should not have determined a discretionary Redevelopment Plan Project Compliance Review approval was required in the first place, but rather a ministerial Redevelopment Plan Administrative Review, which would not require CEQA compliance and would moot the Appeal.

I. The August 12 Memorandum Provides No Basis to Grant the Appeal

a. The Project is Consistent with the Redevelopment Plan

The August 12 Memorandum asserts that a Class 32 Exemption could not be adopted for the Project because the record “did not include an adequate consistency analysis regarding the relevant Redevelopment Plan policies and LAMC Section 11.5.14 at issue.” (At, p. A-2.) Specifically, it states that “[t]his project, as currently approved, does not comply with the applicable Redevelopment Plan as its base density of 83 units is greater than the 81-unit base density permitted by the Redevelopment Plan.” (Id.) Finally, it notes that, at this stage in the proceedings, the Applicant could not remedy this inconsistency by offering an additional affordable housing unit and thus qualify for an additional density increase under the State Density Bonus law (the August 12 Memorandum asserts that, with the provision of one additional affordable unit, the Project would be consistent with the Redevelopment Plan).

In so arguing, the August 12 Memorandum ignores the substance of the Director's Determination, upheld on appeal by the SLAAPC *in a final agency determination*. **First**, the Director found that, under Government Code Section 65915, subsection (f) of the state Density Bonus law, the Project's base density was properly assessed based on the Zoning Code density applicable at the time the Project's original application was submitted in April 2018 and not the Redevelopment Plan, per state law requirements. (Director's Determination, at pp. 7-8.) The Redevelopment Plan could not override this state law mandate.

Second, the Director also found that, even if the Redevelopment Plan base density applied to the Project, the Project qualifies for additional base density under Section 1306 of the Redevelopment Plan. Under Section 1306 of the Redevelopment Plan, a project can qualify for additional base density if four findings can be made. The project at issue must: (1) Contribute to the revitalization goals of the Plan, (2) Contribute to a desirable residential environment, neighborhood stability, and not adversely impact the neighboring environment, (3) Provide units with adequate living area and avoid excessively dense development, (4) Provide appropriate parking. (Redevelopment Plan, § 1306.)

Here, the Director made these findings for the Project, determining that, even if the Redevelopment Plan's density applied to the Project, it would qualify for the required additional density under Section 1306 to match its final approved density. (Director's Determination, at pp. 9-10.) This determination is supported by substantial evidence, was upheld by the SLAAPC on appeal and is now final, unappealable and beyond the ability to challenge at the City level.

Both the Director's findings and Section 1306 of the Redevelopment Plan are ignored by the August 12 Memorandum. Because the August 12 Memorandum ignores these factors, its claim that the Project is inconsistent with Redevelopment Plan's base density is insufficient to address the ultimate issue of the



March 23, 2022

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Project's consistency with the Redevelopment Plan. The Redevelopment Plan allows additional density with certain findings the City actually made here. The August 12 Memorandum makes no effort to refute these findings, which are fully supported by substantial evidence in the record.

Moreover, in its briefing in the Prior Litigation, the City asserted that the Project is fully consistent with the Redevelopment Plan, including with respect to density. The City argued that "the City's determination and supporting evidence with respect to the Project provide substantial evidence to support each of the Redevelopment Plan findings for the bonus density [under Section 1306 of the Redevelopment Plan]."² This argument was accepted by the Court in its final judgment in the Prior Litigation, in which it ruled that "[t]he Court agrees with the City that the record nonetheless shows that the Project is consistent with the Redevelopment Plan," and that "[s]ubstantial evidence exists in the record to support a density bonus under [Section 1306 of] the Redevelopment Plan."³

Since the SLAAPC Redevelopment Plan consistency determination for the Project is final, unappealable, and went unchallenged by the Council via the Charter Section 245 process, there is no valid legal basis to reverse on CEQA grounds on this non-environmental basis. It would moreover be improper for the City to reverse course at this juncture and find the Project inconsistent with the Redevelopment Plan, contrary to the findings of the Director upheld on appeal here, the City's arguments in Court and the Court's final judgment in the Prior Litigation. But notably, the August 12 Memorandum does not attempt to provide any actual basis for ultimately finding any inconsistency, it merely points out that the base densities do not match, which is not disputed. There is no legal authority or valid factual basis whatsoever for finding the Project inconsistent with the Redevelopment Plan. To the contrary, an ample basis exists in the record for a finding of consistency, including the City's successful arguments in Court. As a result, the adoption of a Class 32 Exemption is appropriate here and the Appeal should be denied.

b. The Project is Consistent With the Community Plan

The August 12 Memorandum does not assert that the Project is inconsistent with the applicable South Los Angeles Community Plan ("Community Plan"). For this reason alone, it does not provide a basis to grant the Appeal. Rather, the August 12 Memorandum asserts that it was allegedly an error on the part of the City to fail to analyze the Project's consistency with four policies identified in the Community Plan. (August 12 Memorandum, at p. A-3.) With respect to the City's CEQA determination of consistency with the Community Plan, it is important to note that, in this case, because the Project was completely unchanged from the Prior Entitlements, the City simply adopted the Class 32 Memorandum from those entitlements. The City, in fact, determined the Project is consistent with various key Community Plan policies and objectives in both the Prior Entitlements and in the Class 32 Determination. Notably, as it did with the Redevelopment Plan, the City also argued in the Prior Litigation that the Project is consistent with the Community Plan.⁴ Again, the Court accepted this argument, ruling that the City correctly so determined.⁵ As with the Redevelopment Plan consistency determination, for the City to reverse course now and make the opposite determination would be baseless, contrary to a Court ruling, and without

² See Respondent City of Los Angeles' Opposition to Petition for Writ Mandate, November 12, 2021 ("City Brief"), at pp. 14-15, in the Prior Litigation.

³ See **Exhibit A**, Judgment Denying Petition for Writ of Mandate, February 4, 2022, Exhibit A attached thereto, adopted Tentative Ruling, at pp. 8-10.

⁴ See City Brief, at p. 16.

⁵ See Exhibit A, adopted Tentative Ruling, at pp. 10-12.



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sufficient legal and factual support. As mentioned above, it would also effectively deny the Project, contrary to SB 330.

Moreover, the Project is consistent with the four additional Community Plan policies identified in the August 12 Memorandum. Generally, the four identified Community Plan policies relate to the provision of housing for people at various income levels, including affordable housing, to meet diverse needs and support the creation of mixed-income communities in Transit-Oriented Districts. (August 12 Memorandum, at p. A-3.) The Project meets these policy objectives by providing a total of seven affordable units within a 102 unit mixed-income Project located on a largely vacant site within a Transit Priority Area that currently contains no housing units, resulting in the creation of a new mixed-income development that contributes needed housing supply to the area. The Project's affordable units also offer different income levels, including 5 Very Low Income units and 2 Workforce units, thus providing covenanted affordable housing for persons of different qualifying income levels. Indeed, in approving the Prior Entitlements and finding the Project consistent with the Community Plan, the City specifically found that the Project "creates new housing for a diverse population."⁶ There is no basis for the City to find to the contrary now and a CEQA Appeal is not the appropriate forum for such a non-environmental determination. In any event, the Project is consistent with the Community Plan. There is no basis to grant the Appeal due to any alleged inconsistency with the Community Plan.

c. The CEQA Cumulative Impacts Exception To the Class 32 Categorical Exemption Adopted for the Project Does Not Apply Here

CEQA Guidelines Section 15300.2(b) presents one of the regulatory exceptions to Categorical Exemptions. Under that provision, an agency may not adopt a Categorical Exemption for a project if "the cumulative impact of successive projects of the same type in the same place" is significant. (*Robinson v. City & County of San Francisco* (2012) 208 Cal.App.4th 950, 956-960; see also Guidelines, § 15355 [describing cumulative impacts].)

The August 12 Memorandum indicates "concerns" that the City failed to analyze the potential cumulative impacts of the Project and a list of nine allegedly related Projects, listed in Exhibit A to the memorandum (August 12 Memorandum, at p. A-3 and A-4 and Exhibit A thereto.) Quite to the contrary, as part of the Class 32 Exemption adopted for the Project with the Prior Entitlements, the City analyzed the Project's potential to contribute to any potentially significant cumulative impacts regarding other development projects within a 1.5 mile radius of the Project site. With respect to cumulative impacts, the City determined the following:

Based on a review of the types and locations of the related projects, and considering the less-than-significant impacts that would result from the Project, ***the Project would not make a cumulatively considerable contribution to any significant cumulative impacts*** when considering it along with other related present, past, and reasonably foreseeable future projects.⁷

⁶ See **Exhibit B**, CPC, Letter of Determination for the Project, Nov. 20, 2022, at p. F-4.

⁷ See **Exhibit C**, Notice of Exemption, Attachment, at pp. 12-13 (AR 30-31).



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The City defended this conclusion in the Prior Litigation, i.e., that the Project would not contribute to any significant cumulative impacts due to its own minimal impacts.⁸ Again, the Court ruled in the City's favor, finding that "the City considered the types and locations of other projects within a 1.5 mile radius of the Project and reviewed potential impacts of the Project, and concluded that 'the Project's impacts as a whole would be less than significant and not cumulatively considerable.'" (AR30-31.) For these reasons, the 'cumulative impact' exception to the Class 32 Categorical Exemption does not apply."⁹

The Project has not changed since the Prior Entitlements were adopted and, as a result, the Project's potential to contribute to cumulative impacts has also not changed. Thus, as before, substantial evidence supports the conclusion that the Project would not result in any significant cumulative impacts because the Project would not contribute to any such impacts. The exception to Categorical Exemptions under CEQA Guidelines Section 15300.2(b) does not apply here.

To the extent the August 12 Memorandum addresses alleged impacts associated with purported related projects that came about after the Class 32 Exemption analysis was prepared, a Second Supplemental Environmental Analysis for the 806 W. Adams Boulevard Residential Project was prepared by Project environmental consultant ICF, dated February 18, 2022 ("Supplemental Cumulative Report"). (**Exhibit D.**) The Supplemental Cumulative Report determined that three of the alleged related projects identified in the August 12 Memorandum did not meet a conservative definition of related projects for the purposes of the exception to Categorical Exemptions under CEQA, which apply narrowly to "successive projects of the same type in the same place." (Exhibit D, at pp. 3-5.) Nevertheless, to provide the most conservative analysis, the Supplemental Cumulative Report analyzed the potential cumulative impacts of the Project in conjunction with all nine identified alleged related projects. (*Id.*)

The Supplemental Cumulative Report analyzed the Project's potential to cause or contribute to significant cumulative impacts with respect to land use, biological resources, traffic, noise, air quality, and water quality and determined, based on substantial evidence and additional technical analysis with respect to traffic, air quality and noise, that, as the prior analyses relied on by the City for the Prior Entitlements had done, "the Project would not make a cumulatively considerable contribution to any significant cumulative impacts." (Exhibit D, at p. 11.) This substantial evidence effectively addresses the concern posed by the August 12 Memorandum and supports the City's longstanding conclusion, upheld in Court, that the Project would not cause or contribute to any significant cumulative impacts.

The August 12 Memorandum is careful not to assert that the Project would result in any significant cumulative impacts, and it provides no evidence or analysis whatsoever to indicate any such impacts would actually be caused by the Project. Based on ample substantial evidence in the record including the Class 32 Exemption adopted for Prior Entitlements that was upheld by Court in the Prior Litigation and the Supplemental Cumulative Report, which all find based on substantial evidence that the Project does not *contribute* to a cumulative impact, and in light of the total absence of substantial evidence to the contrary, the cumulative impacts exception to the Class 32 Exemption does not apply to the Project. The Appeal lacks merit and should be denied.

⁸ See City Brief, at pp. 21-22.

⁹ See Exhibit A, adopted Tentative Ruling, at pp. 18-19.



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II. The Project Should Be Subject to a Ministerial Redevelopment Plan Approval

The Project should not be subject to either a discretionary Redevelopment Plan Project Compliance Review approval or CEQA in the first place. The only reason the Redevelopment Plan Project Compliance Review approval was required in the first instance was the result of an inconsistency in the base density requirements as between the Project's approved Zoning Code density and the lower base density under the Redevelopment Plan. However, applicable terms of the Housing Accountability Act prohibit the City from finding the Project's approved Zoning Code-consistent density inconsistent with the Redevelopment Plan. Accordingly, in the alternative to simply denying the Appeal, the Appeal should be terminated, and the City should only require that the Project undergo a ministerial administrative Redevelopment Plan consistency review and find the Project consistent with the Redevelopment Plan.

a. The Project is Deemed in Compliance With the Redevelopment Plan Under the Housing Accountability Act

Under the Housing Accountability Act, "[i]f the local agency considers a proposed housing development project to be inconsistent, not in compliance, or not in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision" the agency "shall provide the Applicant with written documentation identifying the provision or provisions, and an explanation of the reason or reasons it considers the housing development to be inconsistent, not in compliance, or not in conformity." (Gov't Code § 65589.5(j)(2)(A).) For projects with 150 or fewer housing units, such notice must be provided "[w]ithin 30 days of the date that the application for the housing development project is determined to be complete." (Gov't Code § 65589.5(j)(2)(A)(i).) If the local agency fails to provide the requisite notice and documentation, "the housing development project shall be deemed consistent, compliant, and in conformity with the applicable plan, program, policy, ordinance, standard, requirement, or other similar provision." (Gov't Code, § 65589.5(j)(2)(B).)

As indicated above, the Project's original entitlement application was filed in April 2018. At that time, the Redevelopment Plan, the most recent version of which was adopted in 1989, was in place. Though it was then administered by CRA/LA, the Redevelopment Plan plainly fits into the broad description of a zoning "plan, program, policy, ordinance, standard, requirement, or other similar provision" covered by the Housing Accountability Act. The City did not provide the Project Applicant notice of any alleged inconsistency with the Redevelopment Plan within 30 days of its original Project application being deemed complete in accordance with Government Code Section 65589.5(j)(2)(A)(i). As a result, under Government Code Section 65589.5(j)(2)(B), the Project was deemed consistent with the Redevelopment Plan as a matter of state law.

As also noted above, the Project's entitlements were subject to a final vote of approval by the CPC at a hearing held on October 10, 2019. This determination approved the Project's density consistent with the Zoning Code provisions applicable to the RD1.5 zone in which the Project is located. With this final agency approval of the Project's Prior Entitlements, the City issued a condition of approval mandating that the Project seek a future, separate determination of the Project's consistency with the Redevelopment Plan.

In November 2019, the City's Redevelopment Plan Authority Transfer Ordinance went into effect, transferring administrative control over the Redevelopment Plan from CRA/LA to the City Planning



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Department and adopting new procedures for Redevelopment Plan approvals. In or around June 2020, in accordance with these new procedures, Planning determined the Project would have to apply for a discretionary Redevelopment Plan Project Compliance Review because of the aforementioned discrepancy in base density as between the approved Project, which was consistent with the Zoning Code, and the Redevelopment Plan. However, by that point, the 30-day window to inform the Applicant of this alleged inconsistency had long expired, and thus the Project was already deemed “consistent, compliant, and in conformity” with the Redevelopment Plan. (Gov’t Code, § 65589.5(j)(2)(B).)

Due to being deemed consistent with the Redevelopment Plan as a matter of state law under the Housing Accountability Act, the City erred in requiring a discretionary Redevelopment Plan Project Compliance Review approval to make findings under the Redevelopment Plan regarding the Project’s density. Rather, a simple ministerial Redevelopment Plan Administrative Review should have been required due to the Project’s legally deemed compliance with the Redevelopment Plan. Ministerial approvals do not require compliance with CEQA, and, thus, this legal mandate warrants dismissal of the pending CEQA appeal. (Cal. Pub. Res. Code, § 21080(b)(1), (2); CEQA Guidelines, §§ 15061(b)(2), 15260, 15369.) For this additional reason, the pending Appeal should be terminated.

Moreover, under Government Code Section 65589.5(j)(1), a City may only disapprove a housing project that complies “with applicable, objective general plan, zoning, and subdivision standards and criteria” “*in effect at the time that the application was deemed complete*” if it can make findings that the housing project would have “specific adverse” impacts upon public health. There is zero evidence in the record supporting the conclusion that the City can validly make any such negative health and safety findings for the Project, which is standard residential building on a multi-family zoned lot. To the contrary, the City has already made findings in the Prior Entitlements that the Project would not cause any negative public health and safety impacts.

Thus, to the extent the City wishes to contend it was not required to give notice of an inconsistency with the Redevelopment Plan in 2018 because it did not administer the Plan at that time, the Housing Accountability Act effectively provides that the City cannot then later adopt a new plan with an alleged inconsistency with the Project and apply it to the Project. Government Code Section 65589.5(j)(1) mandates that, absent health and safety findings, the City must approve the project if it is consistent with applicable objective zoning criteria *in effect when the application was deemed complete*. Under Section 65589.5(j)(1), the City had no discretion to require the applicant to seek a new discretionary approval on the basis of an alleged consistency *with a newly adopted plan*. The City cannot have it both ways, arguing the Redevelopment Plan was in effect and applicable to the Project in 2018 when the application for the Prior Entitlements was filed, but that the plan was also not subject to the Housing Accountability Act’s requirement to timely inform the Applicant of any alleged discrepancies due to the Redevelopment Plan not being administered by the City at the time.



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III. Conclusion

The Appeal and the August 12 Memorandum provide no basis for the City to depart from the consistent position it has taken on this Project for the past four years. Moreover, the present discretionary process is not valid in the first place. The Appeal is not valid and should be rejected

Sincerely,

A handwritten signature in blue ink, appearing to read 'AB', with a large loop at the end.

Andrew Brady

JN:

EXHIBIT A

American LegalNet, Inc.
www.FormsWorkFlow.com

PLAINTIFF/PETITIONER: West Adams Heritage Association et al.	CASE NUMBER: 20STCP00916
DEFENDANT/RESPONDENT: City of Los Angeles	

PROOF OF SERVICE BY FIRST-CLASS MAIL**NOTICE OF ENTRY OF JUDGMENT OR ORDER**

(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*):
1999 Harrison St., 9th Floor
Oakland, CA 94612

2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):

- a. ☐ deposited the sealed envelope with the United States Postal Service.
b. ☒ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Entry of Judgment or Order* was mailed:

- a. on (*date*): February 4, 2022
b. from (*city and state*): Oakland, CA 94612

4. The envelope was addressed and mailed as follows:

a. Name of person served: Amy Minter
Chatten-Brown, Carsetens Minter LLP

Street address: 2200 Pacific Coast Highway #318
City: Hermosa Beach
State and zip code: CA 90254

c. Name of person served:

Street address:
City:
State and zip code:

b. Name of person served: A. Catherine Norian
DLA Piper LLP

Street address: 550 South Hope Street #2400
City: Los Angeles
State and zip code: CA 90071-2678

d. Name of person served:

Street address:
City:
State and zip code:

☐ Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached -0-.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: February 4, 2022

Melissa Bender

(TYPE OR PRINT NAME OF DECLARANT)



Melissa Bender

(SIGNATURE OF DECLARANT)



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FILED
 Superior Court of California
 County of Los Angeles
02/04/2022

Sherri R. Carter, Executive Officer / Clerk of Court

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EXEMPT FROM FILING FEES
 GOV'T CODE § 6103

12 Attorneys for Respondent
 13 CITY OF LOS ANGELES

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **COUNTY OF LOS ANGELES**

16 WEST ADAMS HERITAGE ASSOCIATION
 and ADAMS SEVERANCE COALITION,

Case No. 20STCP00916

17 Petitioners,

**~~[PROPOSED]~~ JUDGMENT DENYING
 PETITION FOR WRIT OF MANDATE**

18 v.

Assigned for All Purposes to:
 Hon. Kevin C. Brazile, Dept. 20

19 CITY OF LOS ANGELES,

Action Filed: March 4, 2020
 Trial Date: December 17, 2021

20 Respondent.

21
 22 ROBERT CHAMPION; CHAMPION REAL
 ESTATE COMPANY; 806 WEST ADAMS
 23 PROPERTY, LLC and
 DOES 1 to 10,

24 Real Parties in Interest.
 25
 26
 27
 28

1 The Petition for Writ of Mandate (“Petition”) filed on March 4, 2020 by Petitioners West
2 Adams Heritage Association and Adams Severance Coalition (collectively, “Petitioners”) against
3 Respondent City of Los Angeles (“City”) and Real Parties in Interest Robert Champion,
4 Champion Real Estate Company, and 806 West Adams Property, LLC (collectively “Real
5 Parties”) came on for hearing before the Court on December 20, 2021, in Department 20 of the
6 Los Angeles County Superior Court, the Honorable Kevin C. Brazile, presiding. Amy Minter of
7 Chatten-Brown, Carstens & Minter LLP appeared on behalf of Petitioners, John Fox, Deputy
8 City Attorney, and Shaye Diveley of Meyers Nave appeared on behalf of Respondent, and A.
9 Catherine Norian and Andrew Brady of DLA Piper LLP appeared on behalf of Real Parties.

10 The Court considered the pleadings on file, the administrative record, all briefs submitted
11 by the parties, and the arguments and evidence presented during the hearing. Upon the conclusion
12 of the hearing, the Court adopted its “Tentative Ruling,” issued on December 17, 2021, as its final
13 Ruling, denying the Petition as the Court’s final ruling on the merits of Petitioners’ claims
14 (“Ruling”). A true and correct copy of the Ruling is attached to this Judgment as **Exhibit A** and is
15 incorporated herein as the Court’s final Statement of Decision.

16 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:**

- 17 1. For the reasons set forth in the Ruling, attached hereto as Exhibit A and
18 incorporated by this reference, the Petition is denied on all causes of action asserted
19 therein:
 - 20 (a) On Petitioners’ First Cause of Action, for violation of the California
21 Environmental Quality Act (“CEQA”), the Petition is DENIED.
 - 22 (b) On Petitioners’ Second Cause of Action, for violations of the Zoning and
23 Planning Law, the Petition is DENIED.
 - 24 (c) On Petitioners’ Third Cause of Action, for violations of the City Municipal
25 Code, the Petition is DENIED.
- 26 2. Judgment is entered in favor of each of the City and Real Parties, and against
27 Petitioners. The City and Real Parties are the prevailing parties and entitled to their
28 prejudgment court costs. City and Real Parties may jointly or separately file

memoranda of costs pursuant to California Rules of Court, Rule 3.1700, within
fifteen (15) days after the date of service of the notice of entry of judgment.

3. This Judgment disposes of all claims asserted in the Petition.

4. Petitioners shall take nothing by way of its action.

Øàl' æ^ Á

DATED: ~~January~~ ____, 2022



Kevin C. Brazile

KEVIN C. BRAZILE
JUDGE OF THE SUPERIOR COURT
Kevin C. Brazile / Judge

Submitted on January 4, 2022

By:

Amrit S. Kulkarni
Amrit S. Kulkarni (SBN: 202786)
Shaye Diveley (SBN: 215602)
Collin S. McCarthy (SBN: 305489)
MEYERS NAVE

Attorneys for Respondent
CITY OF LOS ANGELES

5038173.3

EXHIBIT A

TENTATIVE RULING
JUDGE KEVIN C. BRAZILE
DEPARTMENT 20

Hearing Date:	Friday, December 17, 2021
Case Name:	<u>West Adams Heritage Association, et al. v. Champion, et al.</u>
Case No.:	20STCP00916
Motion:	Petition for Writ of Mandate
Moving Party:	Petitioners West Adams Heritage Association and Adams Severance Coalition (jointly, “Petitioners”)
Responding Party:	Respondent City of Los Angeles (“City”) and Real Parties in Interest Robert Champion, Champion Real Estate Company, and West Adams Property, LLC (“Real Parties”)
Motion:	Motion to Dismiss and/or for Judgment on the Petition for Writ of Mandate
Moving Party:	City and Real Parties
Responding Party:	Petitioners
Notice:	OK

Ruling: **The Petition for Writ of Mandate is DENIED.**

The Motion to Dismiss and/or for Judgment on the Petition for Writ of Mandate is DENIED.

The City to give notice.

Oral argument will be heard on Monday, December 20, 2021 at 9:30 a.m.

If counsel do not submit on the tentative, they are strongly encouraged to appear by LACourtConnect rather than in person due to the COVID-19 pandemic.

BACKGROUND

On March 4, 2020, Petitioners filed a Petition for Writ of Mandate challenging the City’s alleged violations of the California Environmental Quality Act (“CEQA”), planning and zoning law, and the Los Angeles Municipal Code in approving a 102-unit residential development (“Project”) proposed by Real Parties.

“The proposed project is located at 758 - 832 West Adams Boulevard & 2610 South Severance Street and involves the construction and operation of an urban infill residential development on an approximately 2.8-acre site in the University Park neighborhood of the South Los Angeles Community Plan Area, less than one mile from the University of Southern California (USC) campus.” [AR1.] “The project will demolish the existing on-site building and parking lot and construct 99 five-bedroom rental flats within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the units will be restricted affordable units for Very Low Income households. An additional four-story building provides a clubhouse that would include a variety of resident-serving amenities. In total, the project will construct 183,150 square feet of new floor area. The seven proposed buildings sit on a fully enclosed and screened single-level, ground- floor parking structure providing a total of 259 vehicle parking spaces for off-street parking.” [AR2.]

The City determined that “the Project meets the definition of a ‘project’ under the California Environmental Quality Act (CEQA),” but that “technical analyses of the Project determined that it is eligible for the Categorical Exemption from CEQA environmental review pursuant to Article III, Section I, Class 32 of the CEQA Guidelines.” [AR3.]

Before the Court are the Petition for Writ of Mandate filed by Petitioners and the joint Motion to Dismiss and/or for Judgment on the Petition for Writ of Mandate filed by the City and Real Parties.

PETITION FOR WRIT OF MANDATE

1st cause of action for violation of CEQA

“To achieve its objectives of environmental protection, CEQA has a three-tiered structure. First, if a project falls into an exempt category, or ‘ “it can be seen with certainty that the activity in question will not have a significant effect on the environment, no further agency evaluation is required.” ’ Second, if there is a possibility the project will have a significant effect on the environment, the agency must undertake an initial threshold study; if that study indicates that the project will not have a significant effect, the agency may issue a negative declaration. Finally, if the project will have a significant effect on the environment, an Environmental Impact Report (EIR) is required.” (Committee to Save the Hollywoodland Specific Plan v. City of Los Angeles (2008) 161 Cal.App.4th 1168, 1185-1186, as modified (Apr. 2, 2008).)

“The CEQA Guidelines [codified at California Code of Regulations, title 14, section 15000 et seq.] provide for 33 classes of projects that generally do not have a significant effect on the environment and therefore may be exempted from CEQA review.” (Id.)

Here, as noted above, the City relies upon a Class 32 Categorical Exemption. [AR 18.] “Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section. **(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.** (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. (c) The project site has no value, as habitat for endangered, rare or threatened species. **(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.** (e) The site can be adequately served by all required utilities and public services.” (Cal. Code Regs., tit. 14, § 15332.)

“When a project comes within a categorical exemption, no environmental review is required unless the project falls within an exception to the categorical exemption. Although categorical exemptions are construed narrowly, our review of an agency’s decision that a project falls within a categorical exemption is deferential, and we determine only whether that decision is supported by substantial evidence. Under CEQA, ‘substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact’ and ‘is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment.’” (Aptos Residents Assn. v. County of Santa Cruz (2018) 20 Cal.App.5th 1039, 1046-1047.)

Class 32 Categorical Exemption

Petitioners contend that the Project does not within a Class 32 exemption because it does not meet conditions (a) [“The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.”] and (d) [“Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.”].

As will be discussed below, Petitioners’ contentions are not well-taken.

Turning first to condition (a), the City identified the Project as being within the South Los Angeles Community Plan and the North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) District,¹ and as being zoned RD1.5-1-O (Restricted

¹ It also identified the Project as being within the South Los Angeles Alcohol Sales Specific Plan area, which requires conditional use approval for the sale of alcohol. However, it said that such “is not applicable to the Project.” (AR 4, 21, 1729.)

Density Multiple Dwelling, Height District 1, Oil Drilling Supplemental Use District), and found that the Project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. (AR4-5, 21-22, 1729-1730.)

It found, *inter alia*, that the Project meets density requirements. It states: “Five of the proposed units would be restricted affordable units for Very Low Income households; as such, the Project is eligible for a density bonus of up to 20 percent and one incentive under the State Density Bonus Law and the City's Density Bonus Ordinance. (Ordinance No. 179,681.) As a multiple dwelling residential use, the Project is an allowable use in the RD1.5 zone. The RD1.5 zone requires a minimum area of 1,500 square feet per dwelling unit, establishing a base maximum density of 83 units for the project site (124,257 / 1,500). With the allowable 20 percent density bonus, a maximum of 99 dwelling units are allowed on the project site. The Project proposes 99 dwelling units and is therefore consistent with the maximum density restriction applicable to the project site under the L.A.M.C.” (AR 4, 21-22, 1729.)

The City further found that “[t]he Project satisfies the applicable goals, objectives, and policies of the South Los Angeles Community Plan including locating higher residential densities near commercial centers, transit stations, and bus routes (Policy 1-2.1), providing for the clustering of housing units to help decrease the cost of land per unit (Policy 1-5.4), and requiring that proposed development be designed to enhance and be compatible with adjacent development (Policy 1-6.4).” (AR 5, 22, 1730.)

The City also found that the Project meets the North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) District’s purpose, which is “to: (A) promote well planned housing to meet the needs of a college/university student housing, and the needs of

the community; (B) address impacts of multiple-habitable room projects which may be incompatible with surrounding development; (C) encourage well-planned neighborhoods with adequate parking and to individually review proposed large multiple-habitable room projects; (D) assure that the project provides adequate on-site parking; and, (E) address a concentration of campus-serving housing in the vicinity.” (Id.) It explained: “The Project would provide 99 five-bedroom rental flats (up to 495 bedrooms) of off-site housing located close to transit and amenities. The Project is located in an area surrounded by other residential uses and would be compatible with the surrounding environment. The Project would be required to provide 247 parking spaces pursuant to LAMC Section 12.22.A.25(d)(1)(III) - Affordable Parking Option 1, under the City’s Density Bonus Ordinance. Parking Option 1 is consistent with the requirements of the State Density Bonus Law under Government Code Section 65915(p)(1)(A) - (C), which provide that the City cannot require parking ratios that exceed the rates of Parking 1 option where requested by a developer providing at least the minimum number of affordable housing units under the Density Bonus law. Consistent with these requirements, the Project would provide 259 spaces in a single-level podium parking structure below the residential buildings.” (Id.)

As for condition (d), the City found that the Project would not result in significant effects on traffic, noise, air quality, and water quality. [AR6-10, 23-27.]

In regards to traffic, it found:

The Los Angeles Department of Transportation (LADOT) analyzes potential project-generated traffic impacts by measuring traffic at selected intersections during typical weekday morning (7:00 AM to 10:00 AM) and afternoon (3:00 PM to 6:00 PM) peak hours, and then comparing these existing conditions with projections of present and future conditions, with and without the Project. The August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson, 2018) determined that, after accounting for trip reduction credits, the Project would generate 1,126 net new trips to and from the Project Site on a typical weekday (see Attachment A). This would include 12

morning peak hour trips and 75 afternoon peak hour trips. The study conducted detailed analyses of the effect of these trips within study area that includes six intersections under Existing with Project Conditions and Future with Project Conditions. Under Existing with Project Conditions, the study determined that all intersections would continue to operate at a Level of Service (LOS D) or better during the analyzed peak hours (consistent with existing conditions). Under Future with Project Conditions, the study determined that incremental traffic increases resulting from the Project would not exceed the applicable thresholds of significance created by LADOT that are utilized by the City for CEQA traffic analyses, and thus would not result in a significant impact at any of the six intersections within the study area. Thus, the Project would not result in significant traffic and transportation impacts and no mitigation measures are required. The study also concluded, in accordance with the 2010 Los Angeles County Congestion Management Program (Metro, 2010) (CMP) guidelines, that the Project would not have a significant impact on the regional freeway, arterial, or regional transit system.

(AR7, 24.)

In regards to noise, it found in part:

The August 2018 *Environmental Noise Study for the 806 W Adams Residential Project* (ICF, 2018) determined that the Project would comply with applicable LAMC noise regulations with proposed noise control methods incorporated into the construction process and Project design and operations (see Attachment B). Project construction activities would occur within the permitted hours established in LAMC Section 41.40, and noise levels generated from construction equipment would not exceed the maximum noise level of 75 dBA at noise-sensitive receptors located off-site after implementation of noise control methods in accordance with LAMC Section 112.05. During operations, the incorporation of noise control methods by the Project would ensure that all noise-generating mechanical equipment (e.g., heating, ventilation, and air conditioning equipment) would comply with the requirements of LAMC Section 112.02, and that noise from the Project's outdoor residential amenity spaces would comply with noise limits set forth in the LAMC. Additionally, groundborne vibration generated from the operation of heavy construction equipment at the Project Site would not reach levels that would result in building damage or human annoyance at off-site structures under widely-used standards produced by Caltrans. Furthermore, as a residential development the Project would not have any major sources of vibration during daily operations. Therefore, the Project would not result in any significant noise or groundborne vibration impacts.

(AR8, 24-25.)

Substantial evidence exists in the administrative record to support the City's decision that the Project qualifies for a Class 32 Categorical Exemption, and thus, the Court defers to such decision. (Aptos Residents, *supra*, 20 Cal.App.5th at 1046.)

Petitioners' contentions do not change the result. (See Petitioners' Opening Brief, §IV.A.1.)

For starters, Petitioners contend that the City failed to analyze whether the Project – which is within the Hoover-Exposition/University Park Redevelopment Plan area – complied with the Redevelopment Plan, and instead, deferred analysis to a post-approval process. However, as the City responds, its decision to require Real Parties to obtain approval from the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) prior to the issuance of a building permit [AR 2208] was consistent with CRA/LA's procedure at the time Real Parties submitted their project application on April 30, 2018, and is not prohibited by CEQA or any other law. The City also persuasively argues that conditioning its approval on the CRA/LA's approval assured consistency with the Redevelopment Plan because if Real Parties were somehow unable to obtain the CRA/LA's approval, the City would not issue a building permit to Real Parties.

Petitioners contend that the City relied on a higher base density of 83 units (as opposed to the 67 units allowed under Redevelopment Plan §1304). While recognizing that Redevelopment Plan §1306 allows a density bonus above the base density if certain findings are met, they contend that the City failed to make the requisite findings and the findings cannot be made in any event. But as stated above, the City calculated base density under the State Density Bonus Law and the City's Density Bonus Ordinance. (AR4, 21-22, 1729; see also AR209.) Contrary to Petitioners' assertion, PR/JSM Rivara LLC v. Community Redevelopment Agency (2009) 180 Cal.App.4th 1475 does not stand for the broad proposition that “the Redevelopment Plan's lower base density

controls when a density bonus is sought.” As relevant here, one of the issues in PR/JSM Rivara was whether design guidelines adopted by the redevelopment agency violated state density bonus law. (PR/JSM Rivara, *supra*, 180 Cal.App.4th at 1484-1486.) The Court of Appeal concluded in the negative because the city municipal code specifically authorizes a redevelopment plan to adopt base densities lower than the “maximum allowable residential density” under the applicable zoning ordinance, and thus, the developers failed to show entitlement, as a matter of right, to the “maximum allowable residential density” under the applicable zoning ordinance. (Id. at 1485-1486.)

The Court agrees with the City that the record nevertheless shows that the Project is consistent with the Redevelopment Plan. The Redevelopment Plan authorizes new housing to have higher densities than otherwise permitted for the purpose of “achiev[ing] flexibility in housing design, well-planned neighborhoods offering variety in housing and environment to all socioeconomic groups, and . . . provid[ing] appropriate land use through special methods of development.” (Petitioners’ RJN, Exhibit A, p. 25.) In line with this purpose, a density bonus may be approved under the Redevelopment Plan where it would “(1) Contribute to the revitalization goals of the Plan, (2) Contribute to a desirable residential environment, neighborhood stability, and not adversely impact the neighboring environment, (3) Provide units with adequate living area and avoid excessively dense development, (4) Provide appropriate parking.” (Id.)

Substantial evidence exists in the record to support a bonus density under the Redevelopment Plan. As the City points out: “‘[t]he proposed project replaces old structures that show signs of deferred maintenance’ and would include ‘architectural, landscaping, and site design features meant to enhance the built environment along Adams Boulevard and Severance Street.’ (AR207.) The Project would provide ‘100 five-bedroom and two three- bedroom apartment units

(up to 506 bedrooms) of off-site housing located close to transit and amenities’ and in ‘an area surrounded by other residential uses and would be compatible with the surrounding environment.’ (AR22.) Seven of the units would be affordable, with the 95 remaining units available at market rates and not restricted to students. (AR207-208.) The Project would also be required to provide 247 parking spaces ‘pursuant to LAMC section 12.22.A.25(d)(1)(III),’ which is consistent with state law ‘that the City cannot require parking ratios that exceed the rates of Parking 1 option where requested by a developer providing at least the minimum number of affordable housing units under the Density Bonus law.’ (AR22).”

Petitioners also contend that only 6% of the Project are affordable units [AR 80], which would further inhibit Redevelopment Plan §1232’s requirement that “[a]t least fifteen percent (15%) of all new or rehabilitated dwelling units developed within the Expanded Project Area by public or private entities or persons other than the Agency shall be available at affordable housing costs to persons and families of low or moderate income.” But as Petitioners themselves acknowledge, “[t]his is required for *aggregate* development in the Redevelopment Plan area.” (Petitioners’ Opening Brief, 16:17, italics supplied; see also Redevelopment Plan §1232 (stating that “[t]he percentage requirements set forth in this Section shall apply in the aggregate to housing in the Expanded project Area and not to each individual case of rehabilitation, development or construction of dwelling units”).) It is therefore not a requirement that the Project provide 15% affordable housing.

Petitioners also contend that the Project is not consistent with the South Los Angeles Community Plan’s Policy LU 4.1, which requires “a high degree of architectural compatibility and landscaping for new infill development to protect the historical and architectural character and scale of existing residential neighborhoods.” It is Petitioners’ position that the Project is “not

architecturally compatible with the historic neighborhood due to its scale, massing and lack of setbacks.” (Petitioners’ Opening Brief, citing AR 2572-2574, 2470-2472, 2201, 1641, 2201, and 1641.) Petitioners further contend that the Project is not consistent with the South Los Angeles Community Plan’s Policy LU 4.3, which states that “[n]ew multi-family residential development should be designed in accordance with established design guidelines to ensure high-quality design.” (Petitioners’ RJN, Exhibit B, p. 49.) Petitioners point to the Project’s “podium parking, lack of pedestrian friendly design and massing that overwhelms neighboring buildings.”

The Court agrees with the City that its determination shows how the Project is architecturally compatible with the surrounding neighborhood. The Project “was redesigned with the intent of having it more compatible features to surrounding homes.” (AR88.) “For example, the original design was a modern style, whereas the revised design brought in a more traditional design elements that included balconies, façade articulation, eaves, and others to complement neighboring homes that have been built with the different architectural styles, including craftsman, prevalent in the area.” (Id.)

Further, to the extent Petitioners argue that the Project is located along West Adams Boulevard, a City-designated scenic highway [AR 796], the City determined that the Project is not inconsistent with the Scenic Highway Guidelines [AR209]. “These guidelines identify the following five factors related to the maintenance of identified Scenic Highways: (1) Roadway Design and Alignment; (2) Parkway Planting/ Landscaping; (3) Signs/ Outdoor Advertising Restrictions; (4) Utilities (e.g. undergrounding of new or relocated utility facilities); (5) Opportunity for Enhanced Non-Motorized Circulation.” (AR209.) The City found that “[c]onsistent with these requirements, the project will not affect the design or alignment of West Adams Boulevard, the earthwork/grading, planting/landscaping and utilities work required for the

project will not alter the Adams Boulevard parkway and trees, and as a residential project, the project will not contain any outdoor advertising.” (Id.) It further determined that “no podium parking is visible along the project’s frontage along Adams Boulevard,” “[t]he entirety of parking podium is fully screened and the setback is fully landscaped,” and “[t]he revised elevations and renderings show the portion of the project facing Adams Boulevard is fully articulated and includes two pedestrian entrances and well as one driveway entrance.” (Id.)

Petitioners next contend that the Project does not comply with the parking requirements of the North University Park-Exposition Park-West Adams NSO. Petitioners contend that the City lacks substantial evidence to support a finding that the Project – which provides 255 parking spaces for up to 900 residents – would not impact traffic. While Petitioners recognize that the State Density Bonus Law may require the City to permit the Project to have fewer on-site parking, they contend that the City still needed to analyze and mitigate the impacts of the lack of parking.

But as the City argues in response, it did analyze the Project’s potential traffic impacts. (AR24.) As set forth above, the City reviewed traffic studies. One study “determined that all intersections would continue to operate at a Level of Service (LOS D) or better during the analyzed peak hours (consistent with existing conditions),” and “Under Future with Project Conditions, . . . determined that incremental traffic increases resulting from the Project would not exceed the applicable thresholds of significance created by LADOT that are utilized by the City for CEQA traffic analyses, and thus would not result in a significant impact at any of the six intersections within the study area.” (Id.) The Court agrees with the City that its finding that “the Project would not result in significant traffic and transportation impacts and no mitigation measures are required” is supported by substantial evidence. In addition, “parking impacts, in and of themselves, are exempted from CEQA review for [urban infill projects near transit hubs].” (See Covina Residents

for Responsible Development v. City of Covina (2018) 21 Cal.App.5th 712, 728; see also Pub. Resources Code, § 21099(d)(1) [“parking impacts of a residential . . . project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”]; San Franciscans Upholding the Downtown Plan v. City & County of San Francisco (2002) 102 Cal.App.4th 656, 697 (“The social inconvenience of having to hunt for scarce parking spaces is not an environmental impact[.]”).)

Finally, Petitioners contend that the Project – particularly, its rooftop decks – will have significant noise impacts. However, substantial evidence exists in the record to support the City’s findings to the contrary. (AR24-25, 38-39.) The noise study prepared for the Project [AR1568-1607]² provides in relevant part:

Building roofs would contain additional private amenity spaces that would include landscaping and outdoor lounge and cooking areas. Noise levels within these areas would be primarily generated by the tenants using these spaces (e.g., talking, shouting, laughing, etc.) Located approximately 22 feet from the adjacent 2-story multi-family building to the west, the pool deck would be most likely to generate audible noise levels at nearby sensitive receptors. The other outdoor activity areas would be internally oriented and unlikely to produce substantial noise levels at nearby receptors. As such, the project would include operational restrictions to limit excessive noise from pool deck activities. Such restrictions would include limiting the hours of use to between 7:00 a.m. and 10:00 p.m. (to correspond with the daytime hours specified by the City’s noise ordinance), enforcing all applicable capacity limits on the number of residents using each area (for example, as required by fire or safety codes), and restricting the exterior use of amplified music. Building management staff would be required to ensure that operations remain in compliance with the daytime noise limits set forth in the LAMC. Furthermore, the Project area includes other multi-story residential developments with outdoor spaces that provide active and passive recreational activities (e.g., swimming pools, yards, etc.), and this type of use is not out of character or otherwise inconsistent with the area.

² The noise study evaluated stationary on-site operational noise sources, including “the on-site parking structure, HVAC and pool-related mechanical equipment, and activities at the outdoor swimming pool deck, sports court, and other outdoor amenity areas.” (AR1588-1589.) Given that Petitioners are focusing on the rooftop decks, the Court does the same.

(AR1589; see also AR1589-1590 (“Project operation has the potential to generate noise levels from mechanical equipment and outdoor amenity areas in excess of the LAMC noise standards. *However, with regulatory compliance and proposed noise control measures incorporated into the project design and operations, such noise increases would be minimal.*”) (italics supplied).)

Exceptions to Class 32 Categorical Exemption

Petitioners contend that even assuming, *arguendo*, that the Project falls within the Class 32 Categorical Exemption, several exceptions apply. Specifically, Petitioners rely on: (1) the “unusual circumstances” exception; (2) the “historical resources” exception; and (3) the “cumulative impact” exception.

“Unusual Circumstances” Exception

CEQA provides that “[a] categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.” (Cal. Code Regs., tit. 14, § 15300.2(c).) “[F]or the exception to apply, it is not alone enough that there is a reasonable possibility the project will have a significant environmental effect; instead, in the words of the Guideline, there must be ‘a reasonable possibility that the activity will have a significant effect on the environment *due to unusual circumstances*.’” (Berkeley Hillside Preservation v. City of Berkeley (2015) 60 Cal.4th 1086, 1097-1098, as modified (May 27, 2015), italics in original.)

“Whether a particular project presents circumstances that are unusual for projects in an exempt class is an essentially factual inquiry, ‘founded ‘on the application of the fact-finding tribunal’s experience with the mainsprings of human conduct.’ ” Accordingly, as to this question, the agency serves as ‘the finder of fact’, and a reviewing court should apply the traditional

substantial evidence standard[.] (Id. at 1114.) “[W]hen there are ‘unusual circumstances,’ it is appropriate for agencies to apply the fair argument standard in determining whether ‘there is a reasonable possibility of a significant effect on the environment due to unusual circumstances.’ As to this question, the reviewing court’s function ‘is to determine whether substantial evidence support[s] the agency’s conclusion as to whether the prescribed “fair argument” could be made.’ ” (Id. at 1115.)

Here, Petitioners identify the Project’s rooftop decks as the “unusual circumstance.” (Petitioners’ Opening Brief, 19:13-17, citing to separate findings by the Zoning Administrator³ and the Planning Commission⁴ describing the rooftop decks as “atypical” of surrounding development.) They then contend that, under the fair argument standard, there is a reasonable possibility the Project would have adverse noise impacts due to this unusual circumstance.

However, the City found that the Project “does not demonstrate any unusual circumstances” in the first instance. (AR31.) It found that “[t]he Project Site is typical of residential urban infill development sites in transit priority areas, and neither the Project Site itself nor any of its surroundings, which consist of residential, commercial, and educational uses, present any uses, features or conditions that could reasonably be considered unusual as compared to the standard type of urban infill development the Class 32 exemption covers generally and in the more specific context of the urban environment in which the Project Site is located.” (Id.) It further found that

³ See AR1728 (“The open areas being placed on the rooftop would create uses that would be atypical of surrounding development, and bring in active uses on the rooftops of each of the seven buildings that would potentially affect surrounding uses through noise and music.”) But as Real Parties note, the same determination letter by the Zoning Administrator found that “the Project is exempt from CEQA” [AR1709] and “[t]he Project . . . does not present any unusual circumstances that would result in significant environmental impacts” [AR1741].

⁴ See AR73 (“The project’s residential levels are on the second, third and fourth floors with the roof decks proposed for each building will be atypical of any development in the immediate area and in the residential zone.”) But like the Zoning Administrator’s determination letter, the Planning Commission’s determination letter found that “the Project is exempt from CEQA” [AR80].

“the residential use proposed by the Project is a typical use in the area, which is made up of mostly residential uses.” (Id.) And, as the City notes, Petitioners’ conflicting evidence is not a ground to set aside its determination. (*Berkeley Hillside*, *supra*, 60 Cal.4th at 1114 (“[R]eviewing courts, after resolving all evidentiary conflicts in the agency's favor and indulging in all legitimate and reasonable inferences to uphold the agency's finding, must affirm that finding if there is any substantial evidence, contradicted or uncontradicted, to support it.”).)

For these reasons, the “unusual circumstances” exception to the Class 32 Categorical Exemption does not apply.

“Historical Resources” Exception

CEQA provides that “[a] categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.” (Cal. Code Regs., tit. 14, § 15300.2(f).) “[O]nce the resource has been determined to be an historical resource, then the fair argument standard applies to the question whether the proposed project ‘may cause a substantial adverse change in the significance of an historical resource’ and thereby have a significant effect on the environment.” (*Berkeley Hillside*, *supra*, 60 Cal.4th at 1117.)

The City determined, based on substantial evidence, that “[t]he Project would not cause a substantial adverse change in the significance of a historical resource.” (AR32.) It explained:

The Project Site contains one two-story building, a small storage shed, a portion of a courtyard, and a surface parking lot. The Project Site is flanked to the east, south, and west by multi-family residential buildings and to the southwest by USC’s UPC Child Development Center. The Project Site is not located in a designated Historic Preservation Overlay Zone or on a site designated as historic on any federal, state, or local database. The existing two-story building was designed and constructed in 1971. The June 14, 2018 *Phase 1 Historical Resource Assessment Report*, 806 W.

*Adams Blvd*⁵ (Historic Resources Group, 2018; see Attachment E) determined that, based on visual observation, research of primary and secondary sources, and an analysis of established eligibility criteria, the existing onsite building is not eligible for historic designation at the local, state, or national level; therefore, demolition of the existing on-site uses and construction of the Project would not constitute a substantial adverse change in the significance of a historic resource as defined by CEQA. For these reasons, this exception is not applicable to the Project.

(AR32.)

And, to the extent Petitioners are complaining that the Project's design is incompatible with those of the surrounding historic buildings, "[a]esthetic . . . impacts of a residential, mixed-use residential . . . project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (Pub. Resources Code, § 21099(d)(1); see also Protect Telegraph Hill v. City and County of San Francisco (2017) 16 Cal.App.5th 261, 272 , as modified on denial of reh'g (Oct. 12, 2017), citing to § 21099(d)(1), concluding that "any impact on the city views caused by the project is not a significant environmental impact under CEQA".)

For these reasons, the "historical resources" exception to the Class 32 Categorical Exemption does not apply.

"Cumulative Impact" Exception

CEQA provides an exception for "when the cumulative impact of successive projects of the same type in the same place, over time is significant." (Cal. Code Regs., tit. 14, § 15300.2(b).)

⁵ See AR1347-1389. Historic Resources Group also conducted a Phase II report analyzing the Project for potential direct and indirect impacts as defined by CEQA to historical resources in the Project's vicinity. (AR2370-2463.) It concluded in part: "Based on a review of designated and previously identified historical resources in the area, there are seventeen historical resources (both individual resources and historic districts) located in the Project Vicinity that were identified and evaluated for potential impacts as a result of the Project. All district contributors, individually eligible properties, and historic districts will remain intact in their current locations; and no historical resources will be demolished or materially altered in an adverse manner such that they cannot convey their historical significance. Therefore, the Project will not result in significant direct or indirect impacts to any offsite historical resources." (AR2403.)

“ ‘Cumulative impacts’ refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. [¶] (a) The individual effects may be changes resulting from a single project or a number of separate projects. [¶] (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” (Cal. Code Regs., tit. 14, § 15355.) The person challenging the exemption has the “burden to produce evidence that there was a fair argument that the cumulative impact exception applied.” (*Aptos Residents, supra*, 20 Cal.App.5th at 1052.)

Here, Petitioners point to the City’s adoption of the North University Park-Exposition Park-West Adams NSO as evidence of the City’s acknowledgment of cumulative impacts. (Petitioners’ Opening Brief, 22:12-13, citing AR 606-607.) However, as the City and Real Parties argue, Petitioners make no effort to identify any other project of “the same type in the same place” that, combined with the Project, would have a “cumulative impact” under CEQA. The general statement that the North University Park-Exposition Park-West Adams NSO is intended to “address impacts of multi-habitable room projects” does not necessarily mean that this particular Project would contribute to a cumulative impact on the environment.

On the other hand, the City considered the types and locations of other projects within a 1.5 mile radius of the Project and reviewed potential impacts of the Project, and concluded that “the Project’s impacts as a whole would be less than significant and are not cumulatively considerable.” (AR30-31.)

For these reasons, the “cumulative impact” exception to the Class 32 Categorical Exemption does not apply.

Mitigation

“ ‘An agency should decide whether a project is eligible for a categorical exemption as part of its preliminary review of the project’ without reference to or reliance upon any proposed mitigation measures.” (Salmon Protection & Watershed Network v. County of Marin (2004) 125 Cal.App.4th 1098, 1106 , as modified on denial of reh'g (Jan. 18, 2005).) “Mitigation” is defined to include: “(a) Avoiding the impact altogether by not taking a certain action or parts of an action. [¶] (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation. [¶] (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment. [¶] (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action. [¶] (e) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.” (Cal. Code Regs., tit. 14, § 15370.)

Here, Petitioners contend that the City relied on mitigation measures in reviewing the Project’s eligibility for a categorical exemption.

Petitioners’ contention is not well-taken.

Preliminarily, the City correctly contends that, since it concluded that the Project would not have a significant impact on the environment, mitigation measures were not imposed.

The City also correctly contends that Petitioners mischaracterize the Project.

First, the design revisions identified by Petitioners were made by Real Parties to address the Zoning Administrator's findings for the Site Plan Review (and not to address a CEQA impact). (AR1709-1742.) Indeed, as noted above, the Zoning Administrator determined that the Project fell within the Class 32 exception. (AR1709.)

Second, requiring the Project to comply with City noise regulations (e.g., limitations on the hours of operation for the rooftop decks) do not constitute a mitigation measure, but is a general standard applicable to all projects within the City that may properly be imposed here. (Walters v. City of Redondo Beach (2016) 1 Cal.App.5th 809, 824 (approval of project conditioned on adherence to city's noise ordinance)).

2nd cause of action for violation of zoning and planning law

Determinations of general plan consistency can be overturned only if the agency "abused its discretion—that is, did not proceed legally, or if the determination is not supported by findings, or if the findings are not supported by substantial evidence." (Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Sup'rs (1998) 62 Cal.App.4th 1332, 1338, as modified (Apr. 8, 1998).) "As for this substantial evidence prong, it has been said that a determination of general plan consistency will be reversed only if, based on the evidence before the local governing body, '... a reasonable person could not have reached the same conclusion.'" (Id.)

" 'A project is consistent with the general plan " 'if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment.' " A given project need not be in perfect conformity with each and every general plan policy. To be consistent, a subdivision development must be "compatible with" the objectives, policies, general land uses

and programs specified in the general plan.’ ” (Spring Valley Lake Assn. v. City of Victorville (2016) 248 Cal.App.4th 91, 99.)

“In addressing a claim of inconsistency, ‘it is important to keep in mind the deferential nature of our review. It is not for us to substitute our judgment for that of a local agency in making a determination of consistency; rather, the agency’s determination “comes to this court with a strong presumption of regularity.” “Once a general plan is in place, it is the province of elected city officials to examine the specifics of a proposed project to determine whether it would be ‘in harmony’ with the policies stated in the plan. It is, emphatically, *not* the role of the courts to micromanage these development decisions.” Thus, as long as the City reasonably could have made a determination of consistency, the City’s decision must be upheld, regardless of whether *we* would have made that determination in the first instance.” (Id., italics in original.)

Here, Petitioners contend that the Project violates Planning and Zoning Law because it is inconsistent with the policies set forth in the South Los Angeles Community Plan and Los Angeles Mobility Plan 2035, which are components of the City of Los Angeles General Plan.

According to Petitioners, “the Project obstructs attainment of the Community Plan’s objective to preserve the area’s ‘distinctive and historical character.’” (Petitioners’ Opening Brief, 27:7-9, citing to Petitioners’ RJN, Exhibit B, p. 45.) As with the 1st cause of action, Petitioners contend that the Project is inconsistent with South Los Angeles Community Plan’s Policy LU 4.1 and LU 4.3. For the same reasons as discussed above, the Court rejects this contention. The Court also finds that “the City reasonably could have made a determination of consistency,” and thus, defers to such determination.

3rd cause of action for violation of Los Angeles Municipal Code § 11.5.14

Los Angeles Municipal Code § 11.5.14, subdivision (D)(1)(c) requires “applications for multiple entitlements for the same project” to be “submitted and processed concurrently as provided in Section 12.36.”⁶ (Petitioners’ RJN, Exhibit C, p. 60.)

Petitioners contend that the City violated this requirement by imposing a deferred condition requiring Real Parties to obtain Redevelopment Plan compliance prior to issuance of a building permit. (AR 82, 3977.) They further contend that failure to present all necessary information prior to CEQA approval constitutes prejudicial error. (Petitioners’ Opening Brief, 28:15-21, citing Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 515.)

But as discussed above in connection with the 1st cause of action, the deferred condition was consistent with CRA/LA’s procedure at the time Real Parties submitted their project application on April 30, 2018, and is not prohibited by CEQA or any other law. Further, Los Angeles Municipal Code § 11.5.14 did not become effective until November 11, 2019,⁷ which is after Real Parties filed their application. Los Angeles Municipal Code § 12.36(B) merely states that the City “may require an applicant to amend an application for a project requiring multiple approvals to ensure that all relevant approvals are reviewed concurrently.”

For all of the above reasons, the Petition for Writ of Mandate is DENIED.

⁶ Section 12.36, subdivision (B), in turn, provides: “Section 12.36, subdivision (B), in turn, provides: “If an applicant files for a project that requires multiple Legislative and/or Quasi-judicial Approvals, then the procedures set forth in this section shall govern. Applicants shall file applications at the same time for all approvals reasonably related and necessary to complete the project. The procedures and time limits set forth in this Section shall only apply to multiple applications filed concurrently, except that, prior to a public hearing, the Director may require an applicant to amend an application for a project requiring multiple approvals to ensure that all relevant approvals are reviewed concurrently.” (Petitioners’ RJN, Exhibit D, p. 68.)

⁷ See Petitioners’ RJN, Exhibit C, p. 59.

Motion to Dismiss and/or for Judgment on the Petition for Writ of Mandate

The City and Real Parties jointly seek dismissal and/or judgment on the petition for writ of mandate “on the grounds that Petitioners failed to file an opening brief by the statutory deadline for the original trial date of October 25, 2021, without having obtained, or even attempted to obtain, a continuance of the trial.” (Notice of Motion, p. 6.) Citing to CCP §1005(b), which provides that “[u]nless otherwise ordered or specifically provided by law, all moving and supporting papers shall be served and filed at least 16 court days before the hearing,” they contend that Petitioners’ deadline was September 30, 2021, but Petitioners did not file their opening brief until October 29, 2021. As a result, they contend that Petitioners failed to meet their burden of proof on their petition. (Motion, §III.A.) Additionally, they contend that Petitioners’ conduct demonstrates lack of diligent prosecution, supporting dismissal of the petition. (Id., §III.B.)

The Court DENIES this motion.

“In any action or proceeding alleging noncompliance with this division, the petitioner shall request a hearing within 90 days from the date of filing the petition or shall be subject to dismissal on the court's own motion or on the motion of any party interested in the action or proceeding.” (Pub. Resources Code, § 21167.4(a).) “Upon the filing of a request by the petitioner for a hearing and upon application by any party, *the court shall establish a briefing schedule and a hearing date.*” (Pub. Resources Code, § 21167.4(c), emphasis supplied.) As explained in Leavitt v. County of Madera (2004) 123 Cal.App.4th 1502, as modified on denial of reh'g (Nov. 30, 2004): “The Legislature used mandatory language to describe the *court's responsibility to establish a briefing schedule and hearing date*. Thus, the Legislature intentionally imposed this burden on the court. Moreover, the marginal effort of setting a hearing date for a court already required to set a briefing schedule is negligible because of the close relationship between the two. The Legislature's decision

to involve the court in coordinating the briefing schedule and hearing date is consistent with the efforts in Assembly Bill No. 314 (1993–1994 Reg. Sess.) to streamline the procedures in CEQA for setting the briefing schedule and court hearing. The statutory language and legislative history show that the Legislature considered the matter of scheduling sufficiently important to involve the courts in overseeing that process.” (Leavitt, *supra*, 123 Cal.App.4th at 1523, emphasis supplied).

Here, Petitioners made a timely request for hearing pursuant to section 21167.4. (May 28, 2020⁸ Request for Hearing.) It is undisputed that no briefing schedule was set prior to the October 14, 2021 Final Status Conference, and that Petitioners complied with the opening brief deadline set on that date. The Court agrees with Petitioners that, unlike section 21167.4(a), which mandates dismissal for failure to “request a hearing within 90 days from the date of filing the petition,” section 21167.4(c) “contains no sanction for CEQA petitioners, nor does it direct CEQA petitioners to perform any action.” “The usual implication from such a statutory structure is that the Legislature only intended for dismissal to be a sanction in the circumstances expressly stated and no others.” (Leavitt, *supra*, 123 Cal.App.4th at 1525.)

The City and Real Parties fail to address Leavitt, even after Petitioners’ opposition raised their failure to do so.

CONCLUSION

The Petition for Writ of Mandate is DENIED.

The Motion to Dismiss and/or for Judgment on the Petition for Writ of Mandate is DENIED.

The City to give notice.

⁸ This is 85 days after the filing of the Petition for Writ of Mandate.

If counsel do not submit on the tentative, they are strongly encouraged to appear by LACourtConnect rather than in person due to the COVID-19 pandemic.

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PROOF OF SERVICE

West Adams Heritage Association, Adams Severance Coalition v. City of Los Angeles,
Superior Court of Los Angeles, Case No. 20STCP00916

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 1999 Harrison Street, 9th Floor, Oakland, CA 94612.

On January 4, 2022, I served true copies of the following document(s) described as **[PROPOSED] JUDGMENT DENYING PETITION FOR WRIT OF MANDATE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY ELECTRONIC SERVICE: I electronically filed the document(s) with the Clerk of the Court by using the One Legal system. Participants in the case who are registered users will be served by the One Legal system. Participants in the case who are not registered users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 4, 2022, at Oakland, California.



Melissa Bender

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SERVICE LIST

West Adams Heritage Association, Adams Severance Coalition v. City of Los Angeles,
Superior Court of Los Angeles, Case No. 20STCP00916

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EXHIBIT B



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: NOV 20 2019

Case No. ZA-2018-2453-CU-DB-SPR-1A

Council District: 9 – Price

CEQA: ENV-2018-2454-CE

Plan Area: South Los Angeles

Project Site: 806 West Adams Boulevard (758 – 832 West Adams Boulevard and 2610 South Severance Street)

Applicant: Bob Champion, Champion Real Estate Company
Representative: Kyndra Casper, DLA Piper LLP (US)

Appellants: 806 West Adams Property, LLC
Representative: Andrew Brady/Kyndra Casper, DLA Piper LLP (US)

Jim Childs, North University Park Community Association

At its meeting of **October 10, 2019**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

Demolition of one existing ~~on-site~~ building and associated parking lot and the construction 99 five-bedroom apartment units within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the apartment units would be restricted ~~affordable~~ units for Very Low Income households. An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the Project would construct 183,150 square feet of new floor area. The seven buildings would sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 259 vehicle parking spaces for off-street parking and 109 bicycle parking spaces. A total of 19 on-site, non-protected trees will be removed as a result of the Project.


1. **Determined**, that based on the whole of the administrative record, the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Denied** the appeal filed by Jim Childs and **sustained** the Zoning Administrator's determination to approve, pursuant to Section 12.24 W.52 of the Los Angeles Municipal Code (LAMC), a Conditional Use to permit 102 dwelling units, 99 of which contain more than five habitable rooms, within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay and a 22.5 percent Density Bonus with six percent of the base number of dwelling units set aside for Very Low Income Households, requesting one On-Menu Incentive;
3. **Granted** the appeal filed by Robert Champion and thereby **overturned** the Zoning Administrator's determination dated May 17, 2019 which approved, pursuant to LAMC Section 16.05, a Site Plan Review for a development which creates or results in an increase of more than 50 dwelling units;

4. **Adopted** the attached Modified Conditions of Approval; and
5. **Adopted** the attached Findings.

The vote proceeded as follows:

Moved: Choe
Second: Khorsand
Ayes: Ambroz, Leung, Mack, Millman, Mitchell, Padilla-Campos
Absent: Perlman

Vote: 8 – 0



Cecilia Lamas, Commission Executive Assistant
Los Angeles City Planning Commission

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is final and effective upon the mailing of this determination letter and not further appealable.

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final. The applicant is advised that any work undertaken while the CEQA clearance is on appeal is at his/her/its own risk and if the appeal is granted, it may result in (1) voiding and rescission of the CEQA clearance, the Determination, and any permits issued in reliance on the Determination and (2) the use by the City of any and all remedies to return the subject property to the condition it was in prior to issuance of the Determination.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachment: Modified Conditions of Approval, Findings

c: Henry Chu, Zoning Administrator
Nicholas Ayers, City Planning Associate
Jordann Turner, City Planner
Nicholas Hendricks, Senior City Planner

CONDITIONS OF APPROVAL

(As modified by the City Planning Commission on October 10, 2019)

Pursuant to Sections 12.22-A.25, 12.24-W.52, and 16.05 of the Los Angeles Municipal Code, the following conditions are hereby imposed upon the use of the subject property:

1. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
2. The use and development of the property shall be in substantial conformance with the plot plan submitted with the application and marked Exhibit "A", except as may be revised as a result of this action.
3. The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the Zoning Administrator to impose additional corrective Conditions, if, in the Administrator's opinion, such Conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
4. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
5. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
6. Prior to the issuance of a building permit, the Applicant shall obtain approval from the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) or the Department of City Planning, as the successor to the Community Redevelopment Agency, as approved by Ordinance 186,325.
7. Walk-in closets shall not be converted into additional habitable rooms. The project shall comply with the applicable provisions of the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay Zone at all times.
8. The total area of signage pertaining to the prospective rental or sale of the property shall not exceed 12 square feet on any lot, as provided in Section 12.21-A,7 of the Los Angeles Municipal Code.
9. Fences and walls, inclusive of storm water planter boxes, shall not exceed a height of 3 feet 6 inches within the required front yard, as provided in Section 12.22-C,20 of the Los Angeles Municipal Code. Over-in-height hedges shall constitute a violation of this regulation.
10. The rooftop amenity spaces are limited to the following hours: 7:00 a.m. to 10:00 p.m., Sunday through Thursday and 7:00 a.m. to 12:00 midnight, Friday and Saturday.

DENSITY BONUS (Condition Nos. 9 - 14)

11. **Residential Density.** The project shall be limited to a maximum density of 102 residential units including Density Bonus Units.
12. **Affordable Units.** (a) A minimum of 6% of the site's base number of units shall be reserved as affordable units for Very Low Income Households, as defined by the State Density Bonus Law 65915(C)(2). (b) In addition to the affordable units required under the Density Bonus program, the project shall also provide an additional 2 units for Workforce Housing occupancy pursuant to HCIDLA Land Use Rent Income Schedule 1, which shall be provided as 3 bedroom units to be located adjacent to one another at the project's ground floor level, as identified in Exhibit A.
13. **Changes in Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with L.A.M.C. Section 12.22-A,25.
14. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make 6% of the site's base density units available to Very-Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA, except the project's two (2) Workforce Housing occupancy units shall be provided as adjacent 3 bedroom units as stated above, and therefore shall not be subject to any conflicting design, proportionality, or dispersion requirements of the Guidelines for the Affordable Housing Incentives Program or any other city policy or practice. Refer to the Density Bonus Legislation Background section of this determination.
15. **Adjustment of Parking.** In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth pursuant to L.A.M.C. Section 12.22-A,25.
16. **Density Bonus Waivers/Incentives.**
 - a. **Setback (Rear Yard).** The building shall be permitted a 20 percent decrease in the required rear yard to allow 12 feet in lieu of the minimum 15 feet required in the RD1.5-1 O Zone.

SITE PLAN REVIEW (Condition Nos. 15 - 20)

17. Approved herein is the construction, use and maintenance of seven buildings containing a maximum combined floor area of 185,985 square feet, mixed-use building with maximum height of 45 feet above grade, containing a maximum of 102 residential units.
18. **Electric Vehicle Parking.** The project shall include at least 20 percent of the total provided parking spaces capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Of the twenty percent EV Ready parking, five (5) percent of the total provided parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the required 20 percent or five percent results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.
19. **Solar Panels.** Solar panels shall be installed on the project's rooftop space to be connected to the building's electrical system. A minimum 15% of the roof area shall be reserved for the installation of a solar photovoltaic system, to be installed prior to the issuance of a certificate of occupancy, in substantial conformance with the plans stamped "Exhibit A".
20. **Landscape Plan.**
 - a. All planters containing trees shall have a minimum depth of 48 inches (48"), including those located on the rooftop and at the ground level.
 - b. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped, including an automatic irrigation system, and maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning.
21. **Trash and Recycling.**
 - a. All trash collection and storage areas shall be located on-site and shall not visible from the public right-of-way.
 - b. Trash receptacles shall be stored in a fully enclosed building or structure, constructed with a solid roof, at all times.
 - c. Trash/recycling containers shall be locked when not in use.
22. **Rooftop Equipment.** Any structures on the roof, such as air conditioning units and other equipment, shall be fully screened from view of any abutting properties and the public

right-of-way. All screening shall be setback at least five (5) feet from the edge of the building.

ADMINISTRATIVE CONDITIONS

23. Prior to the issuance of any permits relative to this matter, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Zoning Administrator for attachment to the subject case file.
24. Prior to the clearance of any conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.
25. **INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.**

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement (b).
- (v) If the City determines it necessary to protect the City's interests, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commission, committees, employees and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

Density Bonus/Affordable Housing Incentives Compliance Findings

Pursuant to Section 12.22-A,25(g) of the L.A.M.C., the Director shall approve a density bonus and requested incentive(s) unless the director finds that:

1. **Pursuant to Section 12.22-A,25(g) of the L.A.M.C., the Director shall approve a density bonus and requested incentive(s) unless the director finds that:**

- a. *The incentives are not required to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.*

The record does not contain substantial evidence that would allow the Director to make a finding that the requested incentives are not necessary to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for very low, low, and moderate income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

The list of On-Menu Incentives in Section 12.22-A,25 of the L.A.M.C. were pre-evaluated at the time the Density Bonus Ordinance was adopted to include types of relief that minimize restrictions on the size of the project. As such, the Director will always arrive at the conclusion that the Density Bonus On-Menu Incentives are required to provide for affordable housing costs since the incentives by their nature increase the scale of the project.

Setback (Rear Yard). The requested yard incentives, allowing a 20 percent reduction to the permitted rear and side yards, are expressed in the Menu of Incentives per L.A.M.C. 12.22 A.25(f) and, as such, permit exceptions to zoning requirements that result in building design or construction efficiencies that facilitate affordable housing costs. The requested incentives allow the applicant to reduce setback requirements so the affordable housing units reserved for Very Low Income Households can be constructed and the overall space dedicated to residential uses is increased. These incentives support the applicant's decision to reserve five (5) units as affordable housing units reserved for Very Low Income Households.

- b. *The Incentive will have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there are no feasible methods to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.*

There is no evidence that the proposed incentive will have a specific adverse impact upon public health and safety or the physical environment, or any real property that

is listed in the California Register of Historical Resources. A "specific adverse impact" is defined as "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22-A,25(b)). The project does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. According to ZIMAS, the project is not located on a substandard street in a Hillside area or a Very High Fire Hazard Severity Zone. Therefore, there is no substantial evidence that the proposed project, and thus the requested incentive, will have a specific adverse impact on the physical environment, on public health and safety or the physical environment, or on any Historical Resource.

BASIS FOR CONDITIONAL USE PERMITS

A particular type of development is subject to the conditional use process because it has been determined that such use of property should not be permitted by right in a particular zone. All uses requiring a conditional use permit from the Zoning Administrator are located within Section 12.24-W of the Los Angeles Municipal Code. In order for the conditional use to be authorized, certain designated findings have to be made. In these cases, there are additional findings in lieu of the standard findings for most other conditional use categories.

2. The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.

The project will contribute to the needed supply of housing in the neighborhood, while also increasing the supply of off-street parking in the area by 255 spaces. No deviations from the zoning code have been requested herein. The proposed height, floor area, and density are all permitted without any deviations from the Code and do not require any relief from zoning regulations. The project was revised to reduce the number of stories from four levels above a garage at ground level to three levels above a garage at ground level. The project modified height and square footage, and was redesigned with the intent of having it more compatible features to surrounding homes. For example, the original design was a modern style, whereas the revised design brought in a more traditional design elements that included balconies, façade articulation, eaves, and others to complement neighboring homes that have been built with the different architectural styles, including craftsman, prevalent in the area.

The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971.

The proposed development replaces old structures that show signs of deferred maintenance. Additionally, the project adds to the housing supply to address the demand for housing in the City. The development will meet the housing needs and be beneficial to the community, city and region.

3. **The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.**

The subject site is comprised of approximately 2.8 acres of lot area and zoned RD1.5-1 with a Low Medium II Residential land use designation in the South Los Angeles Community Plan. The RD1.5 zone requires a minimum area of 1,500 square feet per dwelling unit, establishing a base maximum density of 83 units for the project site (124,257 / 1,500). With the allowable 22.5 percent density bonus, a maximum of 102 dwelling units are allowed on the project site. The Project proposes 102 dwelling units and is therefore consistent with the maximum density restriction applicable to the project site under the L.A.M.C.. The Project would have a Floor Area Ratio (FAR) of 1.75:1 (185,985 square feet) after Phase I and Phase II, and is therefore consistent with the project site's maximum FAR restriction under the L.A.M.C. of 3:1 (319,362 square feet). Height District 1 allows a maximum height of 45 feet in the RD1.5 zone. The project would have a maximum height of 45 feet and is therefore consistent with the maximum height restriction.

Property in the surrounding area is classified in the RD1.5-1, [Q]R4-1-O-HPOZ, [Q]C2-1-O, and P-1-O-HPOZ Zones. Adjacent land uses include a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, a two-story commercial building on the adjacent property to the east, and two and one-story residential and educational buildings to the south owned by the University of Southern California. The proposed residential use is consistent with the mix of residential uses in the area and its zone.

Also, the project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance; pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. These RCMs will ensure the project will not have significant impacts on noise and water. The project is beneath the threshold criteria established by LADOT for preparing a traffic study. Therefore, the project will not have any significant impacts to traffic. The project will not result in significant impacts related to air quality because it falls below interim air threshold established by City Planning staff. Interim thresholds were developed by City Planning staff based on CalEEMod model runs relying on reasonable assumptions, consulting with AQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. The project site will be adequately served by all public utilities and services given that the construction of the development will be on a site which has been previously developed and is consistent with the General Plan. The project will not degrade adjacent uses.

4. **The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any specific plan.**

There are twelve elements of the General Plan. Each of these Elements establishes policies that provide for the regulatory environment in managing the City and for addressing environmental concerns and problems. The majority of the policies derived from these Elements are in the form of code requirements of the Los Angeles Municipal Code. Except for those entitlements described herein, the project does not propose to deviate from any of the requirements of the Los Angeles Municipal Code. The Land Use Element of the City's General Plan divides the city into 35 Community Plans. The South

Los Angeles Community Plan has designated the site for Low Medium II Residential land uses with the corresponding zones of RD1.5, RD2, RW2, and RZ2.5. The RD1.5-1-O zoning of the site is consistent with the existing land use designation.

The project is located within the South Los Angeles Community Plan Area, which designates the property for Low Medium II Residential land uses with the corresponding zone of RD1.5 and Height District No. 1. The site is also located within the South Los Angeles Alcohol Sales Specific Plan; the project is not affected, as it does not involve the sale of alcoholic beverages for off-site consumption.

The project conforms to the following objectives and policies of the South Los Angeles Community Plan because the proposed use is located within an existing residential neighborhood, results in increased housing supply, and will result in the enhancement of the built environment:

Objective 1-1: "To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area..."

Policy 1-5.1: "Promote greater individual choice in type, quality, price, and location of housing"

Policy 1-5.3: "Provide for development of townhouses and other similar condo type housing units to increase ownership options:

Policy 1-5.4: "Provide for the clustering of housing units to help decrease the effective cost of land per dwelling unit."

The proposed project produces a total of 102 dwelling units and the demolition of a two-story classroom building. It creates new housing for a diverse population, and a net increase of units over existing conditions.

Section 13.12-C,2 of the L.A.M.C. requires that "Any project shall, in addition to complying with the parking requirements of Section 12.21-A(a) of this Code, also provide one additional parking space for each habitable room at or above 5 habitable rooms. Section 12.21-A,4(a) of the Code requires two parking spaces for every unit with more than three habitable rooms. However, L.A.M.C. Section 13.12.C.2 would not apply to the project. The project is providing five Very Low Income affordable housing units and requesting a 22.5 percent density bonus to allow the construction of additional dwelling units at the site. California Government Code Section 65915, subsection (p)(1) provides that were a project provides affordable housing for the required term, a local land use permitting authority is prohibited from imposing parking ratios that exceed 2.5 spaces for dwelling units with four or more bedrooms. The project would construct a total of 102 five-bedroom dwelling units in two phases. A total of 255 on-site parking spaces are required. The project would provide 255 parking spaces once both phases are constructed, which would meets the applicable requirement.

ADDITIONAL FINDINGS FOR NEIGHBORHOOD STABILIZATION OVERLAY PROJECTS**5. The project provides additional on-site parking under Section 13.2-C,2 of this Code.**

The project site is located in the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (“NSO”). L.A.M.C. Section 13.12.C.2 requires projects to comply with the parking requirements of L.A.M.C. Section 12.21.A.4(a) and provide additional on-site parking based on the number of habitable rooms within a dwelling unit.

However, as stated in the previous finding, L.A.M.C. Section 13.12.C.2 would not apply to the project. The project provides five Very Low Income affordable housing units (6 percent of the base units) and is requesting a 22.5 percent density bonus to allow the construction of additional dwelling units at the Site. California Government Code Section 65915, subsection (p)(1) provides that were a project provides affordable housing for the required term, a local land use permitting authority is prohibited from imposing parking ratios that exceed 2.5 spaces for dwelling units with four or more bedrooms. The project would construct a total of 102 dwelling units in two phases. A total of 255 on-site parking spaces are required. The project would provide 255 parking spaces once both phases are constructed, which would meet the applicable requirement.

6. There is no detrimental concentration of large scale, campus serving housing within a 1,000-foot radius of the proposed project.

The development patterns and land uses within a 1,000-foot radius of the subject site were reviewed. While the property is located in close proximity to the University of Southern California) and apartment buildings in the area that advertise to a student population, no concentration of large scale campus serving housing was found within the radius.

While the property is located in close proximity to the University of Southern California and apartment buildings in the area that advertise to a student population, no concentration of large scale campus serving housing was found within the radius. There are a number of low and medium scale apartment buildings in the vicinity, including the fraternity and sorority houses located along USC’s Greek Row, however, there is only one medium scale campus housing serving University of Southern California (“USC”) within 1,000 feet of the project: Troy East. University Village and University Gateway Apartments are located outside the 1,000 foot radius. Existing campus serving housing uses are not intensive, high-density uses, but are rather low and medium density uses consistent with surrounding General Plan and zoning designations. Therefore, there is a substantial basis to conclude there is no detrimental concentration of student housing within 1,000 feet of the Project Site.

7. The project conforms to any applicable Historic Preservation Overlay Zone (HPOZ) or Specific Plan.

The project is not within a Historic Preservation Overlay Zone. The subject property is comprised of four lots at 758 – 832 West Adams Boulevard and 2610 South Severance Street. The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project.

The existing building was constructed in 1971. None of the existing structures on the project site are designated as historic cultural monuments and the project site is not located within a Historic Preservation Overlay Zone. Furthermore, a historic resource evaluation, dated June 14, 2018, was conducted by the Historic Resources Group that reviewed the existing buildings and determined that, based on visual observation, research of primary and secondary sources, and an analysis of established eligibility criteria, the existing onsite building is not eligible for historic designation at the local, state, or national level.

The project site is located within the boundaries of the South Los Angeles Alcohol Sales Specific Plan, which seeks to regulate alcohol sales within the plan area. The project is a residential development on a residentially-zoned site. The project is not affected as it does not involve the sale of alcoholic beverages. Therefore, it is not subject to the regulations of the Specific Plan. The project is not within a Historic Preservation Overlay Zone.

SITE PLAN REVIEW FINDINGS

8. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The project is located within the South Los Angeles Community Plan Area, which designates the property for Low Medium II Residential land uses with the corresponding zone of RD1.5 and Height District No. 1. The site is also located within the South Los Angeles Alcohol Sales Specific Plan; the project is not affected, as it does not involve the sale of alcoholic beverages for off-site consumption.

The project conforms to the following objectives and policies of the South Los Angeles Community Plan because the proposed use is located within an existing residential neighborhood, results in increased housing supply, and will result in the enhancement of the built environment:

Objective 1-1: "To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area..."

Policy 1-5.1: "Promote greater individual choice in type, quality, price, and location of housing"

Policy 1-5.3: "Provide for development of townhouses and other similar condo type housing units to increase ownership options:

Policy 1-5.4: "Provide for the clustering of housing units to help decrease the effective cost of land per dwelling unit."

The proposed project produces a total of 102 dwelling units and the demolition of a two-story classroom building. It creates new housing for a diverse population, and a net increase of units over existing conditions.

Section 13.12-C,2 of the L.A.M.C. requires that "Any project shall, in addition to complying with the parking requirements of Section 12.21-A(a) of this Code, also provide one additional parking space for each habitable room at or above 5 habitable rooms. Section

12.21-A,4(a) of the Code requires two parking spaces for every unit with more than three habitable rooms. However, L.A.M.C. Section 13.12.C.2 would not apply to the Project. The Project is providing five Very Low Income affordable housing units (six percent of base units) and requesting 22.5 percent density bonus to allow the construction of additional dwelling units at the Site. California Government Code Section 65915, subsection (p)(1) provides that where a project provides affordable housing for the required term, a local land use permitting authority is prohibited from imposing parking ratios that exceed 2.5 spaces for dwelling units with four or more bedrooms. The Project would construct a total of 102 dwelling units in two phases. A total of 255 on-site parking spaces are required. The Project would provide 255 parking spaces once both phases are constructed, which would meet the applicable requirement.

9. **The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

The revised plans dated July 16, 2019, show that the arrangement of buildings and structures will be compatible with existing and future development on adjacent and neighboring properties. The project does not exceed the height limitations of the RD1.5-1-O Zone, which restricts height to 45 feet, and is within the maximum allowable floor area. The project totals 2.853 acres, and spans 354 feet 8-inches, along Adams Boulevard to the north; frontage of 176 feet, five-inches along Severance Street; 118 feet along the south abutting one-story structures, and 501 feet along the east along a parking lot, and a two-story structure. Along the west perimeter, 324 feet of the site abuts five single-family structures.

The project proposes four levels in total throughout the site. The four levels are comprised of three levels of residential uses above one level of above grade parking. The project also proposes 30,535 square feet of open space. Of this total, 700 square feet will be in the form of private open space. Common open space will be comprised of 29,835 square feet. Most of the open space is located at the roof deck, and just above the podium level as amenities for residents.

The following is a summary of the project and building arrangements and structures proposed:

Height. The project site's "1" Height District restricts height to 45 feet. The project proposes a 45-foot height. The floor area ratio is limited to 3:1. The subject buildings reach a maximum floor area of 1.75:1 for a total floor area of 185,985 square feet. No deviation or relief has been requested. The project is in compliance with the Code.

Bulk/Massing. The subject building includes a total of seven buildings above one common podium that is above grade and used for parking. Buildings are comprised of articulation and windows, and distinct architectural features that allow the building to differentiate one floor from the other. Balconies are proposed throughout residential units on all levels of residential floors. The project provides breaks.

Entrances. Ground level pedestrian entrances from Adams Boulevard are identified as part of Buildings 1 and 7. They are also identified from Severance Street as part of Building

1 and part of the podium leading into one of the long term bike parking areas just in front of Building 2. On the east elevation, a ground level entrance is located adjacent to the stairs that leads to an elevator lobby.

Yard Setbacks. The applicant has requested a 20 percent decrease in the required rear yard to allow 12 feet in lieu of the minimum 15 feet required in the RD1.5-1-O Zone. Thus, 12 feet of setback is proposed along the easterly portion of the site.

Seven-foot side yards are proposed throughout the identified side yards which include the north and south side yards as well as the yards that immediately abut the two-story multi-family homes along Severance Street and along Adams Boulevard. Technically, the portion off of Adams Boulevard will include an 8-foot 9-inch dedication, which would and a 7-foot side yard setback. A 15-foot front yard is proposed along the portion of the property that fronts Severance Avenue.

Off-Street Parking, Bicycle Parking, and Driveways. The project proposes 102 units for a total of 506 bedrooms. The project will provide 255 parking spaces. The project is requesting Parking Option 1 pursuant to LAMC 12.22 A.25(d)(1) for a qualifying Density Bonus project setting aside six (6) percent of the base density for Very Low Income Households. Parking Option 1 allows the provision of off-street parking spaces at the rate of 2.5 spaces per unit. The project consists of 102 units which results in a parking requirement of 255 parking spaces. The existing building that will be demolished provided 53 parking spaces.

The applicant will be required to provide the Code required number of bicycle parking spaces. Short term and long term bicycle parking spaces are proposed abutting the driveway proposed off of the Severance Street. More long term bike spaces are proposed further south of the short term bike parking spaces and off of the east corner near University Avenue and 27th Street. With the revision of the project, the applicant added 101 long term bike parking spaces along the south portion of the property for a total of 220 short term and long term bicycle parking spaces. A 100-foot square-foot bike work maintenance area is dedicated on the northwest portion of the building. Driveways are proposed off of two areas in the plan. The first driveway is off of Adams Boulevard, where the project will utilize an existing driveway and will remain a Right-In, Right-Out Driveway. The second driveway will be off of Severance Street where there will be one lane for vehicles to enter and another lane to exit.

Loading. The building does not propose any commercial uses. No loading areas are identified in Exhibit A.

Lighting. All lighting should will be directed away from adjacent uses. Lighting will be shielded and down-casted within the site in a manner that prevents the illumination of adjacent public rights-of-way, adjacent properties, and the night sky.

Landscaping. Abundant landscaping is proposed along the perimeter of the site as well as within the development. Such landscaping includes accent trees, perimeter trees, street trees on Adams Boulevard, raised planter shrubs, other shrubs, grasses, groundcovers, and succulents, as well as other east-west paseo trees and north-south courtyard trees and pool deck and water feature trees. The applicant is subject to the regulations of the City's landscape ordinance.

Trash Collection. Trash collection and recycle bins are proposed in two locations. They are within the first level of parking and hidden from the public rights-of-way.

The project site is unique in size and the applicant has proposed a project that includes seven buildings within the allowable height of its zone and permitted floor area ratio.

The project provides abundant landscaping to allow for an assimilation into the area. However, the podium level elevates the residential uses above ground level and the project relies on stairs along the majority of the site to serve as ingress and egress onto the development.

Compatibility Analysis

The physical challenges of the surrounding multi-family structures west of the site immediately abutting the subject property, the one-story childcare center, as well as the east portion of the site, which abuts a two-story building, Institute for Multimedia Literacy, and associated parking lot used by the University of Southern California, creates challenges for the project to be compatible. With revisions to the project, the City Planning Commission determined the project would now be compatible with surrounding uses. The project removes the appearance of the above grade parking podium and the metal screens along the majority of the east elevation, as shown in the plans marked "Exhibit A" of the 2019 Zoning Administrator determination dated May 17, 2019. The revision and the removal of the metal screens and integrating the ground floor with the residential uses above allow for the subject building to transition well to the public rights-of-way through landscaping. The appearance of a walled off ground level as stated in the Zoning Administrator determination, have been removed in the revised plans, and exhibits improved interaction with the public right-of-way and enhanced landscaping.

Compatibility with Surrounding Uses

The site is immediately surrounded by multi-family uses along the west and south, and a two-story commercial building, Institute for Multimedia Literacy for to the east. The project's residential levels are on the second, third and fourth floors with the roof decks proposed for each building will be atypical of any development in the immediate area and in the residential zone. There are many multi-family developments that range from two- to four-stories tall.

Those immediately abutting the site to the west are multi-family dwellings that have utilized structures that appear like single-family homes. In the immediate area, across Severance Street near Adams Boulevard, the Hillview Apartments (2605 Severance Street), is a four-story apartment building, which includes an above-grade parking level, similar to the project. However, there are no rooftop amenities similar to the subject project. The southern façade of the Hillview Apartments extends just under 200 feet in into Severance Street.

The USC Annenberg House Apartments (711 W. 27th Street), east of the project site, includes three levels of residential units above one above-grade parking level. The USC Annenberg House Apartments stretches from Adams Boulevard to West 27th Street with setbacks observed. This length would be comparable to the length of eastern façade of Building 7, which is approximately 323 feet in length.

The subject project would extend even further for a total length of 501.5 feet with the southernmost portion of the building, Buildings 4 and 5 extending approximately 493 from the north property line. The site is unique, and the project would be one of the largest in the immediate area. With a large rooftop amenity, which is not seen in surrounding buildings, the applicant revised the project to address the potential for noise identified by the Zoning Administrator. The project provides design features, such as locating accessible rooftop gathering areas towards away from the perimeters of the buildings to ensure noise will not affect surrounding uses. The subject building will be compatible with existing surrounding uses. In addition, the City Planning Commission imposed an additional condition restricting the hours of the outdoor rooftop deck to ensure noise from the rooftop will not be disruptive to surrounding uses.

With project revisions, the City Planning Commission determined the project would be compatible with current uses in the immediate area. The project does not exceed the height limits of the zone, and the design features allow for the rooftop amenity to be compatible with multi-family structures immediately abutting the subject project on Severance Street. Also, project's design revision allow for compatible and pedestrian friendly linkages at ground level to allow the project to blend in with the surrounding area. The craftsman design and the removal of the metal screens allows the project to bring in a pedestrian friendly design that will not affect future development in the area. Thus, modified the project will not impact future development and future uses since there are now better linkages to existing development.

10. **The residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

The project includes outdoor residential amenity spaces at the podium and building roof levels. The podium-level amenity space would include landscaping, gathering areas, paseos, outdoor cooking areas, and an outdoor swimming pool. Building roofs contain additional private amenity spaces that would include landscaping and outdoor lounge and cooking areas. The revised project locates accessible rooftop amenities away from the perimeter of the building to minimize impacts on neighboring properties.

The project will provide usable open space intended for passive or active recreational use pursuant to L.A.M.C. Section 12.21-G. The applicant has also submitted a list plant species that will be used along the perimeter of the site as well as within the development. Such include accent trees, perimeter trees, street trees on Adams Boulevard, raised planter shrubs, other shrubs, grasses, groundcovers, and succulents, as well as other east-west paseo trees and north-south courtyard trees and pool deck and water feature trees. The abundant landscaping will soften the appearance of the development, thus, allowing the new design to blend in well with surrounding uses.

ADDITIONAL MANDATORY FINDINGS

11. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone B, areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than 1 foot or where the contributing drainage area is less than 1 square mile; or areas protected by levees from the base flood.

EXHIBIT C

COUNTY CLERK'S USE

CITY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
 200 NORTH SPRING STREET, ROOM 380
 LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
 (California Environmental Quality Act Section 15062)

Filing of this form is optional. If filed, the form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152 (b). Pursuant to Public Resources Code Section 21167 (d), the filing of this notice starts a 25-day statute of limitations on court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitations being extended to 180 days.

LEAD CITY AGENCY City of Los Angeles Department of City Planning	COUNCIL DISTRICT 9 - Price
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PROJECT TITLE Q	LOG REFERENCE ENV-2016-2454-CE
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PROJECT LOCATION
 Q 758 - 832 West Arlene Boulevard & 2610 South Severance Street

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
 Q Demolition of an existing building and construction of seven buildings containing 102 apartment units

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT, IF OTHER THAN LEAD CITY AGENCY:
 Q


CONTACT PERSON Q Nicholas Ayars	AREA CODE Q 213	TELEPHONE NUMBER T Q 978-1347	EXT.
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EXEMPT STATUS: (Check One)

	STATE CEQA GUIDELINES	CITY CEQA GUIDELINES
<input type="radio"/> MINISTERIAL	Sec. 15268	Art. II, Sec. 2b
<input type="radio"/> DECLARED EMERGENCY	Sec. 15269	Art. II, Sec. 2a (1)
<input type="radio"/> EMERGENCY PROJECT	Sec. 15269 (b) & (c)	Art. II, Sec. 2a (2) & (3)
<input checked="" type="radio"/> CATEGORICAL EXEMPTION	Sec. 15300 et seq.	Art. III, Sec. 1
Class <u>32</u> Category <u> </u> (City CEQA Guidelines)		
<input type="radio"/> OTHER	(See Public Resources Code Sec. 21080 (b) and set forth state and City guideline provision)	

JUSTIFICATION FOR PROJECT EXEMPTION: (i) The development meeting the conditions described in this section: (a) The project is consistent with the applicable general plan, designation, and all applicable general plan policies as well as with the applicable zoning designation and regulations; (b) The proposed development occurs within city limits on a project site of no more than 10 acres substantially surrounded by urban uses; (c) The project site has no value as habitat for endangered, rare or threatened species; (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; (e) The site can be adequately served by all required utilities and public services.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT

SIGNATURE 	TITLE City Planning Associate	DATE 9/12/14
FEE \$5,774.00	RECEIPT NO. 0101653569	REC'D BY IVORY CHAMBERS
		DATE 9/30/14

DISTRIBUTION: (1) County Clerk, (2) City Clerk, (3) Agency Record
 Rev. 11-1-83 Rev. 1-3-10b Word

IF FILED BY THE APPLICANT:

NAME (PRINTED)

SIGNATURE

DATE

**DEPARTMENT OF
CITY PLANNING**
CITY PLANNING COMMISSION
DAVID J. WARRICK
CHAIRMAN
RENEE DAKT WILSON
VICE CHAIR
DARO INECHOE
VANDERKAMER
GEMINI HAMILTON
WARRICK
WILSON
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CITY CLERK
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CALIFORNIA**



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September 12, 2019

Applicant/Owner:
Bob Champion
Champion Real Estate Company
11620 Wilshire Boulevard
Suite 1150
Los Angeles, CA 90025

Representative:
Kyndra Casper
DLA Piper LLP (US)
550 South Hope Street
Suite 2400
Los Angeles, CA 90071-2678

RE: Case No. ZA-2018-2453-DB-CU-SPR
Address: 806 West Adams Boulevard (758 –
832 West Adams Boulevard)
Planning Area: South Los Angeles
Zone : RD1.5-1-O
D. M. : 121-5A201, 123A201, 123A203
C. D. : 9
CEQA : ENV-2018-2454-CE

RE: ENV-2018-2454-CE (Categorical Exemption - Class 32)

Project Description:

The proposed project is located at 758 – 832 West Adams Boulevard & 2610 South Severance Street and involves the construction and operation of an urban infill residential development on an approximately 2.8-acre site in the University Park neighborhood of the South Los Angeles Community Plan Area, less than one mile from the University of Southern California (USC) campus. The irregularly-shaped project site is located at the southeast corner of West Adams Boulevard and Severance Street on a block that is also bordered by Figueroa Street to the east, 28th Street to the south, and University Avenue to the southeast. The Project Site is zoned RD1.5-1-O (Restricted Density Multiple Dwelling, Height District 1, Oil Drilling Supplemental Use District) in the Los Angeles Municipal Code (LAMC) and designated as Low Medium II Residential in the South Los Angeles Community Plan. The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971. Adjacent land uses include a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, a two-story commercial building on the adjacent property to the east, and two

and one-story residential and educational buildings to the south owned by the University of Southern California. Transit bus service is provided along Washington Boulevard, 23rd Street, Adams Boulevard, Jefferson Boulevard, Figueroa Street, Flower Street, Vermont Avenue, and Hoover Street within the project site vicinity. Additionally, the Project Site is located less than 0.5 miles southwest of the Los Angeles County Metropolitan Transportation Authority's (Metro) Expo Line LATTC/Orto Institute light rail station, which provides service between downtown Los Angeles and downtown Santa Monica.

The project will demolish the existing on-site building and parking lot and construct 100 five-bedroom apartment units and two three-bedroom apartment within six, three-story buildings over a single-level podium parking structure totaling four stories. Five of the units will be restricted affordable units for Very Low Income households. An additional four-story building provides a clubhouse that would include a variety of resident-serving amenities. In total, the project will construct 185,895 square feet of new floor area. The seven proposed buildings sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 255 vehicle parking spaces for off-street parking. Vehicular access to the project site will be provided via a full access driveway (accommodating both right-turn and left-turn ingress/egress movements) located on Severance Street and a restricted access driveway (accommodating only right-turn ingress/egress movements) located on Adams Boulevard. The driveways will be designed to LADOT standards under the review of City staff.

The project includes outdoor residential amenity spaces at the podium and building roof levels. The podium-level amenity space would include landscaping, gathering areas, paseos, outdoor cooking areas, and an outdoor swimming pool. Building roofs contain additional private amenity spaces that would include landscaping and outdoor lounge and cooking areas.

Construction of the project is scheduled to begin in 2019 and would occur over a 22-month period, with anticipated completion in 2021. Although the project is anticipated to be constructed in a single phase, construction could occur in multiple phases.

During the construction period, approximately 18,120 cubic yards of building demolition material, asphalt/pavement, and soil would be exported from the project site. The proposed haul route from the project site would involve trucks traveling east on Adams Boulevard, north on Figueroa Street, west on 18th Street, and north on I-110 to a proposed export site in Santa Clarita. The final haul route is subject to review and approval by the Los Angeles Department of Building and Safety.

Because the project applicant is seeking discretionary City approvals, the Project meets the definition of a "project" under the California Environmental Quality Act (CEQA). (See CEQA Guidelines § 15378.) However, technical analyses of the Project determined that it is eligible for the Categorical Exemption from CEQA environmental review pursuant to Article III, Section I, Class 32 of the CEQA Guidelines. The Class 32 Exemption is intended to promote infill development within urbanized areas. It applies to urban infill projects that meet the following criteria:

- a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- c) The project site has no value as habitat for endangered, rare or threatened species.

- d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- e) The site can be adequately served by all required utilities and public services. (CEQA Guidelines § 15332.)

Generally, in determining that a project is exempt from CEQA, the City need not follow any particular procedural formalities. (*Great Oaks Water Co. v. Santa Clara Valley Water Dist.* (2009) 170 Cal.App.4th 956, 966-967). However, the City must include in the administrative record "substantial evidence of every element of the contended exemption..." (*Western Mut. Water Dist. v. Superior Court* (1986) 187 Cal.App.3d 1104, 1113.) Once the City has determined that a project is exempt, CEQA no longer applies and no environmental review is required. (CEQA Guidelines Sec. 15002(k)(1); *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 74.) Thus, regarding the Class 32 Exemption, for a project to qualify for a Class 32 exemption, it must demonstrate with substantial evidence that it would meet each of the criteria, including the criteria under subsection (d) of CEQA Guidelines Section 15332, which require a project not to have a significant effect on the environment with respect to traffic, noise, air quality, or water quality. A "significant effect on the environment" is defined as "a substantial, or potentially substantial, adverse change in the environment" (CEQA Guidelines, Public Resources Code Section 21608).

The Project qualifies for the Class 32 Categorical Exemption as follows:

CLASS 32 CATEGORICAL EXEMPTION

The Project qualifies for a Class 32 Categorical Exemption because it conforms to the definition of an "In-fill Project" due to meeting the five conditions listed below.

- (a) **The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.**

The 124,257-square-foot (approximately 2.8 acres) Project Site is located within the South Los Angeles Community Plan, which is one of 35 Community Plans that make up the Land Use Element of the General Plan. The South Los Angeles Community Plan land use designation for the Project Site is Low Medium II Multiple Family Residential with RD1.5, RD2, RW2, and RZ2.5 listed as corresponding zones. The Project Site is zoned RD1.5-1-Q (Restricted Density Multiple Dwelling, Height District 1, Oil Drilling Supplemental Use District). The Project Site is within the South Los Angeles Alcohol Sales Specific Plan area established by Ordinance No. 171,681 (amended by Ordinance No. 173,455) as requiring conditional use approval for the sale of alcohol, which is not applicable to the Project. The Project Site is also within the North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) District established by Ordinance No. 180,2018. The Project Site is not within the boundaries of any other specific plan, overlay, or interim control ordinance.

The Project proposes the demolition of an existing two-story plaster classroom and office building and the construction of a multi-family residential development that would include 100 five-bedroom and two three-bedroom apartment units (up to 506 bedrooms) within six residential buildings and one clubhouse building totaling 185,965 square feet of new development. Building 1 would be a four-story club house building. Buildings 2, 3, 4, 5, 6, and 7 would be three-story residential buildings over one story of parking (totaling four stories). Five of the proposed units would be restricted affordable units for Very Low

Communication from Public

Name: Andrew Brady

Date Submitted: 03/31/2022 03:10 PM

Council File No: 19-1603-S1

Comments for Public Posting: Please see the attached letter from the Applicant's representative, Andrew Brady of DLA Piper. Part 2 of 4 documents attached.

income households; as such, the Project is eligible for a density bonus of up to 22.5 percent and one incentive under the State Density Bonus Law and the City's Density Bonus Ordinance. (Ordinance No. 179,681.) As a multiple dwelling residential use, the Project is an allowable use in the RD1.5 zone. The RD1.5 zone requires a minimum area of 1,500 square feet per dwelling unit, establishing a base maximum density of 83 units for the Project Site (124,257 / 1,500). With the allowable 22.5 percent density bonus, a maximum of 102 dwelling units are allowed on the Project Site. The Project proposes 102 dwelling units and is therefore consistent with the maximum density restriction applicable to the Project Site under the LAMC. The Project would have a Floor Area Ratio (FAR) of 1.75:1 (185,385 square feet) and is therefore consistent with the Project Site's maximum FAR restriction under the LAMC of 3:1 (319,362 square feet). Height District 1 allows a maximum height of 45 feet in the RD1.5 zone. The Project would have a maximum height of 45 feet and is therefore consistent with the maximum height restriction. As proposed, the building footprints and envelopes are consistent with the applicable requirements of the underlying zone.

The General Plan designation in the South Los Angeles Community Plan for the Project Site is Low Medium II Residential, which is consistent with the Project Site's RD1.5 zoning and promotes multi-family residential uses such as the Project at densities and scales consistent with the Project, as set forth herein. The South Los Angeles Community Plan identified goals, objectives, policies, and programs to guide development in the community plan area, including residential projects. The Project satisfies the applicable goals, objectives, and policies of the South Los Angeles Community Plan including locating higher residential densities near commercial centers, transit stations, and bus routes (Policy 1-2.1), providing for the clustering of housing units to help decrease the cost of land per unit (Policy 1-5.4), and requiring that proposed development be designed to enhance and be compatible with adjacent development (Policy 1-8.4).

The Project Site is located in the North University Park-Exposition Park-West Adams NSO District, the purpose of which is to: (A) promote well planned housing to meet the needs of a college/university student housing, and the needs of the community; (B) address impacts of multiple-habitable room projects which may be incompatible with surrounding development; (C) encourage well-planned neighborhoods with adequate parking and to individually review proposed large multiple-habitable room projects; (D) assure that the project provides adequate on-site parking; and, (E) address a concentration of campus-serving housing in the vicinity. The Project would provide 100 five-bedroom and two three-bedroom apartment units (up to 506 bedrooms) of off-site housing located close to transit and amenities. The Project is located in an area surrounded by other residential uses and would be compatible with the surrounding environment. The Project would be required to provide 247 parking spaces pursuant to LAMC Section 12.22 A.25(d)(1)(III) – Affordable Parking Option 1, under the City's Density Bonus Ordinance. Parking Option 1 is consistent with the requirements of the State Density Bonus Law under Government Code Section 85915(p)(1)(A) – (C), which provide that the City cannot require parking ratios that exceed the rates of Parking 1 option where requested by a developer providing at least the minimum number of affordable housing units under the Density Bonus law. Consistent with these requirements, the Project would provide 255 spaces in a single-level podium parking structure below the residential buildings. For these reasons, the project would be consistent with the North University Park-Exposition Park-West Adams NSO District.

- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

The approximately 2.8-acre Project Site is located in the South Los Angeles Community Plan area within the city limits of Los Angeles. The Project Site is located within a previously developed portion of the University Park neighborhood, situated between a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, and a two-story commercial building to the south owned by the University of Southern California. The location is close to transit, as well as cultural, commercial/retail, and entertainment amenities. Therefore, the Project would occur within city limits on a site of no more than five acres substantially surrounded by urban uses.

- (c) The project site has no value as habitat for endangered, rare or threatened species.**

The Project Site is located in an urbanized area within the South Los Angeles Community Plan area. This site is currently developed and occupied by a two-story plaster building and accompanying surface parking lot with ornamental trees and landscaping. Existing development covers the majority of the Project Site. There are no special-status plant species observed within a 2-mile radius of the Project Site (California Natural Diversity Database, 2018). While occurrences of American Badger, Burrowing owl, and Southwestern willow flycatcher have been observed within a 2-mile radius of the Project Site (California Natural Diversity Database, 2018), the existing landscaping at the Project Site is ornamental and not expected to provide habitat for any special-status species. Further, the Project Site is in an urban area and heavily disturbed. Therefore, the Project Site has no value as habitat for endangered, rare, or threatened species. While ornamental landscaping may provide nesting habitat for native birds and temporary roosting habitat for tree-nesting bats, the applicant will be required to comply with existing laws and regulations that protect raptors and migrating birds. In accordance with standard City conditions of approval and in compliance with applicable regulatory standards, pre-construction surveys of all potential special-status bird nesting habitat in the area of construction disturbance would be required as a condition of approval if Project construction occurs during nesting season. Therefore, the Project would not result in any impacts to listed species or the degradation of habitat for endangered, rare, or threatened species.

- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The Project Site is currently developed and occupied by a two-story plaster building and associated surface parking lot and landscaping. The Project involves the demolition of the existing two-story plaster building and the construction of a multi-family residential development which would include 100 five-bedroom and two three-bedroom apartment units (up to 506 bedrooms) within six, four-story buildings and a four-story clubhouse building totaling 185,985 square feet. All construction-related impacts would be less than significant and temporary in nature. No permanent significant impacts are anticipated to occur.

Traffic

The Project Site occupies approximately 2.8 acres, or 124,257 square feet, and is developed with a two-story building, surface parking lot, and associated landscaping. The Project would demolish the existing building and replace it with a multi-family residential development which would provide off-campus student housing. The Los Angeles Department of Transportation (LADOT) analyzes potential project-generated traffic impacts by measuring traffic at selected intersections during typical weekday morning (7:00 AM to 10:00 AM) and afternoon (3:00 PM to 6:00 PM) peak hours, and then comparing these existing conditions with projections of present and future conditions, with and without the Project. The August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson, 2018) and the July 2018 *July 2018 Supplemental Analysis for 806 West Adams Boulevard* (Gibson 2019) determined that, after accounting for trip reduction credits, the Project would generate 1,158 net new trips to and from the Project Site on a typical weekday (see Attachment A). This would include 14 morning peak hour trips and 77 afternoon peak hour trips. The study conducted detailed analyses of the effect of these trips within study area that includes six intersections under Existing with Project Conditions and Future with Project Conditions. Under Existing with Project Conditions, the study determined that all intersections would continue to operate at a Level of Service (LOS D) or better during the analyzed peak hours (consistent with existing conditions). Under Future with Project Conditions, the study determined that incremental traffic increases resulting from the Project would not exceed the applicable thresholds of significance created by LADOT that are utilized by the City for CEQA traffic analyses, and thus would not result in a significant impact at any of the six intersections within the study area. Thus, the Project would not result in significant traffic and transportation impacts and no mitigation measures are required. The study also concluded, in accordance with the 2010 Los Angeles County Congestion Management Program (Metro, 2010) (CMP) guidelines, that the Project would not have a significant impact on the regional freeway, arterial, or regional transit system.

Noise

A significant impact would occur if the Project would result in exposure of persons to or generation of noise levels in excess of standards established in the General Plan or applicable provisions the City's noise ordinance. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. These regulations pertain to construction hours (LAMC Section 41.40). LAMC Section 41.40 specifies that no person shall, between the hours of 9:00 p.m. and 7:00 a.m. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure. In addition, the operation, repair or servicing of construction equipment and the delivery of construction materials to the Project Site shall be prohibited during the hours specified. Of particular relevance to the Project, LAMC Section 112.05 also specifies the maximum noise level of powered equipment or powered hand tools in residential land use zones. It states that between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level

exceeding 75 A-weighted decibels (dBA) for construction equipment at a distance of 50 feet. The 75 dBA noise limitation does not apply when compliance is not technically feasible. LAMC Section 112.02 prohibits air conditioning, refrigeration, heating, pumping, and filtering equipment from increasing existing average ambient noise levels by more than 5 dBA.

The August 2018 *Environmental Noise Study for the 806 W Adams Residential Project* (ICF, 2018) determined that the Project would comply with applicable LAMC noise regulations with proposed noise control methods incorporated into the construction process and Project design and operations (see Attachment B). Project construction activities would occur within the permitted hours established in LAMC Section 41.40, and noise levels generated from construction equipment would not exceed the maximum noise level of 75 dBA at noise-sensitive receptors located off-site after implementation of noise control methods in accordance with LAMC Section 112.05. During operations, the incorporation of noise control methods by the Project would ensure that all noise-generating mechanical equipment (e.g., heating, ventilation, and air conditioning equipment) would comply with the requirements of LAMC Section 112.02, and that noise from the Project's outdoor residential amenity spaces would comply with noise limits set forth in the LAMC. Additionally, groundborne vibration generated from the operation of heavy construction equipment at the Project Site would not reach levels that would result in building damage or human annoyance at off-site structures under widely-used standards produced by Caltrans. Furthermore, as a residential development the Project would not have any major sources of vibration during daily operations. Therefore, the Project would not result in any significant noise or groundborne vibration impacts.

Air Quality

The August 2018 *Air Quality Analysis for the 806 W Adams Residential Project* (ICF, 2018; see Attachment C) includes an analysis of the potential for short- and long-term air quality impacts associated with construction and operation of the Project. According to the Air Quality Analysis, Project construction would generate criteria pollutants, ozone precursor pollutants, and small amounts of Toxic Air Contaminants (TACs). However, emissions would not exceed South Coast Air Quality Management District (SCAQMD) regional mass emissions thresholds or localized significance thresholds, which are the CEQA thresholds of significance adopted for development projects utilized by the City. Project operation would also generate criteria pollutant and ozone precursor pollutants. However, emissions from long-term operations would not exceed the SCAQMD regional mass emissions thresholds or localized significance thresholds. Additionally, based on the traffic operations and volumes in the Project area, the Project would not create a Carbon Monoxide (CO) hot spot. Project construction and operations would also only produce small amounts of TACs that would not present a health risk to surrounding residents and the community as a whole. Minor odors may be produced during the construction period, such as from equipment exhaust and the application of architectural coatings, but any odors produced would be temporary and intermittent in nature, and would apply with applicable ordinances of the City and SCAQMD rules to minimize impacts. In light of the foregoing, the Project would not result a significant environmental impact regarding odors.

Further, the Project is consistent with the SCAQMD 2016 Air Quality Management Plan (AQMP), as it would not interfere with attainment of ambient air quality standards. Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment. The AQMP growth assumptions are based on SCAG's 2016-2040 RTP/SCS regional growth forecast. The Project is consistent with applicable growth protections under the 2016-2040 RTP/SCS and the South Los Angeles Community Plan. The Project's growth is also consistent with the 2016 RTP/SCS goals and objectives under SB 375 to implement "smart growth" and State efforts to meet goals in the reduction of greenhouse gases. The Project would not conflict with or obstruct implementation of the AQMP for the additional reason that, as stated above, its construction and operational emissions would all be less than significant. The Project's criteria pollutant emissions would thus not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment, or to cause the Air Basin to deteriorate from its current attainment status with respect to any other air pollutant emissions.

Water Quality

The mostly impervious Project Site contains a structure, surface parking lot, and perimeter open space/landscaping. The Project would demolish the existing two-story building and construct seven four-story buildings on a developed 2.8-acre site. A minimum of 25 percent of exterior the open space areas would be planted with ground cover including trees, shrubs and other surficial landscaping. The Project Site is not adjacent to any water sources. Construction would include Best Management Practices (BMPs) set forth in a stormwater pollution prevention plan (SWPPP) in accordance with the State Stormwater NPDES Construction General Permit administered by the State Water Resources Control Board (SWRCB), compliance with which would be regulated by the Los Angeles Regional Water Quality Control Board. BMPs would reduce both stormwater and non-stormwater discharges during construction and would minimize the mobilization of sediment to storm drains. The Project would also be subject to and would comply with the applicable provisions of LAMC Chapter IV, Article 4.4, Stormwater and Urban Runoff Pollution Control, which prohibits the entry of illicit discharges into the municipal storm drain system. The City would also require the Project to comply with *Development Best Management Practices Handbook, Part A: Construction Activities*, 3rd edition.² In addition, BMPs would be required during general operation of the project to ensure that storm water runoff meets the established applicable water quality standards and waste discharge requirements. Among the LAMC regulatory requirements, the Project would also adhere to requirements established by Ordinance No. 181,899 ("LID Ordinance") which expanded the applicability of the former Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater Low Impact Development (LID) strategies on projects that require building permits. The City's LID Ordinance mandates that the Project include design approaches and BMPs that are designed to address runoff and pollution at the source. To this end, LID is implemented through BMPs that fall into four categories: site planning BMPs, landscape BMPs, building BMPs, and street and alley BMPs. The goal of these

² City of Los Angeles, *Best Management Practices Handbook, Part A*, available at: http://www.lastormwater.org/wp-content/files_mf/parta.pdf, Accessed July 19, 2018.

LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. The LID Ordinance requires the capture and management of the greater of an 88th percentile rain event or the first 0.75-inch of runoff flow during storm events defined in the City's LID BMP handbook, through one or more of the City's preferred LID improvements in priority order: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs. The Project applicant would be required to prepare and implement a stormwater mitigation plan and incorporate stormwater mitigation measures into the design plans in accordance with the above regulatory requirements for the City to review and approve before a building permit for the Project is issued. As a result of compliance with these regulatory requirements, the Project would not result in the degradation of stormwater runoff and would not result in significant impacts relating to water quality.

(e) The site can be adequately served by all required utilities and public services.

The Project Site occupies approximately 2.8 acres in an urbanized area within the South Los Angeles Community Plan area and is currently developed with a two-story building, surface parking lot, and associated landscaping. The Project Site is served by all required utilities and public services.

Utilities

The Los Angeles Department of Water & Power (LADWP) would provide water service to the Project Site. The existing water supply system serving the Project Site includes a 12-inch line in Adams Boulevard and an 8-inch line in University Avenue. The existing uses at the Project Site consume approximately 755,000 gallons of water per year (425,000 gallons for indoor use and 330,000 gallons for outdoor use). The Project is estimated to consume approximately 12,642,000 gallons of water per year (12,122,000 gallons for indoor use and 520,000 gallons for outdoor use), resulting in a net increase of approximately 11,515,000 gallons per year (NAI 2018). An engineering review of the Project Site determined that there is expected capacity within the water system to serve the Project, and offsite improvements are not anticipated (CCE 2018). If improvements are required to provide adequate water pressure, looping and booster pumps are expected to be adequate to meet domestic and fire demands. The Project would be subject to LADWP and Los Angeles Fire Department (LAFD) review to ensure that facilities are adequate to meet the domestic and fire water demands of the Project. Furthermore, LADWP provided a Water Availability-Will Serve letter confirming that the Project can be supplied with water from the municipal system (LADWP 2018a). Therefore, the Project can be adequately served by the water system.

The Project Site is connected to wastewater infrastructure maintained by the Los Angeles Department of Public Works, Bureau of Sanitation (LA Sanitation), which conveys wastewater to the Hyperion Water Reclamation Plant. The Project Site connects to the sewer system at the corner of University Avenue and 27th Street via an 8-inch sewer line that extends south down University Avenue to 28th Street where it increases to a 12-inch sewer line before connecting with a 24-inch main at 30th Street (CCE 2018). The existing uses at the Project Site generate approximately 425,000 gallons of wastewater annually, and the Project is estimated to generate approximately 13,000,000 gallons of wastewater annually (NAI 2018). Thus, the Project would result in an annual increase of 12,575,000

gallons of wastewater generated at the Project Site. The Project Applicant would be required to obtain approval from LA Sanitation confirming that the wastewater infrastructure in the area is adequate to meet the wastewater demands of the Project before any project construction can commence. An engineering review of the Project determined that, if required, offsite capacity improvements are expected to be limited to the 8-inch and possibly 12-inch sections of the sewer line in University Avenue. Due to the limited extent of the anticipated improvements (approximately 400 feet along each segment), significant environmental impacts would not occur. Therefore, the Project can be adequately served by the wastewater system.

Electricity service is provided to the Project Site by LADWP. Underground distribution lines exist within Adams Boulevard, with overhead poles at the corner of University Avenue and 27th Street. Existing electricity consumption at the Project Site is 300,000 kilowatt hours (kWh) annually and the Project is estimated to consume approximately 2,500,000 kWh annually (NAI 2018). Thus, the Project would result in an annual increase of approximately 2,200,000 kWh of electricity consumed at the Project Site. An engineering review of the Project determined that there is adequate capacity to serve the Project's estimated electricity demand (CCE 2018). Furthermore, LADWP provided a Will Serve letter confirming that electric service is available and that the estimated electricity demand for the Project has been taken into account in the planned growth of the power system (LADWP 2018b). Therefore, the Project can be adequately served by the electricity system.

The Southern California Gas Company (SoCalGas) provides natural gas service to the Project Site. The Project Site is served by an existing 8-inch gas line in Adams Boulevard and a 2-inch gas line in 27th Street (CCE 2018). Existing natural gas consumption at the Project Site is 2,800 million British Thermal Units (MMBtu) annually and the Project is estimated to consume approximately 14,900 MMBtu annually (NAI 2018). Thus, the Project would result in an annual increase of approximately 12,100 MMBtu of natural gas consumed at the Project Site. SoCalGas provided a Will Serve letter confirming that the SoCalGas has facilities in the area that can adequately serve the Project (SoCalGas 2018). Therefore, the Project can be adequately served by the natural gas system.

Public Services

The Los Angeles Fire Department (LAFD) provides fire service to the Project Site. The LAFD has 3,216 sworn personnel and 379 civilian fire personnel (LAFD 2018a). The Project would be served by Fire Station 15, located at 3000 Hoover Street, approximately 0.23 miles from the Project Site (LAFD 2018b). The Project would be required to comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9) and the Fire Code (Chapter 7) as well as Section 57.507.3.1 of the LAMC regarding fire flow requirements. Compliance with these requirements would be demonstrated as part of a plot plan that would be submitted to LAFD for review and approval prior to the issuance of a building permit. The residential use proposed by the Project would be consistent with surrounding uses and would not represent a unique or substantial fire hazard. Therefore, the Project can be adequately served by the LAFD.

The Los Angeles Police Department (LAPD) provides police service to the Project Site. The LAPD has 9,867 sworn officers and averages 21 officers per square mile (LAPD

2018). The Project would be served by the Southwest Community Police Station which is located less than two miles from the Project Site and employs 352 sworn personnel and 32 civilian personnel serving a community of over 165,000 people (LAPD 2018). In addition, the Project Site is also within the service area of the USC campus safety department. USC has one of the largest campus public safety departments in the United States, with 306 full-time personnel and 30 part-time student workers (USC 2018b). While the Project would introduce a new residential population to the Project Site and therefore increase the service population in the area, the increased demand for LAPD services would be offset by the USC campus safety department. Furthermore, the Project would incorporate security measures (e.g., restricted access and surveillance) and would be designed in accordance with the LAPD's "Design Out Crime" guidelines, which incorporate Crime Prevention Through Environmental Design (CPTED) techniques. Therefore, the Project can be adequately served by the LAPD.

The Los Angeles Unified School District (LAUSD) provides school service to the Project Site. LAUSD enrolls more than 640,000 students in over 900 schools and 187 public charter schools (LAUSD 2018a). The Project Site is located in LAUSD's Central District (LAUSD 2018b). Because the Project would provide off-site campus housing for USC students, the number of Project-generated elementary, middle, or high school students would be expected to be minimal. Furthermore, the Project Applicant would be required to pay developer fees to the LAUSD in accordance with Senate Bill 50 which would offset impacts to schools. Therefore, the Project can be adequately served by the LAUSD.

The Los Angeles Public Library (LAPL) provides library service to the Project Site. There are five LAPL branches/libraries within 2.5 miles of the Project Site: the Pico Union Branch Library is 1.5 miles from the Project Site; the Dr. Mary McLeod Bethune Regional Library is 1.86 miles from the Project Site; the Vermont Square Branch Library is 2.16 miles from the Project Site; the Junipero Serra Branch Library is 1.92 miles from the Project Site; and the Leon H. Washington Jr. Memorial Branch Library is 2.32 miles from the Project Site (LAPL 2018). In addition, because the Project would provide off-site campus housing for USC students, it is anticipated that the majority of Project residents would have access to USC library facilities. USC has an extensive library system which includes 20 specialized libraries, special collections, and archives which the students could access (USC 2018). While the Project would introduce a new residential population to the Project Site and therefore increase the service population in the area, the increased demand for LAPL services would be offset by USC library facilities. Therefore, the Project can be adequately served by the LAPL.

Exceptions to the use of Categorical Exemptions:

Planning staff evaluated the exceptions to the use of Categorical Exemptions for the proposed project listed in "CEQA Guidelines" Section 15300.2 and determined that none of the exceptions apply to the proposed project as described below:

- A. *Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply [sic] all instances, except where the project may impact on an*

environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

Because the Project is not defined as a Class 3, 4, 5, 6 or 11 project, this exception is inapplicable. The Project Site is in an urbanized area in the City of Los Angeles. The Project Site is located in a previously developed lot within a dense and highly developed urban area and is not located in a particularly sensitive environment. No wetlands, wildlife habitats, or endangered species are present on or near the Project Site; therefore, this exception is not applicable to the Project.

B. *Cumulative Impact.* All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The Project Site is previously developed and located in an urbanized area surrounded by other residential uses, in addition to some education and commercial uses. The Project is consistent with the South Los Angeles Community Plan as well as zoning and the requirements of the LAMC. As discussed above, the Project's impacts on biological resources would be less than significant as the Project Site has no value as habitat and standard pre-construction surveys would ensure that special-status species are not present in the onsite trees or landscaping that would be impacted prior to construction activities. The Project's impact on water quality would be less than significant as the project would adhere to all applicable laws and ordinances which would require LID features incorporated into the project design and stormwater BMPs to reduce potential impacts related to stormwater runoff during construction. The Project is not located on or visible from a scenic highway nor would the Project lead to a substantial adverse change in the significance of a historic resource, as determined by the Project's Phase 1 Historical Resource Assessment Report, 806 W. Adams Blvd. (Historic Resources Group, 2018). The Limited Phase I ESA for the Project Site determined there is a low probability of encountering hazardous materials at the Project Site. The Project would be served by existing utility lines and existing public services. The *Traffic Impact Study* (Gibson, 2018) considered the Project's contributions to traffic and determined them to be less than significant. The TIS also considered the Project's potential cumulative impacts, considering the Project's contributions to all future cumulative traffic growth (including related projects and ambient traffic growth) and determined them to be less than significant. Similarly, the Project's *Air Quality Analysis* (ICF, 2018) determined that the Project construction emissions would not exceed SCAQMD's regional mass or localized significance thresholds. Project operation emissions would not exceed SCAQMD's regional mass or localized significance thresholds and the Project would not result in any significant air quality impacts. Therefore, the Project's impacts as a whole would be less than significant and are not cumulatively considerable.

The immediate vicinity of the Project Site is undergoing intensification. There are over 70 related projects within a 1.5-mile radius of the Project Site, including at 2455 S Figueroa Street (145 apartments), 3101 S Figueroa Street (275 hotel rooms), 243 W Adams Boulevard (300 apartment units), and 505 W 31st Street (7 story student housing building). The related project closest to the Project Site is at 2716 S Severance Street (a 9,955-square foot child care center), directly south of the Project Site. Based on a review of the types and locations of the related projects, and considering the less-than-significant impacts that would result from the Project, the Project would not make a cumulatively considerable contribution to any significant cumulative impacts when considering it along

with other related present, past, and reasonably foreseeable future projects. Therefore, this exception is not applicable to the Project.

- C. Significant Effect Due to Unusual Circumstances. *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

This exemption does not apply to the Project. The Project Site is approximately 2.8 acres (124,257 square feet) and located within a highly urbanized area of the City of Los Angeles that includes residential uses with similar sizes and scale to the Project. The use and operations of the Project are compatible with surrounding residential development and consistent with the underlying zoning for the Project Site. The Project Site does not demonstrate any unusual circumstances, and the Project will not generate significant traffic, noise, or air quality impacts period, and therefore it will not produce any such impacts due to unusual circumstances. The Project Site is typical of residential urban infill development sites in transit priority areas, and neither the Project Site itself nor any of its surroundings, which consist of residential, commercial, and educational uses, present any uses, features or conditions that could reasonably be considered unusual as compared to the standard type of urban infill development the Class 32 exemption covers generally and in the more specific context of the urban environment in which the Project Site is located. Additionally, the residential use proposed by the Project is a typical use in the area, which is made up of mostly residential uses. Thus, there are no unusual circumstances that indicate that the Project would result in any significant impacts. Therefore, the unusual circumstances exception is not applicable to the Project.

- D. Scenic Highway. *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

The Project Site is not located on or near a portion of eligible and/or officially designated state or county scenic highway. According to the California Scenic Highway Mapping System (California Scenic Highway Mapping System, 2018), the closest eligible and/or officially designated roadway is the Arroyo Seco Historic Parkway (State Route 110) which begins near Dodger Stadium, approximately 2.87 miles north of the Project Site. The Project Site is not visible from this portion of the highway and the highway is not visible from the Project Site. Therefore, this exception is not applicable to the Project.

- E. Hazardous Waste Site. *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

This exception is not applicable to the Project. An environmental database search was conducted as part of the August 2018 *Limited Phase I Environmental Site Assessment* for the 806 W Adams Residential Project (ICF, 2018; see Attachment D) to determine whether the Project Site or the area immediately surrounding the Project Site is included within the categories of sites on the list compiled pursuant to Government Code Section 65962.5 (the "Cortese List"). The Cortese List is compiled from several sources, which include, without limitation, underground storage tank and storage tank cleanup sites, solid waste disposal sites, and sites that are subject to various types of regulatory cleanups. The reviewed databases included federal and state American Society for Testing and Materials

(ASTM)-standard databases compiled pursuant to Section 65962.5 of the Government Code. The Project Site was not identified in any of the environmental database searches conducted as part of the Limited Phase I ESA. Eleven offsite properties were identified within a 0.50 mile radius of the Project Site. Of the 11 sites, two have been granted closure as they were deemed properly assessed and remediated (if necessary) by the oversight agency. No violations were identified with the remaining nine sites. The Limited Phase I ESA determined that there is a low probability of encountering contamination on the Project Site due to historical releases at these sites, none of which are adjacent to the Project Site. Additionally, aerial photographs and topographic maps reviewed did not present information that would indicate a potential hazardous material impact to the Project Site due to past uses, nor did the aerial photographs reveal any staining or equipment or other features that might indicate contamination sources or releases. Further, a site reconnaissance visit did not identify any hazardous materials or conditions. Therefore, this exception is not applicable to the Project.

- F. Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The Project would not cause a substantial adverse change in the significance of a historical resource. The Project Site contains one two-story building, a small storage shed, a portion of a courtyard, and a surface parking lot. The Project Site is flanked to the east, south, and west by multi-family residential buildings and to the southwest by USC's UPC Child Development Center. The Project Site is not located in a designated Historic Preservation Overlay Zone or on a site designated as historic on any federal, state, or local database. The existing two-story building was designed and constructed in 1971. The June 14, 2018 *Phase 1 Historical Resource Assessment Report, 806 W. Adams Blvd* (Historic Resources Group, 2018; see Attachment E) determined that, based on visual observation, research of primary and secondary sources, and an analysis of established eligibility criteria, the existing onsite building is not eligible for historic designation at the local, state, or national level; therefore, demolition of the existing on-site uses and construction of the Project would not constitute a substantial adverse change in the significance of a historic resource as defined by CEQA. For these reasons, this exception is not applicable to the Project.

Conclusion:

As outlined above, the Project is located in an urbanized area, which is not a particularly sensitive environment, and will not impact an environmental resource of hazardous or critical concern that is designated, precisely mapped, or officially adopted by any federal, state, or local agency. The Project will not result in any significant impacts and will not make a cumulatively considerable contribution to any significant cumulative impacts. The Project is an allowable multi-family residential use, is consistent with the surrounding developments, does not present any unusual circumstances that would result in significant environmental impacts, nor would it constitute a substantial adverse change in the significance of a historic resource as defined by CEQA. Therefore, none of the possible exceptions to Categorical Exemptions, found in CEQA Guidelines Section 15300.2 apply to the Project. The Project is consistent with the existing General Plan designation, zoning, and other applicable requirements of the LAMC. The Project would not generate a significant number of vehicle trips and will not result in any significant impacts to land use planning, habitat, noise, air quality, or water quality and therefore will not make a considerable contribution to any significant cumulative traffic, air quality, or noise impacts. As such, the Project qualifies for a Class 32 Categorical Exemption.

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Memorandum

To:	City of Los Angeles Department of City Planning
From:	Heidi Mekkelson, ICF
Date:	July 16, 2019
Re:	Supplemental Environmental Analysis for the 806 W. Adams Boulevard Residential Project

This supplemental memorandum assesses the potential for additional environmental impacts resulting from the addition of three dwelling units and 11 bedrooms to the 806 W. Adams Boulevard Residential Project (Project), and determines whether the Project revisions would change the conclusions presented in the Class 32 Categorical Exemption memorandum prepared for the Project by ICF on October 3, 2018. As demonstrated herein, the Project revisions would not alter the conclusions presented in the Class 32 Categorical Exemption memorandum. Thus, the Project as revised still qualifies for a Class 32 Categorical Exemption from review under the California Environmental Quality Act (CEQA).

Original Project

As previously analyzed, the Project would demolish the existing on-site building and parking lot and construct 99 five-bedroom rental flats within six, three-story buildings over a single-level podium parking structure, totaling four stories at 806 W. Adams Boulevard (Project Site) in the City of Los Angeles (City). Five of the units would be restricted affordable units for Very Low Income households. An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the Project would construct 183,150 square feet of new floor area. The seven buildings would sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 255 vehicle parking spaces for off-street parking. Vehicular access to the Project Site would be provided via a full access driveway (accommodating both right-turn and left-turn ingress/egress movements) located on Severance Street and a restricted access driveway (accommodating only right-turn ingress/egress movements) located on Adams Boulevard. The driveways would be designed to Los Angeles Department of Transportation (LADOT) standards under the review of City staff.

Project Modifications

Subsequent to the preparation of environmental technical studies and an October 5, 2018 memorandum demonstrating that the Project qualifies for a Class 32 Categorical Exemption from review under CEQA, the Project was revised to provide three additional dwelling units with up to 11 additional bedrooms. Two of the three additional units would be restricted affordable units at the City's Workforce housing level. The Project modifications would increase the total number of units from 99 to 102 dwelling units, from

195 rooms to up to 506 bedrooms. The Project would maintain the same height, massing and footprint, with the three additional units provided at the ground level via an internal building reconfiguration. However, the additional three units would result in additional floor area, for a total of 105,985 square feet and a floor area ratio (FAR) of 1.75:1. Construction phasing and activities would not change.

CLASS 32 CATEGORICAL EXEMPTION

To qualify for a Class 32 Categorical Exemption under CEQA, a project must meet the five conditions listed below.

- (a) **The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.**

The Class 32 Categorical Exemption Memorandum concluded that the Project is consistent with the applicable general plan designation and policies as well as the zoning designations and regulations.

Project Modifications

The addition of the three units to the Project would not change the Project's consistency with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The modified Project proposes the demolition of an existing two-story plaster classroom and office building and the construction of a multi-family residential development that would include 102 rental flats (up to 506 bedrooms) within six residential buildings and one clubhouse building totaling 185,985 square feet of new development. Building 1 would be a four-story club house building. Buildings 2, 3, 4, 5, 6, and 7 would be three-story residential buildings over one story of parking (totaling four stories). Eight of the proposed units would be restricted affordable units; as such, the Project is eligible for a density bonus of up to 22.5 percent and one incentive under the State Density Bonus Law and the City's Density Bonus Ordinance. (Ordinance No. 179,681.) As a multiple dwelling residential use, the Project is an allowable use in the RD1.5 zone. The RD1.5 zone requires a minimum area of 1,500 square feet per dwelling unit, establishing a base maximum density of 83 units for the Project Site (124,257 / 1,500). With the allowable 22.5 percent density bonus, a maximum of 102 dwelling units are allowed on the Project Site. The Project proposes 102 dwelling units and is therefore consistent with the maximum density restriction applicable to the Project Site under the Los Angeles Municipal Code (LAMC) and the State Density Bonus law. The Project would have a Floor Area Ratio (FAR) of 1.75:1 (105,985 square feet) and is therefore consistent with the Project Site's maximum FAR restriction under the LAMC of 3:1 (319,362 square feet). Height District 1 allows a maximum height of 45 feet in the RD1.5 zone. The Project would have a maximum height of 45 feet and is therefore consistent with the maximum height restriction. The Project requests one allowed Density Bonus incentive of a 20 percent reduced rear yard setback, which the Project proposes to utilize, reducing the required 15 foot rear yard setback to 12 feet. As proposed, the building footprints and envelopes are consistent with the applicable requirements of the underlying zone. The project would also provide bicycle parking in excess of LAMC requirements and vehicle parking consistent with LAMC and State Density Bonus Law requirements.

- (b) **The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

The Class 32 Categorical Exemption Memorandum concluded that the Project is within city limits on a project site of no more than five acres substantially surrounded by urban uses.

Project Modifications

The addition of the three units to the Project would not alter the size or location of the Project Site, which is 2.8 acres in the South Los Angeles Community Plan area within the city limits of Los Angeles. The Project Site is situated between a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, and a two-story commercial building to the south owned by the University of Southern California.

- (c) **The project site has no value as habitat for endangered, rare or threatened species.**

The Class 32 Categorical Exemption Memorandum concluded that the Project Site has no value as habitat for endangered, rare, or threatened species due to the location in an urbanized area and that there were no special-status plant species observed within a 2-mile radius of the Project Site (California Natural Diversity Database, 2018).

Project Modifications

The revisions to the Project would not alter the characteristics of the Project Site with respect to its value as habitat for endangered, rare, or threatened species. In accordance with standard City conditions of approval and in compliance with applicable regulatory standards, pre-construction surveys of all potential special status bird nesting habitat in the area of construction disturbance would be required as a condition of approval if Project construction occurs during nesting season.

- (d) **Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The Project Site is currently developed and occupied by a two-story plaster building and associated surface parking lot and landscaping. The Project involves the demolition of the existing two-story plaster building and the construction of a multi-family residential development which would include 102 rental flats (up to 306 bedrooms) within six, four-story buildings and a four-story clubhouse building totaling 185,985 square feet. All construction-related impacts would be less than significant and temporary in nature. No permanent significant impacts are anticipated to occur.

Traffic

As discussed in the Class 32 Categorical Exemption Memorandum, the August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson, 2018) concluded that the Project would not result in a significant impact at any of the six intersections within the study area. The study also concluded that the Project would not have a significant impact on the regional freeway, arterial, or regional transit system.

Modified Project

The July 2019 *Supplemental Analysis for 806 West Adams Boulevard* (Gibson 2019), attached to this memorandum as **Attachment A**, analyzed the potential for traffic-related effects resulting from the addition of the three units and up to eleven bedrooms to the Project. After accounting for trip reduction credits in accordance with LADOT methodology, the Project would generate 1,158 net new trips to and from the Project Site on a typical weekday (see Attachment A). This would include net increases of 14 morning peak hour trips and 77 afternoon peak hour trips relative to existing conditions. The supplemental analysis conducted detailed analyses of the effect of these trips within study area that includes six intersections under Future with Project Conditions. Under Future with Project Conditions, the supplemental analysis determined that incremental traffic increases resulting from the proposed revisions to the Project would not exceed the applicable thresholds of significance created by LADOT that are utilized by the City for CEQA traffic analyses, and thus would not result in a significant impact at any of the six intersections within the study area. Thus, the revised Project would not result in significant traffic and transportation impacts and no mitigation measures are required. The supplemental analysis also concluded that the Project would not have a significant impact on the regional freeway, arterial, or regional transit system.

Noise

As discussed in the Class 32 Categorical Exemption Memorandum, the August 2018 *Environmental Noise Study for the 806 W Adams Residential Project* (UC, 2018) concluded that the Project would comply with applicable LAMC noise regulations with proposed noise control methods incorporated into the construction process and Project design and operations. Project construction activities would occur within the permitted hours established in LAMC Section 41.40, and noise levels generated from construction equipment would not exceed the maximum noise level of 75 dBA at noise-sensitive receptors located off-site after implementation of noise control methods in accordance with LAMC Section 112.05. During operations, the incorporation of noise control methods by the Project would ensure that all noise-generating mechanical equipment (e.g., heating, ventilation, and air conditioning equipment) would comply with the requirements of LAMC Section 112.02, and that noise from the Project's outdoor residential amenity spaces would comply with noise limits set forth in the LAMC. Additionally, groundborne vibration generated from the operation of heavy construction equipment at the Project Site would not reach levels that would result in building damage or human annoyance at off-site structures under Caltrans' published standards relied on by the City. Furthermore, as a residential development, the Project would not have any major sources of vibration during daily operations. Therefore, the Project was determined to not result in any significant noise or groundborne vibration impacts.

Modified Project

The addition of the three units to the Project would not change the building massing, height, overall building design, the types of construction activities, or the duration of construction activities. A revised façade design is proposed that would not alter the building massing, construction process, or construction timeline from the original design. All construction activities would continue to occur within the permitted hours established in LAMC Section 41.40, and noise levels generated from construction equipment would not exceed the maximum noise level of 75

dBA at noise-sensitive receptors located off-site after implementation of noise control methods in accordance with LAMC Section 112.05. Project operations would involve the implementation of the noise control methods identified in the August 2018 *Environmental Noise Study for the 806 W Adams Residential Project* to ensure that all noise-generating mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] equipment) would comply with the requirements of LAMC Section 112.02. The Project revisions would not change the location or maximum occupancy of the outdoor pool or other outdoor spaces and would also not change the location of HVAC equipment such that increased noise from Project operations would result. Because the addition of the three units to the Project would not change the types and locations of construction activities at the Project Site, no change in groundborne vibration impacts would result from what was previously analyzed. Accordingly, the Project as revised would not result in significant noise or vibration impacts.

Air Quality

As discussed in the Class 32 Categorical Exemption Memorandum, the August 2018 *Air Quality Analysis for the 806 W Adams Residential Project* (CER, 2018) concluded that Project construction would generate criteria pollutants, ozone precursor pollutants, and small amounts of Toxic Air Contaminants (TACs). Such emissions would not exceed South Coast Air Quality Management District (SCAQMD) regional mass emissions thresholds or localized significance thresholds. Project operation would also generate criteria pollutant and ozone precursor pollutants. However, emissions from long-term operations were determined not to exceed the SCAQMD regional mass emissions thresholds or localized significance thresholds, or create a Carbon Monoxide (CO) hotspot. The Project was also determined to be consistent with the SCAQMD 2016 Air Quality Management Plan (AQMP), as it is consistent AQMP growth assumptions and the Southern California Association of Governments' 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) regional growth forecast and smart growth policies and objectives.

Modified Project

The addition of the three units to the Project would not change the building massing, building design, the types of construction activities and construction equipment, or the duration of construction activities. As such, there would be negligible changes in construction-period emissions of criteria pollutants, ozone precursor pollutants, and TACs. Long-term operational effects associated with the three additional residential units are likely to result in increased air pollutant emissions; however, the increase would be marginal. Given that the operational emissions identified in the *Air Quality Analysis for the 806 W Adams Residential Project* were well below the SCAQMD regional mass emissions thresholds and localized significance thresholds, the addition of three units would not result in exceedances of such thresholds. Based on the supplemental traffic analysis, the modified Project would not create a Carbon Monoxide (CO) hotspot, as the traffic volumes generated by the modified Project would be well below the volumes of the most congested intersections in the region. These worst-case intersections were demonstrated not to result in a violation of CO standards in the 2003 AQMP. Project construction and operations would also only produce small amounts of TACs that would not present a health risk to surrounding residents and the community as a whole, and would not require the preparation of a Health Risk Assessment. The modified Project would also remain consistent with

the SCAQMD 2016 AQMP as well as the SCAG 2016-2040 RTP/SCS growth forecasts and smart growth policies and objectives. Overall the prior conclusions of the October 2018 Class 32 Categorical Exemption memorandum would not change with the addition of three residential units.

Water Quality

As discussed in the Class 32 Categorical Exemption Memorandum, a minimum of 25 percent of exterior the open space areas would be planted with ground cover including trees, shrubs and other surficial landscaping. Project construction would include Best Management Practices (BMPs) set forth in a stormwater pollution prevention plan (SWPPP) in accordance with the State Stormwater NPDES Construction General Permit administered by the State Water Resources Control Board (SWRCB), compliance with which would be regulated by the Los Angeles Regional Water Quality Control Board. BMPs would reduce both stormwater and non stormwater discharges during construction and would minimize the mobilization of sediment to storm drains. The Project would also comply with LAMC provisions related to stormwater and urban runoff pollution and Low Impact Development (LID) strategies on projects that require building permits. The Project applicant would be required to prepare and implement a stormwater mitigation plan and incorporate stormwater mitigation measures into the design plans in accordance with the above regulatory requirements for the City to review and approve before a building permit for the Project is issued. As a result of compliance with these regulatory requirements, the Project was determined not to result in the degradation of stormwater runoff and would not result in significant impacts relating to water quality.

Modified Project

The addition of the three units to the Project would not change the commitment to plant 25 percent of exterior the open space areas with ground cover including trees, shrubs and other surficial landscaping. The building footprint would also not change, so there would be no change in open space with the modified Project. The modified Project would comply with all requirements related to the protection of water quality during the construction period and following the completion of construction, and impacts to water quality would be less than significant.

(c) The site can be adequately served by all required utilities and public services.

As discussed in the Class 32 Categorical Exemption Memorandum, the Project Site was determined to be adequately served by all required utilities and public services. Estimates of water (indoor and outdoor), wastewater, electricity, and natural gas were provided to the appropriate utility providers, and letters confirming service availability were provided. The Project Site was also determined to be adequately served by the Los Angeles Fire Department (LAFD), Los Angeles Police Department (LAPD), Los Angeles Unified School District (LAUSD), and Los Angeles Public Library (LAPL).

Modified Project

The addition of the three units to the Project would marginally increase the amount of indoor water use, wastewater, electricity, and natural gas consumed at the Project Site by approximately

3 percent compared with the original Project based on the increased number of residents (this is a conservative assumption in light of the smaller unit sizes of 2 of the 3 new units).¹ Based on this conservative analysis, total water use is estimated to increase from 12,270,000 to 12,642,000 gallons annually (indoor water use would increase to 11,750,000 gallons per year and outdoor water use would remain at approximately 520,000 gallons per year). Total new wastewater generation would increase to approximately 13 million gallons per year from 12,674,250 gallons per year, electricity consumption would increase to just under 2.5 million kilowatt-hours per year, and natural gas use would increase to approximately 14,000 million British Thermal units per year. Estimated increases in the demand for utilities are minor increases, and the needs of the modified Project could continue to be met with existing facilities. Any minor system upgrades that may be required would be determined at the final building design phase and the applicant would be obligated to fund any such improvements. The additional three units would involve a slightly higher population living at the Project Site, but the increase would be minor and residents would continue to be adequately served by LAPD, LAPD, LAUSD, and LAPL, as previously analyzed in the October, 2018 Class 32 Categorical Exemption memorandum, with supplemental security and library services provided through the University of Southern California.

Exceptions to the Use of Categorical Exemptions:

The exceptions to the use of Categorical Exemptions identified in Section 15300.2 of the State CEQA Guidelines were evaluated for the Project as revised. The October, 2018 Class 32 Categorical Exemption memorandum determined that none of the exceptions apply to the proposed Project. The location would not be altered as a result of the proposed revisions to the Project. With the addition of three units there would be no change regarding the absence of any potential for cumulative impacts from successive projects of the same type in the same place over time. There would be no change regarding the absence of a potential for significant effects due to unusual circumstances. There would be no change regarding the absence of potentially significant effects on scenic highways, hazardous waste sites, and historical resources. Therefore, none of the exceptions to the use of Categorical Exemptions identified in Section 15300.2 of the State CEQA Guidelines would apply to the Project as revised.

Summary and Conclusions

The modifications to the Project do not alter the conclusions presented in the Class 32 Categorical Exemption memorandum prepared for the Project by ICF on October 5, 2018. Specifically, the Project as revised continues to be located in a highly urbanized area that is not a particularly sensitive environment. The Project was previously determined to be consistent with applicable General Plan and zoning policies, to occur on an urban site of less than five acres, to have no value as habitat for endangered, rare, or threatened species, to not result in any significant environmental effects relating to traffic, noise, air quality or water quality, and to be able to be served by existing public utilities and services. The minor revision to the Project of the addition of three residential units does not alter any of the prior conclusions.

¹ All estimates of utility demand are based on scaling estimates provided by CCE Design Associates and NAI Consulting Engineers for the Project to account for the additional three units.

Also, as with the Project as originally analyzed, the Project as revised does not present any unusual circumstances that would result in significant environmental impacts, nor would it constitute a substantial adverse change in the significance of a historic resource as defined by CEQA, nor would it result in a significant cumulative impact from successive projects of the same type in the same place over time. Therefore, none of the possible exceptions to Categorical Exemptions found in CEQA Guidelines Section 15300.2 apply to the Project as revised. As such, the revised Project qualifies for a Class 32 Categorical Exemption.

References

- California Air Resources Board. 2004. 2004 Revision to the California State Implementation Plan for Carbon Monoxide, Updated Maintenance Plan for Ten Federal Planning Areas. July 22.
- California Natural Diversity Database. 2018. Plant and Animal Occurrences within 2 Miles of Project Site.
- CCL Design Associates Inc. 2018. Letter to Greg Beck regarding adjacent and existing utilities at 806 West Adams. August 7.
- Gibson Traffic Consulting, Inc. 2018. Draft Transportation Impact Study for the 806 W. Adams Boulevard Residential Project.
- ICF. 2018. Air Quality Analysis for the 806 W. Adams Residential Project.
- ICF. 2018. Environmental Noise Study for the 806 W Adams Residential Project.
- NAI Consulting Engineers (NAI). 2018. Email communication regarding utility usage at 806 Adams. August 14.

ATTACHMENT A: SUPPLEMENTAL TRANSPORTATION ANALYSIS



TECHNICAL MEMORANDUM

TO: Greg Beck, Champion Real Estate
FROM: Brian Hartshorn
DATE: July 1, 2019
RE: Supplemental Analysis for
806 West Adams Boulevard
Los Angeles, California

Ref: J1578

Gibson Transportation Consulting, Inc. was asked to conduct a supplemental analysis to determine if adding units to the 806 West Adams Boulevard project (Project) would result in traffic impacts based on Los Angeles Department of Transportation (LADOT) threshold criteria.

PROJECT DESCRIPTION

LADOT approved the initial transportation impact study prepared for this Project on August 29, 2018. The initial Project was composed of 99 student housing units with up to 495 bedrooms.

Since that time, the Project has been revised to include more units and bedrooms and the Applicant would like to determine whether the added units/bedrooms will trigger any traffic impacts and require mitigation. The revised Project includes 102 student housing units (three additional units) with up to 506 bedrooms (11 additional bedrooms).

TRIP GENERATION & ASSUMPTIONS

Using the same trip generation procedures and assumptions as in the approved transportation impact study, the additional units were added to the overall land use program. The trip assignment to off-site intersections is also consistent with the approved study.

Table 1 summarizes the trip generation for the revised Project with the added bedrooms.

TRAFFIC ANALYSIS

Consistent with the approved transportation impact study, an evaluation of the potential impacts was conducted to determine whether the added units result in traffic impacts per *Transportation Impact Study Guidelines* (LADOT, December 2016) (Guidelines).

Mr. Greg Beck
July 1, 2019
Page 2

An analysis was conducted for the same intersections identified in the approved study and the results for the revised Future with Project scenario are summarized in Table 2. As shown, the addition of 11 bedrooms does not trigger intersection impacts based on the Guidelines. As with the original Project density, the revised Project does not result in off-site traffic impacts and is not required to provide traffic mitigation.

The level of service worksheets are provided in the Attachment.

SUMMARY

Per the trip generation and traffic analyses conducted consistent with the assumptions from the approved study, the addition of three units (11 bedrooms) to the original Project does not result in new traffic impacts and the Project would not be required to provide mitigation for this level of development.

**TABLE 1
PROJECT TRIP GENERATION ESTIMATES**

TRIP GENERATION RATES [a]									
Land Use	ITE Land Use	Rate	Daily	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
Clinic	630	per employee	9.25	77%	23%	1.12	33%	64%	0.85
Off Campus Student Housing	225	per bedroom	3.15	41%	59%	0.12	50%	50%	0.25
Day Care Center	565	per student	4.09	53%	47%	0.78	47%	53%	0.79
TRIP GENERATION ESTIMATES									
Land Use	ITE Land Use	Size	Daily	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
<u>Existing to be Removed</u>									
Clinic	630	20 Employees	185	17	5	22	6	11	17
Transit/Walk-In Adjustment - 10% [b]			-19	-2	0	-2	-1	-1	-2
Day Care Center	565	30 Students	123	12	11	23	11	13	24
Transit/Walk-In Adjustment - 10% [b]			-12	-1	-1	-2	-1	-1	-2
			277	26	15	41	15	22	37
<u>Proposed Project</u>									
Off Campus Student Housing	225	506 Bedrooms	1,594	25	36	61	64	63	127
Transit/Walk-In Adjustment - 10% [b]			-169	-3	-4	-6	-6	-6	-13
Total Proposed Project Trips			1,435	22	32	55	58	57	114
TOTAL - NET NEW PROJECT TRIPS			1,158	(4)	17	14	43	35	77

[a] Source: *Trip Generation, 10th Edition*, Institute of Transportation Engineers, 2017

[b] Per LADOT's *Transportation Impact Study Guidelines* (December 2015), the Project Site is located within 0.25 miles walking distance from a transit station or RapidBus stop, a conservative transit reduction is applied to account for transit usage and walking visitor arrivals from the surrounding neighborhoods and adjacent commercial developments.

TABLE 2
FUTURE WITH PROJECT CONDITIONS (YEAR 2021)
SIGNALIZED INTERSECTION LEVELS OF SERVICE AND SIGNIFICANT IMPACTS

No.	Intersection	Peak Hour	Future without Project Conditions		Future with Project Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue & Adams Boulevard	A.M.	0.973	E	0.974	E	0.001	NO
		P.M.	1.000	E	1.001	F	0.001	NO
2.	Hoover Street & 23rd Street	A.M.	0.708	C	0.707	C	0.001	NO
		P.M.	0.673	B	0.676	B	0.003	NO
3.	Hoover Street & Adams Boulevard	A.M.	0.873	D	0.873	D	0.000	NO
		P.M.	0.891	D	0.899	D	0.008	NO
4.	Hoover Street & 30th Street	A.M.	0.400	A	0.402	A	0.002	NO
		P.M.	0.567	A	0.576	A	0.009	NO
5.	Figueroa Street & Adams Boulevard	A.M.	1.029	F	1.030	F	0.001	NO
		P.M.	1.056	F	1.063	F	0.007	NO
6.	Grand Avenue & Adams Boulevard	A.M.	0.722	C	0.722	C	0.000	NO
		P.M.	0.872	D	0.873	D	0.001	NO

Attachment
Level of Service Worksheets

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Yermont Avenue	Year of Count:	2018	Ambient Growth (%):	1	Conducted by:	GTC	Date:	June 2018									
1	East-West Street:	Adams Boulevard	Projection Year:	2021	Peak Hour:	AM	Reviewed by:		Project:	806 W Adams									
No. of Phases		4			4			4											
Opposed S/Wing: N/S-1, E/W-2 or Both-2?		0			0			0											
Right Turns: PRFF-1, M/TOR-2 or OLA-3?		NB-- 5 SB-- 0 EB-- 0 WB-- 0	NB-- 3 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0										
ATSAC-1 or ATSAC+ATCS-2?		0			0			0											
Override Capacity		0			0			0											
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	77	1	77	0	77	77	30	112	1	112	0	112	1	112	0	112	1	112
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	567	2	494	0	567	494	92	1109	2	555	0	1109	2	555	0	1109	2	555
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	200	1	54	0	200	54	57	263	1	85	0	263	1	84	0	263	1	84
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SOUTHBOUND	Left	125	1	125	0	125	125	50	179	1	179	0	179	1	179	0	179	1	179
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	870	1	473	0	870	473	181	1077	1	576	0	1077	1	576	0	1077	1	576
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	75	0	75	0	75	75	7	79	0	79	0	79	0	79	0	79	0	79
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EASTBOUND	Left	192	1	192	0	192	192	4	202	1	202	0	202	1	202	0	202	1	202
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	868	1	463	0	868	463	108	1002	1	544	0	1002	1	544	0	1002	1	544
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	57	0	57	0	57	57	37	86	0	86	0	86	0	86	0	86	0	86
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WESTBOUND	Left	146	1	146	1	147	147	48	188	1	190	1	189	1	199	0	189	1	199
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	582	1	381	0	682	381	126	829	1	487	0	829	1	486	0	829	1	486
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	38	0	38	1	100	100	43	145	0	145	1	145	0	146	0	146	0	146
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CRITICAL VOLUMES		North-South: 619 East-West: 809 SUM: 1228	North-South: 619 East-West: 810 SUM: 1229	North-South: 734 East-West: 742 SUM: 1476	North-South: 734 East-West: 745 SUM: 1477	North-South: 734 East-West: 743 SUM: 1477													
VOLUME/CAPACITY (V/C) RATIO:		0.893	0.894	1.072	1.074	1.074													
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.759	0.760	0.971	0.974	0.974													
LEVEL OF SERVICE (LOS):		C	C	E	E	E													

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.001 V/c after mitigation: 0.001
Significant Impacted? NO Fully mitigated? NO

7/12/18 8:34 AM

AR 000049

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Yermont Avenue	Year of Count:	2018	Ambient Growth (%):	1	Conducted by:	GTC	Date:	June 2018									
1	East-West Street:	Adams Boulevard	Projection Year:	2021	Peak Hour:	PM	Reviewed by:		Project:	808 W Adams									
No. of Phases		4			4			4											
Opposed Split: N/S-1, E/W-2 or Both-3?		0			0			0											
Right Turns: PRFF-1, M/TOR-2 or OLA-3?		NB-- 5 SB-- 0 EB-- 0 WB-- 0	NB-- 3 SB-- 0 EB-- 0 WB-- 0		NB-- 3 SB-- 0 EB-- 0 WB-- 0	NB-- 3 SB-- 0 EB-- 0 WB-- 0		NB-- 3 SB-- 0 EB-- 0 WB-- 0	NB-- 3 SB-- 0 EB-- 0 WB-- 0										
ATSAC-1 or ATSAC+ATCS-2?		0			0			0											
Override Capacity		0			0			0											
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	85	1	85	0	85	85	39	127	1	127	0	127	1	127	0	127	1	127
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	545	2	472	0	543	472	111	1083	2	542	0	1083	2	542	0	1083	2	542
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	169	1	35	2	171	58	15	189	1	133	2	191	1	34	0	191	1	34
SOUTHBOUND	Left	171	1	171	2	173	173	7	183	1	183	0	183	1	183	0	183	1	183
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	541	1	504	0	541	504	215	1285	1	878	0	1285	1	878	0	1285	1	878
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	167	0	87	0	87	87	0	70	0	70	0	70	0	70	0	70	0	70
EASTBOUND	Left	134	1	134	0	134	134	1	139	1	139	0	139	1	139	0	139	1	139
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	545	1	462	1	546	462	103	974	1	661	1	975	1	662	0	975	1	662
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	128	0	128	0	128	128	0	128	0	128	0	128	0	128	0	128	0	128
WESTBOUND	Left	134	1	134	1	135	135	18	155	1	155	1	157	1	157	0	157	1	157
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	713	1	487	1	714	488	32	817	1	498	1	819	1	497	0	819	1	497
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	160	0	160	1	161	161	0	174	0	174	1	175	0	175	0	175	0	175
CRITICAL VOLUMES		North-South: 643 East-West: 588 SUM: 1239	North-South: 645 East-West: 588 SUM: 1248	North-South: 805 East-West: 787 SUM: 1512	North-South: 805 East-West: 787 SUM: 1514	North-South: 805 East-West: 787 SUM: 1514													
VOLUME/CAPACITY (V/C) RATIO:		0.901	0.904	1.000	1.001	1.100													
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.901	0.904	1.000	1.001	1.100													
LEVEL OF SERVICE (LOS):		E	E	E	E	F													

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.001 V/c after mitigation: 0.001
Significant Impacted? NO Fully mitigated? NO

7/10/18 6:25 AM

PM: 11/11

CF-19-1603 - - 0203

AR 000050

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Hoover Street	Year of Count:	2018	Ambient Growth: (%)	1	Conducted by:	GTC	Date:	June 2018							
2	East-West Street:	23rd Street	Projection Year:	2021	Peak Hour:	AM	Reviewed by:		Project:	808 W Adams							
No. of Phases: 2 Opposed S/W: N/S-1, E/W-2 or Both-2? Right Turns: PRFF-1, M/TOR-2 or OLA-3? ATSC-1 or ATSC-ATCS-2? Override Capacity:			NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0								
MOVEMENT			EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT			FUTURE CONDITION W/ PROJECT			FUTURE W/ PROJECT W/ MITIGATION		
			Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	
NORTHBOUND	Left	43	1	42	0	42	42	0	43	1	43	0	43	1	43	0	43
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	1144	2	572	3	1147	574	152	1301	2	666	3	1334	2	667	0	1334
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	11	1	11	0	11	11	0	11	1	11	0	11	1	11	0	11
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	102	1	102	0	102	102	0	105	1	105	0	105	1	105	0	105
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	775	1	374	-1	774	374	126	675	1	449	-1	874	1	449	0	874
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
EASTBOUND	Right	25	0	25	0	25	25	0	24	0	24	0	24	0	24	0	24
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	122	0	122	0	122	122	0	126	0	126	0	126	0	126	0	126
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	78	0	325	0	78	325	0	81	0	232	0	81	0	232	0	232
WESTBOUND	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	24	0	0	0	24	0	0	25	0	0	0	25	0	0	0	0
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	36	0	36	0	36	36	0	37	0	37	0	37	0	37	0	37
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
CRITICAL VOLUMES	North-South:	674	North-South:	376	North-South:	771	North-South:	772	North-South:	772							
	East-West:	425	East-West:	425	East-West:	438	East-West:	438	East-West:	438							
	SUM:	1099	SUM:	1101	SUM:	1209	SUM:	1210	SUM:	1210							
	VOLUME/CAPACITY (V/C) RATIO:	0.733	0.734	0.806	0.807	0.807											
	V/C LESS ATSC/ATCS ADJUSTMENT:	0.733	0.734	0.706	0.707	0.707											
LEVEL OF SERVICE (LOS):			B	B	C	C	C	C	C	C							

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.001 V/c after mitigation: 0.001
 Significant Impacted? NO Fully Mitigated? NO

7/10/18 8:34 AM

2

Page 1 of 1

CF-19-1603 - - 0204

AR 000051

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Hoover Street	Year of Count:	2018	Ambient Growth: (%)	1	Conducted by:	GTC	Date:	June 2018										
2	East-West Street:	23rd Street	Projection Year:	2021	Peak Hour:	PM	Reviewed by:		Project:	808 W Adams										
No. of Phases: Opposed S/Wing: N/S-1, E/W-2 or Both-3?			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0											
Right Turns: PRFF-1, M/TOR-2 or OLA-3?			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0											
ATSAC-1 or ATSAC+ATCS-2?			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0											
Override Capacity:			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0											
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION WITH PROJECT				FUTURE W/ PROJECT W/ MITIGATION				
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	
NORTHBOUND	Left	34	1	34	0	34	34	0	35	1	35	0	35	1	35	0	35	1	35	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	1157	2	579	7	1164	602	74	1269	2	633	7	1273	2	637	0	1273	2	637	
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	11	1	11	0	11	11	0	11	1	11	0	11	1	11	0	11	1	11	
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	125	1	125	0	125	125	0	127	1	127	0	127	1	127	0	127	1	127	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	974	1	977	9	983	981	99	1041	1	985	9	1050	1	940	0	1050	1	940	
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
EASTBOUND	Right	34	0	34	0	34	34	0	35	0	35	0	35	0	35	0	35	0	35	
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	93	0	93	0	93	93	0	95	0	95	0	95	0	95	0	95	0	95	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	138	0	138	0	138	138	0	142	0	142	0	142	0	142	0	142	0	142	
WESTBOUND	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	34	0	34	0	34	34	0	35	0	35	0	35	0	35	0	35	0	35	
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	31	0	31	0	31	31	0	32	0	32	0	32	0	32	0	32	0	32	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
CRITICAL VOLUMES	North-South:	702	North-South:		705	North-South:		706	North-South:		754	North-South:		754	North-South:		754	North-South:		754
	East-West:	388	East-West:		388	East-West:		400	East-West:		400	East-West:		400	East-West:		400	East-West:		400
	SUM:	1090	SUM:		1093	SUM:		1106	SUM:		1154	SUM:		1154	SUM:		1154	SUM:		1154
	VOLUME/CAPACITY (V/C) RATIO:	0.727	0.729		0.772		0.776		0.776		0.776		0.776		0.776		0.776		0.776	
	V/C LESS ATSC/ATCS ADJUSTMENT:	0.637	0.629		0.671		0.675		0.675		0.675		0.675		0.675		0.675		0.675	
LEVEL OF SERVICE (LOS):		B	B		B		B		B		B		B		B		B		B	

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.003 V/c after mitigation: 0.001
 Significant Impacted? NO Fully mitigated? YES

7/10/18 6:25 AM

2

PM: sm

CF-19-1603 - - 0205

AR 000052

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Hoover Street	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	GTC	Date:	June 2018									
3	East-West Street:	Adams Boulevard	Projection Year:	2021	Peak Hour:	AM	Reviewed by:		Project:	806 W Adams									
No. of Phases		4	4		4	4		4	4										
Opposed W/T: N/S-1, E/W-2 or Both-2?		0	0		0	0		0	0										
Right Turns: PRFF-1, M/TOR-2 or OLA-1?		0	0		0	0		0	0										
ATSAC-1 or ATSAC+ATCS-2?		0	0		0	0		0	0										
Override Capacity		0	0		0	0		0	0										
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	110	1	110	0	110	110	12	125	1	125	0	125	1	125	0	125	1	125
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	740	2	370	0	740	370	58	820	2	410	0	820	2	410	0	820	2	410
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	58	1	58	0	58	29	0	60	1	30	0	58	1	30	0	58	1	30
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	158	1	158	0	158	158	27	200	1	200	0	158	1	158	0	158	1	158
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	758	2	379	0	758	379	35	814	2	307	0	814	2	307	0	814	2	307
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
EASTBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	287	1	287	0	287	287	51	357	1	357	0	357	1	357	0	357	1	357
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	758	2	379	0	758	379	78	860	2	430	0	860	2	430	0	860	2	430
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
WESTBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	48	1	48	0	48	48	0	48	1	48	0	48	1	48	0	48	1	48
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	908	2	302	0	908	302	120	741	2	371	0	741	2	371	0	741	2	371
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
CRITICAL VOLUMES		North-South: 538 East-West: 589 SUM: 1127	North-South: 587 East-West: 590 SUM: 1127	North-South: 610 East-West: 728 SUM: 1338	North-South: 606 East-West: 729 SUM: 1336	North-South: 609 East-West: 729 SUM: 1338													
VOLUME/CAPACITY (V/C) RATIO:		0.820	0.820	0.820	0.820	0.820													
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.730	0.730	0.730	0.730	0.730													
LEVEL OF SERVICE (LOS):		C	C	C	C	C													

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.000 V/c after mitigation: 0.000
Significant Impacted? NO Fully mitigated? NO

7/10/18 6:24 AM

2/1/19

CF-19-1603 - - 0206

AR 000053

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Hoover Street	Year of Count:	2018	Ambient Growth (%):	1	Conducted by:	ETC	Date:	June 2018									
3	East-West Street:	Adams Boulevard	Projection Year:	2021	Peak Hour:	PM	Reviewed by:		Project:	808 W Adams									
No. of Phases			4	4	4	4	4	4	4	4									
Opposed W/T: N/S-1, E/W-2 or Both-2?			0	0	0	0	0	0	0	0									
Right Turns: PRFF-1, M/TOR-2 or OLA-1?			0	0	0	0	0	0	0	0									
ATSAC-1 or ATSAC+ATCS-2?			0	0	0	0	0	0	0	0									
Override Capacity			0	0	0	0	0	0	0	0									
MOVEMENT			EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT			FUTURE CONDITION W/ PROJECT			FUTURE W/ PROJECT W/ MITIGATION				
			Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes
NORTHBOUND	Left	183	1	183	0	183	183	0	181	1	181	0	181	1	181	0	181	1	181
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	975	2	488	0	975	488	31	975	2	488	0	975	2	488	0	975	2	488
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	49	1	9	17	86	9	0	50	1	9	17	67	1	19	0	67	1	19
SOUTHBOUND	Left	159	1	159	0	159	159	0	151	1	151	0	151	1	151	0	151	1	151
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	788	2	398	0	788	398	41	651	2	426	0	651	2	426	0	651	2	426
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	145	1	14	0	145	14	0	170	1	25	0	170	1	25	0	170	1	25
EASTBOUND	Left	263	1	263	0	263	263	19	290	1	290	0	290	1	290	0	290	1	290
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	628	2	312	4	628	314	102	745	2	373	4	748	2	375	0	748	2	375
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	227	1	136	0	227	136	0	236	1	141	0	236	1	141	0	236	1	141
WESTBOUND	Left	81	1	81	14	95	95	0	83	1	82	14	97	1	97	0	97	1	97
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	696	2	348	4	696	348	74	787	2	394	4	791	2	396	0	791	2	396
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	343	1	177	7	343	175	24	370	1	179	7	377	1	177	0	377	1	177
CRITICAL VOLUMES			North-South: 617 East-West: 809 SUM: 1228	North-South: 326 East-West: 811 SUM: 1237	North-South: 678 East-West: 884 SUM: 1363	North-South: 636 East-West: 886 SUM: 1374	North-South: 636 East-West: 886 SUM: 1374	North-South: 636 East-West: 886 SUM: 1374	North-South: 636 East-West: 886 SUM: 1374	North-South: 636 East-West: 886 SUM: 1374									
VOLUME/CAPACITY (V/C) RATIO:			0.892	0.900	0.991	0.999	0.991	0.999	0.991	0.999	0.991	0.999	0.991	0.999	0.991	0.999	0.991	0.999	0.991
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.798	0.800	0.891	0.899	0.891	0.899	0.891	0.899	0.891	0.899	0.891	0.899	0.891	0.899	0.891	0.899	0.891
LEVEL OF SERVICE (LOS):			C	C	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.008 Aw/c after mitigation: 0.000
Significant Impacted? NO Fully mitigated? YES

7/10/18 6:25 AM

18

PM: sm

CF-19-1603 - - 0207

AR 000054

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Hoover Street	Year of Count:	2018	Ambient Growth (%):	1	Conducted by:	GTC	Date:	June 2018									
4	East-West Street:	30th Street	Projection Year:	2021	Peak Hour:	AM	Reviewed by:		Project:	806 W Adams									
No. of Phases			3	3	3	3	3	3	3	3									
Opposed S/W: N/S-1, E/W-2 or Both-2?			0	0	0	0	0	0	0	0									
Right Turns: PRFF-1, M/TOR-2 or OLA-3?			NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0									
			EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0									
ATSAC-1 or ATSAC+ATCS-2?			0	0	0	0	0	0	0	0									
Override Capacity			0	0	0	0	0	0	0	0									
MOVEMENT			EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT			FUTURE CONDITION W/ PROJECT			FUTURE W/ PROJECT W/ MITIGATION				
			Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes
NORTHBOUND	Left	35	1	35	0	35	35	0	35	1	35	0	35	1	35	0	35	1	35
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	272	2	236	1	471	235	45	531	2	266	1	530	2	265	0	530	2	265
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	48	1	30	0	43	30	3	47	1	32	0	47	1	32	0	47	1	32
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	58	1	58	0	58	58	10	80	1	80	0	80	1	80	0	80	1	80
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	293	1	322	0	496	325	31	538	1	356	3	542	1	358	0	542	1	358
EASTBOUND	Through-Right	150	0	150	0	153	153	15	171	0	171	0	174	0	174	0	174	0	174
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	178	1	178	0	177	177	21	204	1	204	1	203	1	203	0	233	1	203
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WESTBOUND	Through	71	0	105	0	71	105	0	73	0	105	0	73	0	105	0	73	0	105
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	34	0	0	0	34	0	0	35	0	0	0	35	0	0	0	35	0	0
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CRITICAL VOLUMES			North-South: 357 East-West: 284 SUM: 641	North-South: 360 East-West: 283 SUM: 643	North-South: 381 East-West: 322 SUM: 713	North-South: 394 East-West: 321 SUM: 715	North-South: 394 East-West: 321 SUM: 715	North-South: 394 East-West: 321 SUM: 715											
VOLUME/CAPACITY (V/C) RATIO:			0.450	0.381	0.500	0.502	0.502	0.502											
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.361	0.291	0.401	0.402	0.402	0.402											
LEVEL OF SERVICE (LOS):			A	A	B	A	A	A											

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.002 V/C after mitigation: 0.002
 Significant Impacted? NO Fully mitigated? YES

7/12/18 6:24 AM

4

AR 000055

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Hoover Street	Year of Count:	2018	Ambient Growth (%):	1	Conducted by:	GTC	Date:	June 2018										
4	East-West Street:	30th Street	Projection Year:	2021	Peak Hour:	PM	Reviewed by:		Project:	806 W Adams										
No. of Phases: 3 Opposed S/W: N/S-1, E/W-2 or Both-2? Right Turns: FRTF-1, MTR-2 or OLA-3? ATSC-1 or ATSC-ATCS-2? Override Capacity:			NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0											
MOVEMENT			EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT			FUTURE CONDITION WITH PROJECT			FUTURE W/ PROJECT W/ MITIGATION					
			Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	71	1	71	0	71	71	0	73	1	73	0	73	1	73	0	73	1	73	
	Left-Through		0							0				0				0		
	Through	356	2	329	9	338	338	15	354	2	347	9	353	2	352	0	353	2	352	
	Through-Right		0							0				0				0		
	Right	26	1	10	0	26	0	0	31	1	13	0	31	1	13	0	31	1	13	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
SOUTHBOUND	Left	232	1	232	0	232	232	11	250	1	250	0	250	1	250	0	250	1	250	
	Left-Through		0							0				0				0		
	Through	378	1	435	7	442	442	25	467	1	468	7	475	1	476	0	475	1	475	
	Through-Right		0							0				0				0		
	Right	194	0	194	7	201	201	17	217	0	217	7	224	0	224	0	224	0	224	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
EASTBOUND	Left	192	1	192	9	201	201	14	212	1	212	9	221	1	221	0	221	1	221	
	Left-Through		0							0				0				0		
	Through	98	0	138	0	98	138	0	102	0	143	0	102	0	143	0	132	0	143	
	Through-Right		0							0				0				0		
	Right	40	0	0	0	40	0	0	41	0	0	0	41	0	0	0	41	0	0	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
WESTBOUND	Left	32	1	32	0	32	32	3	35	1	35	0	35	1	35	0	35	1	35	
	Left-Through		0							0				0				0		
	Through	146	1	132	0	146	132	0	150	1	141	0	150	1	141	0	150	1	141	
	Through-Right		0							0				0				0		
	Right	118	0	118	0	118	118	0	131	0	131	0	131	0	131	0	131	0	131	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
CRITICAL VOLUMES			North-South: 560		560	North-South: 565		565	North-South: 587		587	North-South: 602		602	North-South: 602		602	North-South: 602		602
			East-West: 324		324	East-West: 333		333	East-West: 353		353	East-West: 352		352	East-West: 352		352	East-West: 352		352
			SUM: 884		884	SUM: 898		898	SUM: 940		940	SUM: 954		954	SUM: 954		954	SUM: 954		954
VOLUME/CAPACITY (V/C) RATIO:			0.620		0.530			0.667		0.676		0.676		0.676		0.676		0.676		0.676
V/C LESS ATSC/ATCS ADJUSTMENT:			0.620		0.530			0.667		0.676		0.676		0.676		0.676		0.676		0.676
LEVEL OF SERVICE (LOS):			B		A			B		A		A		A		A		A		A

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.009 V/c after mitigation: 0.009
 Significant Impacted? NO Fully mitigated? NO

7/10/18 6:25 AM

4

PM:uri

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Figueroa Street	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	GTC	Date:	June 2018										
5	East-West Street:	Adams Boulevard	Projection Year:	2021	Peak Hour:	AM	Reviewed by:		Project:	808 W Adams										
No. of Phases			4	4	4	4	4	4	4	4										
Opposed S/Wing: N/S-1, E/W-2 or Both-2?			0	0	0	0	0	0	0	0										
Right Turns: PRFF-1, NRTOR-2 or OLA-3?			NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0										
ATSAC-1 or ATSAC+ATCS-2?			EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0										
Override Capacity			0	0	0	0	0	0	0	0										
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION				
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	
NORTHBOUND	Left	143	1	143	0	143	143	7	150	1	150	0	150	1	150	0	150	1	150	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	1187	2	594	0	1187	594	204	1457	2	729	0	1457	2	729	0	1457	2	729	
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	48	1	0	0	48	0	36	107	1	0	0	107	1	0	0	107	1	0	
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	188	1	188	0	188	188	29	223	1	223	0	223	1	223	0	223	1	223	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	780	1	488	0	780	488	125	1177	1	897	0	1177	1	897	0	1177	1	897	
EASTBOUND	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	139	1	139	2	141	141	6	149	1	149	2	151	1	151	0	151	1	151	
WESTBOUND	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	551	1	309	2	553	311	75	643	1	358	2	645	1	360	0	645	1	360	
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	68	0	68	2	88	68	6	73	0	73	2	75	0	75	0	75	0	75	
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
CRITICAL VOLUMES	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	114	1	114	0	114	114	121	238	1	238	0	238	1	238	0	238	1	238	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	754	2	377	0	754	377	125	902	2	451	0	902	2	451	0	902	2	451	
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
VOLUME/CAPACITY (V/C) RATIO:	Right	283	1	95	0	283	95	54	355	1	133	0	355	1	133	0	355	1	133	
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	North-South:	782	North-South:	782	North-South:	952	North-South:	952	North-South:	952	North-South:	952								
	East-West:	518	East-West:	518	East-West:	800	East-West:	800	East-West:	800	East-West:	800								
SUM:		1298	SUM:		1300	SUM:		1552	SUM:		1554	SUM:		1554	SUM:		1554	SUM:		1554
VOLUME/CAPACITY (V/C) RATIO:		0.944	0.945		1.128		1.130		1.130		1.130		1.130		1.130		1.130		1.130	
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.944	0.945		1.128		1.130		1.130		1.130		1.130		1.130		1.130		1.130	
LEVEL OF SERVICE (LOS):		E	E		F		F		F		F		F		F		F		F	

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.001 V/c after mitigation: 0.001
Significant Impacted? NO Fully mitigated? NO

7/12/18 6:24 AM

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CF-19-1603 - - 0210

AR 000057

Communication from Public

Name: Andrew Brady

Date Submitted: 03/31/2022 03:11 PM

Council File No: 19-1603-S1

Comments for Public Posting: Please see the attached letter from the Applicant's representative, Andrew Brady of DLA Piper. Part 3 of 4 documents attached.

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Figueroa Street	Year of Count:	2018	Ambient Growth: (%)	1	Conducted by:	GTC	Date:	June 2018					
5	East-West Street:	Adams Boulevard	Projection Year:	2021	Peak Hour:	PM	Reviewed by:		Project:	808 W Adams					
No. of Phases			4	4	4	4	4	4	4	4					
Opposed S/Wing: N/S-1, E/W-2 or Both-2?			0	0	0	0	0	0	0	0					
Right Turns: PRFF-1, M/TOR-2 or OLA-3?			NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0	NB-- 0 SB-- 0					
ATSAC-1 or ATSAC+ATCS-2?			EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0	EB-- 0 WB-- 0					
Override Capacity			0	0	0	0	0	0	0	0					
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	229	1	229	4	233	233	4	240	1	240	4	244	1	244
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	581	2	491	0	581	491	437	1413	2	705	0	1413	2	705
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	47	1	9	0	47	9	116	164	1	87	0	164	1	87
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	159	1	159	0	159	159	77	241	1	241	0	241	1	241
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	840	1	476	0	840	476	537	1402	1	781	0	1402	1	781
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EASTBOUND	Right	111	0	111	4	115	115	0	170	0	170	4	174	0	174
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	106	1	106	4	110	110	7	116	1	116	4	120	1	120
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	538	1	330	4	543	334	102	657	1	393	4	661	1	397
WESTBOUND	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	121	0	121	4	125	125	4	129	0	129	4	133	0	133
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	76	1	76	0	76	76	117	195	1	195	0	195	1	195
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CRITICAL VOLUMES		North-South: 705 East-West: 508 SUM: 1211	North-South: 711 East-West: 512 SUM: 1223	North-South: 1001 East-West: 582 SUM: 1583	North-South: 1007 East-West: 592 SUM: 1599	North-South: 1007 East-West: 592 SUM: 1599	North-South: 1007 East-West: 592 SUM: 1599	North-South: 1007 East-West: 592 SUM: 1599	North-South: 1007 East-West: 592 SUM: 1599	North-South: 1007 East-West: 592 SUM: 1599					
VOLUME/CAPACITY (V/C) RATIO:		0.881	0.969	1.156	1.163	1.163	1.163	1.163	1.163	1.163					
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.781	0.789	1.068	1.068	1.068	1.068	1.068	1.068	1.068					
LEVEL OF SERVICE (LOS):		C	C	F	F	F	F	F	F	F					

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.007 V/c after mitigation: 0.007
Significant Impacted? NO Fully mitigated? NO

7/10/18 6:25 AM

PM: sm

CF-19-1603 - - 0211

AR 000058

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Grand Avenue	Year of Count:	2018	Ambient Growth (%):	1	Conducted by:	GTC	Date:	June 2018									
5	East-West Street:	Adams Boulevard	Projection Year:	2021	Peak Hour:	AM	Reviewed by:		Project:	808 W Adams									
No. of Phases		2			2			2											
Opposed W/T: N/S-1, E/W-2 or Both-2?		0			0			0											
Right Turns: PRFF-1, M/TOR-2 or OLA-3?		NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0										
ATSAC-1 or ATSAC+ATCS-2?		0			0			0											
Override Capacity		0			0			0											
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	98	1	98	0	98	98	0	101	1	101	0	101	1	101	0	101	1	101
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	550	1	550	0	550	550	29	569	1	569	0	569	1	569	0	569	1	569
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	58	0	58	0	58	58	1	58	0	58	0	58	0	58	0	58	0	58
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	70	1	70	0	70	70	95	137	1	137	0	137	1	137	0	137	1	137
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	300	1	300	0	300	300	518	827	1	827	0	827	1	827	0	827	1	827
EASTBOUND	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	53	0	53	0	53	53	191	246	0	246	0	246	0	246	0	246	0	246
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	99	1	99	0	99	99	85	183	1	183	0	183	1	183	0	183	1	183
WESTBOUND	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	554	1	554	1	555	517	302	873	1	873	1	874	1	874	0	874	1	873
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Right	78	0	78	0	78	78	0	81	0	81	0	81	0	81	0	81	0	81
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WESTBOUND	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left	66	1	66	0	66	66	10	78	1	78	0	78	1	78	0	78	1	78
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through	581	1	581	0	581	581	72	671	1	671	0	671	1	671	0	671	1	671
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WESTBOUND	Right	96	0	96	0	96	96	43	142	0	142	0	142	0	142	0	142	0	142
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	CRITICAL VOLUMES		North-South: 372 East-West: 433 SUM: 610	North-South: 372 East-West: 438 SUM: 610		North-South: 838 East-West: 995 SUM: 1233		North-South: 836 East-West: 995 SUM: 1233		North-South: 838 East-West: 995 SUM: 1233									
	VOLUME/CAPACITY (V/C) RATIO:		0.640	0.540		0.822		0.822		0.822									
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.440	0.440		0.722		0.722		0.722										
LEVEL OF SERVICE (LOS):		B	B		C		C		C										

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.000 v/c after mitigation: 0.000
Significant Impacted? NO Fully mitigated? NO

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CF-19-1603 - - 0212

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Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Grand Avenue	Year of Count:	2018	Ambient Growth (%):	1	Conducted by:	GTC	Date:	June 2018									
5	East-West Street:	Adams Boulevard	Projection Year:	2021	Peak Hour:	PM	Reviewed by:		Project:	808 W Adams									
No. of Phases		2			2			2											
Opposed S/Wing: N/S-1, E/W-2 or Both-3?		0			0			0											
Right Turns: PRFF-1, M/TOR-2 or OLA-3?		NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0										
ATSAC-1 or ATSAC+ATCS-2?		0			0			0											
Override Capacity		0			0			0											
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	103	1	103	0	103	103	0	103	1	103	0	103	1	103	0	103	1	103
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	575	1	328	0	575	328	77	652	1	376	0	652	1	376	0	652	1	376
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	77	0	77	0	77	77	7	84	0	84	0	84	0	84	0	84	0	84
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	116	1	116	0	116	116	80	180	1	180	0	180	1	180	0	180	1	180
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through	277	1	279	0	277	280	846	1137	1	884	0	1137	1	885	0	1137	1	885
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
EASTBOUND	Right	80	0	80	0	80	80	148	230	0	230	0	230	0	230	0	230	0	230
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left	116	1	116	0	116	116	352	352	1	352	0	352	1	352	0	352	1	352
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
WESTBOUND	Through	803	1	336	0	803	336	320	841	1	505	0	841	1	506	0	841	1	506
	Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Right	66	0	66	0	66	66	0	66	0	66	0	66	0	66	0	66	0	66
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
CRITICAL VOLUMES		North-South: 442 East-West: 401 SUM: 843			North-South: 442 East-West: 402 SUM: 844			North-South: 790 East-West: 888 SUM: 1458				North-South: 791 East-West: 888 SUM: 1459				North-South: 791 East-West: 888 SUM: 1459			
VOLUME/CAPACITY (V/C) RATIO:		0.562			0.563			0.972				0.973				0.973			
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.489			0.490			0.972				0.973				0.973			
LEVEL OF SERVICE (LOS):		D			D			D				D				D			

REMARKS:

Version: 11 Beta: 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.001 V/c after mitigation: 0.001
Significant Impacted? NO Fully mitigated? YES

7/10/18 6:25 AM

PM: sm

CF-19-1603 - - 0213

AR 000060

EXHIBIT D



Memorandum

To:	City of Los Angeles Department of City Planning
From:	Heidi Mekkelson, ICF
Date:	February 18, 2022
Re:	Second Supplemental Environmental Analysis for the 806 W. Adams Boulevard Residential Project

This supplemental memorandum assesses the potential for additional potential “related projects” to result in changes to the prior cumulative impact analysis for the 806 W. Adams Boulevard Residential Project (Project) Class 32 Categorial Exemption memorandum prepared by ICF on October 5, 2018. As demonstrated herein, the additional potential related projects do not change the cumulative impact analysis conclusions presented in the Class 32 Categorial Exemption memorandum, and the Project still qualifies for a Class 32 Categorial Exemption from review under the California Environmental Quality Act (CEQA).

PROJECT DESCRIPTION

The Project would involve the construction and operation of an urban infill residential development on an approximately 2.8-acre site (Project Site) in the University Park neighborhood of the South Los Angeles Community Plan Area, less than one mile from the University of Southern California (USC) campus. The irregularly-shaped Project Site is located at the southeast corner of West Adams Boulevard and Severance Street on a block that is also bordered by Figueroa Street to the east, 28th Street to the south, and University Avenue to the southeast. The Project Site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping.

The Project would demolish the existing on-site building and parking lot and construct 102 multiple-family residential dwelling units within six, three-story buildings over a single-level podium parking structure, totaling four stories. The residential units would provide a total of 506 bedrooms. Seven of the units would be restricted affordable units for Very Low Income households (five units) and Workforce housing (two units). An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the Project would construct 185,985 square feet of new floor area at a floor area ratio (FAR) of 1.75:1. The Project would also provide a total of 259 vehicle parking spaces for off-street parking.

The Project evaluated in the 2018 Class 32 Categorical Exemption memorandum proposed 99 multiple-family residential dwelling units totaling 83,150 square feet of new floor area. ICF prepared a Supplemental Environmental Analysis on July 16, 2019 that determined that the addition of three dwelling units and 2,835 square feet of floor area within the same building configuration would not change the conclusions presented in the 2018 Class 32 Categorical Exemption memorandum. This Second Supplemental Environmental Analysis focuses on the addition of nine potential related projects, as described below. No changes have occurred to the Project since preparation of the 2019 Supplemental Environmental Analysis.

ORIGINAL CUMULATIVE ANALYSIS

The CEQA Guidelines establish exceptions to the use of Categorical Exemptions, one of which is “when the cumulative impact of successive projects of the same type in the same place, over time is significant” (CEQA Guidelines Section 15300.2(b)). As discussed in the Class 32 Categorical Exemption memorandum, the Project Site is currently developed with existing uses and located in an urbanized area surrounded by other residential uses, as well as some education and commercial uses. The cumulative analysis in the Class 32 Categorical Exemption memorandum (p. 12) concluded that the Project is consistent with the South Los Angeles Community Plan as well as zoning and the requirements of the Los Angeles Municipal Code (LAMC). The Project’s impacts on biological resources would be less than significant as the Project Site has no value as habitat and standard pre-construction surveys would ensure that special-status species are not present in the onsite trees or landscaping that would be impacted prior to construction activities. The Project’s impact on water quality would be less than significant as the project would adhere to all applicable laws and ordinances which would require LID features incorporated into the project design and stormwater BMPs to reduce potential impacts related to stormwater runoff during construction. The Project is not located on or visible from a state-defined scenic highway nor would the Project lead to a substantial adverse change in the significance of a historic resource, as determined by the Project’s Phase 1 Historical Resource Assessment Report, 806 W. Adams Blvd. (Historic Resources Group, 2018). The Limited Phase I ESA for the Project Site determined there is a low probability of encountering hazardous materials at the Project Site. The Project would be served by existing utility lines and existing public services. The Traffic Impact Study (Gibson Transportation Consulting, Inc., 2018) considered the Project’s contributions to traffic and determined them to be less than significant. The TIS also considered the Project’s potential cumulative impacts, considering the Project’s contributions to all future cumulative traffic growth (including related projects and ambient traffic growth) and determined them to be less than significant. Similarly, the Project’s Air Quality Analysis (ICF, 2018) determined that the Project construction emissions would not exceed SCAQMD’s regional mass or localized significance thresholds. Project operation emissions would not exceed SCAQMD’s regional mass or localized significance thresholds and the Project would not result in any significant air quality impacts. Therefore, the Project’s impacts as a whole would be less than significant and are not cumulatively considerable.

The immediate vicinity of the Project Site is undergoing intensification. At the time the Class 32 Categorical Exemption memorandum was prepared, there were over 70 related projects within a 1.5-mile radius of the Project Site, including at 2455 S Figueroa Street (145 apartments), 3101 S Figueroa Street (275 hotel rooms), 243 W Adams Boulevard (300 apartment units), and 505 W 31st Street (7 story student housing building). The related project closest to the Project Site is at 2716 S Severance Street (a 9,955-square foot child care center), directly south of the Project Site. Based on a review of the types and locations of the related projects, and considering the less-than-significant impacts that would result from

the Project, it was determined that the Project would not make a cumulatively considerable contribution to any significant cumulative impacts when considering it along with other related present, past, and reasonably foreseeable successive projects of the same type in the same place over time. Therefore, the Class 32 Categorical Exemption memorandum determined that the cumulative impact exception set forth in CEQA Guidelines Section 15300.2(b) is not applicable to the Project.

ADDITIONAL RELATED PROJECTS

ICF evaluated nine additional potential related projects (Potential Related Projects) to determine whether they constitute “successive projects of the same type in the same place” pursuant to CEQA Guidelines Section 15300.2(b), and if so, whether they would change the conclusions of the cumulative impact analysis presented in the Class 32 Categorical Exemption memorandum. Table 1 lists the nine Potential Related Projects that were evaluated. Figure 1 depicts their locations in relation to the Project Site.

Table 1. Additional Related Projects

Project No.	Address	Case Number	Project Type	Distance to Project Site (miles)
1	243 W. Adams Boulevard	CPC-2016-3312-GPA-VZC-DB-SPR, ENV-2016-3313-MND	296 apartment units	0.50
2	505 W. 31 st Street	CPC-2017-111-DB-SPR, ENV-2017-112-CE	73 apartment units	0.42
3	2595 S. Hoover Street	None	46 townhomes	0.23
4	2321 S. Flower Street	DIR-2020-996-SPR-HCA, ENV-2020-997-CE	280 apartment units	0.35
5	2813 S. Flower Street	DIR-2020-7585-RDP, ENV-2020-7592-EAF	47 hotel rooms	0.34
6	1069 W. Exposition Boulevard	ADM-2021-1387-CPIOC	52 apartment units	1.08
7	1265 W. Exposition Boulevard	CPC-2020-415-DB-SPR-CUW, ENV-2020-415-CE	108 apartment units	1.35
8	1421 W. Adams Boulevard	DIR-2019-2727-CCMP(-1A), ENV-2019-2728-CE, ADM-2020-5776-CPIOC	45 apartment units	0.67
9	1840 W. Adams Boulevard	VTT-83081-SL-HCA, ENV-2020-3308-CE	10 SL townhomes	1.38

Note: Related Project locations are shown in Figure 1.

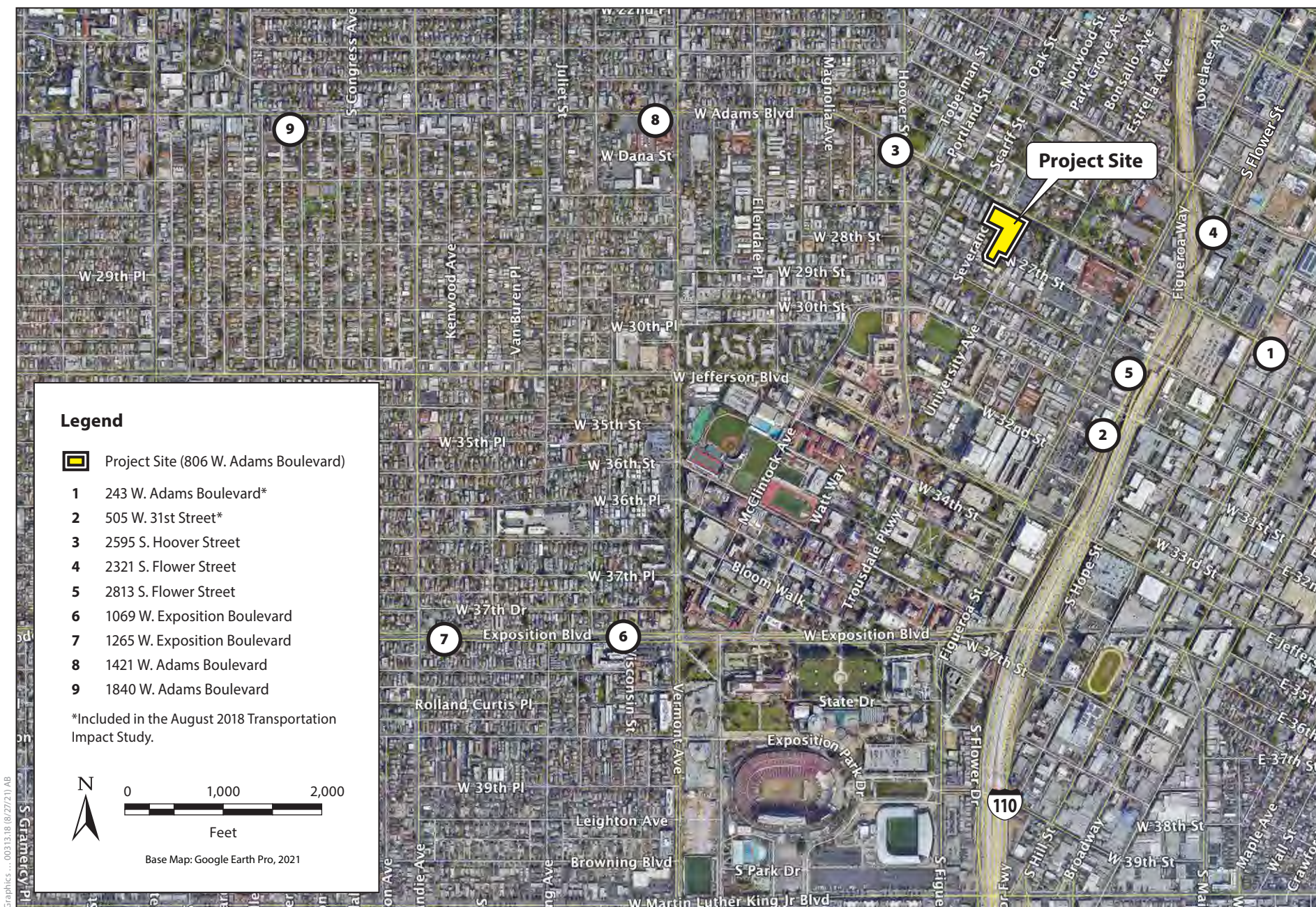


Figure 1
Potential Related Projects
September, 2021

Potential Related Projects 1 and 2 were included in the previously prepared cumulative analysis for the Project as Related Projects 9 and 67, respectively (Gibson Transportation Consulting, Inc, 2018). However, the project descriptions for both projects have been updated based on current project information.

Neither the CEQA Guidelines nor CEQA case law provide specific metrics for defining “successive projects of the same type in the same place.” ICF’s professional judgment is that “successive projects of the same type in the same place” should conservatively include proposed residential or mixed-use residential projects within no greater than one mile of the Project Site. Potential Related Projects 1, 2, 3, 4, and 8 meet this definition. Potential Related Projects 5, 6, 7, and 9 do not meet this definition, either because they are not residential projects (Potential Related Project 5) or because they are located over one mile from the Project Site (Potential Related Projects 6, 7, and 9). Notwithstanding the conclusion that some of the Potential Related Projects should not qualify as “related projects” under CEQA Guidelines Section 15300.2(b), to provide the most conservative analysis, all of the Potential Related Projects identified in Table 1 are evaluated in this analysis.

REVISED CUMULATIVE ANALYSIS

The revised cumulative analysis with the incorporation of the Potential Related Projects is provided below. For each topic, a brief summary of the previous cumulative analysis is provided, followed by the revised cumulative analysis.

Land Use

The Class 32 Categorical Exemption memorandum concluded that the Project is consistent with the applicable general plan designation and policies as well as the zoning designations and regulations, and would not contribute to a significant cumulative land use impact.

Revised Cumulative Analysis

The Potential Related Projects include eight residential projects and one hotel project. The Potential Related Projects are generally similar to the Project in terms of scale, with the exception of Potential Related Project 9, which is a 10-lot small lot subdivision project. Each project would be subject to review by the City for consistency with applicable general plan and zoning standards. The addition of the potential related projects to the Project’s cumulative analysis would not alter the Project’s consistency with the applicable general plan designation and all applicable general plan policies, as well as applicable zoning designations and regulations. The Project would continue to be consistent with the applicable general plan designation and policies and zoning designations as previously determined and would not contribute to a significant cumulative land use impact. Therefore, in conjunction with the Potential Related Projects, the Project would not cause a cumulatively considerable contribution to any significant cumulative impacts on land use.

Biological Resources

The Class 32 Categorical Exemption memorandum concluded that the Project Site has no value as habitat for endangered, rare, or threatened species due to the location in an urbanized area and that there were no special-status plant species observed within a two-mile radius of the Project Site (California Natural Diversity Database, 2018). Therefore, the Project would not contribute to a significant cumulative impact on endangered, rare, or threatened species.

Revised Cumulative Analysis

The additional potential related projects would not change the characteristics of the Project Site, or its lack of value as habitat for endangered, rare, or threatened species. Like the Project, the potential related projects would be required to conduct pre-construction surveys of all potential nesting habitat in the area of construction disturbance in accordance with the City's standard conditions of approval and in compliance with applicable regulatory standards. Therefore, even in conjunction with the potential related projects, the Project would not cause a cumulatively considerable contribution to any significant cumulative impacts on biological resources.

Traffic

The Class 32 Categorical Exemption memorandum, August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson Transportation Consulting, Inc, 2018), and July 2019 *Supplemental Analysis for the 806 W. Adams Boulevard* (Gibson Transportation Consulting, Inc, 2019) concluded that the Project would not result in a significant impact at any of the six intersections within the study area. The studies also concluded that the Project would not have a significant impact on the regional freeway, arterial, or regional transit system. Therefore, the Class 32 Categorical Exemption memorandum and the 2019 Supplemental Environmental Analysis determined that the Project would not contribute to a significant cumulative traffic impact.

Revised Cumulative Analysis

On July 30, 2019, the City adopted the City of Los Angeles CEQA Transportation Thresholds. The thresholds include using vehicle miles travelled (VMT) as a criterion to determine transportation impacts pursuant to Senate Bill (SB) 743 and changes to CEQA Guidelines Section 15064.3, which establish that vehicle delay, or level of service (LOS), is no longer considered a significant impact on the environment. The Class 32 Categorical Exemption memorandum, August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson Transportation Consulting, Inc, 2018), and July 2019 *Supplemental Analysis for the 806 W. Adams Boulevard* (Gibson Transportation Consulting, Inc, 2019), all of which predate the adoption of the City's CEQA Transportation Thresholds, included an LOS-based analysis of the Project's traffic impacts. In accordance with current State and local requirements for evaluating transportation impacts under CEQA, a VMT-based cumulative impact analysis is provided below. An updated LOS-based cumulative impact analysis is also provided for informational purposes, but not as a basis for determining the significance of the Project's potential cumulative impacts under CEQA.

Cumulative VMT Analysis

As provided in the September 2021 *806 W. Adams Supplemental Traffic Analysis*, which is included in Attachment A, the daily vehicle trips and daily VMT expected to be generated by the Project were forecast using the City's VMT Calculator tool (Gibson Transportation Consulting, Inc., 2021). Copies of the City of Los Angeles VMT Calculator worksheets for the Project are included in Attachment A. As indicated therein:

- The Project is estimated to generate a total of 2,475 daily vehicle trips.
- The Project is estimated to generate a total of 14,921 daily VMT.
- The Project is estimated to generate 5.6 household VMT per capita,¹ which is less than the South Los Angeles significance threshold of 6.0 household VMT per capita.

Therefore, the Project's VMT impacts would be less than significant, and no mitigation measures are required. Each related project would be required to analyze their respective project's impacts relating to

¹ Based on home-based production trips only.

VMT. Each related project would be required to implement mitigation measures should their project exceed the VMT threshold. Long-term, or cumulative, effects are determined through a consistency check with the Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS). The 2020-2045 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) emissions reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG emissions goals. Projects that are deemed to be consistent have a less than significant cumulative impact on VMT under the City's VMT methodology, as noted in the City's Transportation Assessment Guidelines (TAG) (LADOT 2020). Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City's TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact (LADOT 2020). Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS (LADOT 2020). The Project thus falls under the City's efficiency-based impact thresholds and would align with SCAG's RTP/SCS for long-term VMT and GHG reduction goals. Therefore, the Project would not contribute to a cumulative VMT impact related to daily vehicle trips. Therefore, the Project's impacts related to VMT would not be cumulatively considerable, and cumulative transportation impacts from the Project in conjunction with the Potential Related Projects would be less than significant.

Cumulative LOS Analysis (For Informational Purposes)

The Project transportation consultant analyzed the potential for traffic-related effects resulting from the additional related projects (Gibson Transportation Consulting, Inc., 2021). The results of the analysis are included in Attachment A. The analysis shows that the additional related projects would generate 6,901 net new daily vehicle trips, including 438 A.M. peak hour trips and 533 P.M. peak hour trips. The supplemental analysis evaluated the effect of these trips within the Project study area, which includes six study intersections under Future With Project (i.e., Cumulative) Conditions. Under Future with Project Conditions, the supplemental analysis determined that incremental traffic increases resulting from the potential related projects would not change the future LOS at any study intersection compared to Future Without Project Conditions. Therefore, the results of the August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson Transportation Consulting, Inc, 2018) and July 2019 *Supplemental Analysis for the 806 W. Adams Boulevard* (Gibson Transportation Consulting, Inc, 2019) would not change with the additional related projects.

Noise

The Class 32 Categorical Exemption, August 2018 *Environmental Noise Study for the 806 W Adams Residential Project* (ICF, 2018), and 2019 Supplemental Environmental Analysis concluded that the Project would comply with applicable LAMC noise regulations with proposed noise control methods incorporated into the construction process and Project design and operations. Project construction activities would occur within the permitted hours established in LAMC Section 41.40, and noise levels generated from construction equipment would not exceed the maximum noise level at noise-sensitive receptors located off-site after implementation of noise control methods in accordance with LAMC Section 112.05. During operations, the incorporation of noise control methods by the Project would ensure that all noise-generating mechanical equipment would comply with the requirements of LAMC Section 112.02, and that noise from the Project's outdoor residential amenity spaces would comply with noise limits set forth in the LAMC. Additionally, groundborne vibration generated from the operation of heavy

construction equipment at the Project Site would not reach levels that would result in building damage or human annoyance at off-site structures under widely-used standards produced by Caltrans. Furthermore, as a residential development the Project would not have any major sources of vibration during daily operations. Therefore, the Project was determined to not result in any significant contribution to cumulative noise or groundborne vibration impacts.

Revised Cumulative Analysis

The closest Potential Related Project (Related Project 3) is 0.23 miles from the Project site; the remaining additional Potential Related Projects are located at greater distances. All the Potential Related Projects are separated from the Project site by numerous buildings that would act as intervening noise barriers within an urban environment many different sources of existing ambient noise. These factors (distance and acoustical shielding from buildings and ambient noise) would substantially reduce any construction or operational noise or groundborne vibration propagating from the Potential Related Projects in conjunction with the Project, such that the resulting noise and vibration levels at the Project site and surrounding properties would be negligible. As indicated, there would be no change in Project-generated construction and operational noise levels than those previously analyzed and, as a result of the non-contribution of construction noise from Potential Related Projects in the affected area around the Project site, on-site Project activities would not result in any significant contribution to cumulative noise or groundborne vibration impacts.

Regarding operational cumulative noise impacts, the Potential Related Projects would result in changes to future traffic conditions in the Project vicinity and thus create the potential for cumulative off-site noise impacts operating in conjunction with the Project. To assess these impacts, future traffic noise levels were reevaluated based on the updated cumulative traffic volumes that included the Potential Related Projects (Gibson Transportation Consulting, Inc., 2021). The updated cumulative traffic noise analysis results are summarized in Table 2. Comparing the results to those in the 2018 Environmental Noise Study (ICF, 2018), all analyzed future traffic noise levels would change by 0.1 decibel (dB) or less, which is imperceptible to the human ear. As shown in Table 2, the Project's contribution to cumulative traffic noise increases would be 0 to 0.1 dB; this change would also be imperceptible to the human ear. Therefore, the Project would not result in any significant contribution to cumulative traffic noise impacts.

Air Quality

As discussed in the Class 32 Categorical Exemption memorandum, August 2018 *Air Quality Analysis for the 806 W. Adams Residential Project* (ICF, 2018), and July 2019 *Supplemental Environmental Analysis for the 806 W. Adams Boulevard Residential Project* (ICF, 2019), Project construction would generate criteria pollutants, ozone precursor pollutants, and small amounts of Toxic Air Contaminants (TACs); however, such emissions would not exceed South Coast Air Quality Management District (SCAQMD) regional mass emissions thresholds or localized significance thresholds. Project operation would also generate criteria pollutant and ozone precursor pollutants. However, emissions from long-term operations were determined not to exceed the SCAQMD regional mass emissions thresholds or localized significance thresholds, or create a Carbon Monoxide (CO) hot spot. The Project was also determined to be consistent with the SCAQMD 2016 Air Quality Management Plan (AQMP), as it is consistent with AQMP growth assumptions and SCAG's regional growth forecast and smart growth policies and objectives. Because the AQMP and applicable SCAQMD air quality standards for individual projects are set at levels that would attain meeting air quality standards in the basin even with projected growth, projects that are consistent

Table 2. Updated Predicted Cumulative Traffic Noise Levels

Roadway/Segment	Estimated Traffic Noise Levels at 50 feet from Roadway Centerline (dB CNEL)				
	Existing (Baseline) ^a	Future without Project	Future with Project	Increase over Existing (Cumulative)	Increase over Future without Project
23rd Street					
West of Hoover Street	58.3	58.4	58.4	0.1	0.0
East of Hoover Street	59.3	59.5	59.5	0.2	0.0
Adams Boulevard					
West of Vermont Avenue	67.3	68.0	68.0	0.7	0.0
East of Vermont Avenue	67.8	68.4	68.4	0.6	0.0
West of Hoover Street	67.7	68.3	68.3	0.6	0.0
East of Hoover Street	67.3	67.9	68.0	0.7	0.1
West of Figueroa Street	67.2	67.8	67.8	0.6	0.0
East of Figueroa Street	67.0	68.2	68.2	1.2	0.0
West of Grand Avenue	65.9	67.8	67.8	1.9	0.0
East of Grand Avenue	65.7	67.2	67.2	1.5	0.0
30th Street					
West of Hoover Street	61.5	61.8	61.9	0.4	0.1
East of Hoover Street	61.0	61.3	61.3	0.3	0.0
Vermont Avenue					
North of Adams Boulevard	68.3	69.1	69.1	0.8	0.0
South of Adams Boulevard	68.1	69.1	69.1	1.0	0.0
Hoover Street					
North of 23 rd Street	68.4	68.8	68.8	0.4	0.0
South of 23 rd Street	67.8	68.3	68.3	0.5	0.0
North of Adams Boulevard	68.6	69.0	69.0	0.4	0.0
South of Adams Boulevard	67.9	68.2	68.3	0.4	0.1
North of 30 th Street	67.6	67.9	68.0	0.4	0.1
South of 30 th Street	66.2	66.5	66.5	0.3	0.0
Figueroa Street					
North of Adams Boulevard	68.2	69.9	69.9	1.7	0.0
South of Adams Boulevard	68.0	69.9	69.9	1.9	0.0
Grand Avenue					
North of Adams Boulevard	65.9	68.7	68.7	2.8	0.0
South of Adams Boulevard	65.8	67.7	67.7	1.9	0.0

^a Existing (baseline) noise levels are included for reference but did not change.

dB = decibels

CNEL = Community Noise Equivalent Level

with the AQMP, and thus consistent with SCAG growth projections and air quality standards, are determined in accordance with SCAQMD guidance to not result in significant cumulative impacts.² Therefore, the Project would not contribute to a significant cumulative air quality impact.

Revised Cumulative Analysis

The Potential Related Projects have no effect on the development intensity of the Project relative to what was previously analyzed and disclosed in the 2018 Class 32 Categorical Exemption and 2019 Supplemental Environmental Analysis. Accordingly, there would be no change in Project-generated construction or operational emissions. Ozone precursors and criteria pollutants would remain under SCAQMD daily emission thresholds, and therefore would not be cumulatively considerable.

While Project-generated traffic volumes would not change under the revised cumulative analysis, additional development in the vicinity of the Project would increase cumulative traffic volumes, potentially worsening congestion and associated localized CO concentrations. However, even with the proportionate increase in background traffic volumes that would result from the Potential Related Projects compared to the analysis of CO concentrations presented in the August 2018 *Air Quality Analysis for the 806 W. Adams Residential Project* (2018 Air Quality Memo), cumulative CO concentrations under the revised cumulative analysis would remain below the ambient air quality standards. Specifically, as discussed in the 2018 Air Quality Memo, CO hot-spot modeling conducted by SCAQMD for their 2003 AQMP demonstrates that the most heavily congested intersection in Los Angeles County, which has an average daily traffic volume of approximately 100,000 vehicles per day, would violate the CO ambient air quality standards. The highest daily traffic volumes generated at the roadways within the vicinity of the Project caused by the Project and Potential Related Projects would be a cumulative total of 59,035 vehicles per day. This maximum cumulative figure applies to all daily combined trips on all road segments and intersections, not the maximum at any one intersection. This total number is approximately only 59 percent of the vehicles per day at the busiest intersection in the 2003 AQMP's CO hot spots analysis. Accordingly, the Project would not create a CO hot-spot under the revised cumulative analysis. Therefore, with the addition of the related projects, the Project would not contribute to a significant cumulative air quality impact.

Water Quality

As discussed in the Class 32 Categorical Exemption memorandum and 2019 Supplemental Environmental Analysis, a minimum of 25 percent of exterior the open space areas would be planted with ground cover in accordance with the LAMC. Project construction would include Best Management Practices (BMPs) set forth in a stormwater pollution prevention plan (SWPPP) in accordance with the State Stormwater NPDES Construction General Permit administered by the State Water Resources Control Board (SWRCB), compliance with which would be regulated by the Los Angeles Regional Water Quality Control Board. The Project would also comply with LAMC provisions related to stormwater and urban runoff pollution and Low Impact Development (LID) strategies. applicable to all projects that require building permits, and the Project applicant would be required to prepare and implement a stormwater mitigation plan and incorporate stormwater mitigation measures into the design plans for review and approval by the City Department of Building and Safety before a building permit for the Project is issued. As a result of compliance with these regulatory requirements, the Project was determined not to result in the

² See South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D, at p. D-3. <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>

degradation of stormwater runoff and would not result in significant impacts relating to water quality. Therefore, the Project would not contribute to a significant cumulative water quality impact.

Revised Cumulative Analysis

The addition of the related projects to the Project's cumulative analysis would not change the Project's characteristics, such as the total open space to be provided on site and the commitment to plant 25 percent of exterior the open space areas with ground cover. The Project would continue to comply with all requirements related to the protection of water quality during construction and operation of the Project, including a SWPPP and City LID Ordinance compliance requirements. Given their respective distances from the Project site, the majority of the Potential Related Projects, with the possible exception of Related Project 3, would be served by different storm drains than the Project. Like the Project, each of the Potential Related Projects would be required to comply with applicable regulatory standards and requirements. Therefore, in conjunction with the Potential Related Projects, the Project would not contribute to a significant cumulative impact on water quality.

Summary and Conclusions

Based on analysis of the of the potential cumulative impacts caused by the Potential Related Projects, and considering the less-than-significant impacts that would result from the Project, the Project would not make a cumulatively considerable contribution to any significant cumulative impacts when considering it along with other related past, present, and reasonably foreseeable future projects, including the Potential Related Projects. The revisions to the cumulative analysis would not change the conclusions presented in the Class 32 Categorical Exemption memorandum prepared for the Project by ICF on October 5, 2018, as amended by the 2019 Supplemental Environmental Analysis. As such, the Project qualifies for a Class 32 Categorical Exemption.

References

- California Natural Diversity Database. 2018. Plant and Animal Occurrences within 2 Miles of Project Site.
- Gibson Traffic Consulting, Inc. 2018. Traffic Impact Study for the Proposed Residential Development at 806 West Adams Boulevard.
- Gibson Traffic Consulting, Inc. 2019. Supplemental Analysis for 806 West Adams Boulevard, Los Angeles, California.
- Gibson Traffic Consulting, Inc. 2021. 806 W. Adams Supplemental Traffic Analysis, Los Angeles, California.
- Historic Resources Group. 2018. Phase 1 Historical Resource Assessment Report for 806 W. Adams Blvd.
- ICF. 2018. Limited Phase I Environmental Site Assessment for the 806 W. Adams Residential Project.
- ICF. 2018. Air Quality Analysis for the 806 W. Adams Residential Project.

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ATTACHMENT A: SUPPLEMENTAL TRAFFIC ANALYSIS



CONFIDENTIAL DRAFT

MEMORANDUM

TO: City of Los Angeles Department of City Planning

FROM: Sarah M. Drobis, P.E., and David Roachford

DATE: September 14, 2021

RE: 806 W Adams Supplemental Traffic Analysis
Los Angeles, California

Ref: J1578a

Gibson Transportation Consulting, Inc. (GTC) was asked to conduct a supplemental traffic analysis based on review of the list of additional development projects provided by the Los Angeles Department of City Planning (City Planning) as part of the appeal process for the 806 W. Adams Street Project (Project). This memorandum summarizes our review and the related traffic analyses.

BACKGROUND

GTC prepared a Transportation Impact Study and a Supplemental Transportation Analysis in June 2018 and July 2019, respectively (collectively referred to herein as Transportation Study) analyzing the potential project-level and cumulative transportation impacts on the Project. The Los Angeles Department of Transportation (LADOT) approved the Transportation Study and issued an approval letter dated August 29, 2018, and an update dated July 23, 2019.

Subsequently, City Planning provided a list of potential development projects (Related Projects) undergoing environmental review (Exhibit A of the City Planning appeal response letter dated August 12, 2021). GTC reviewed the list and compared it to the list of Related Projects considered in the approved Transportation Study. Based on the comparison, GTC determined that two of the nine Related Projects had been previously considered as part of the Transportation Study. The remaining seven projects on the list were conservatively considered to be within the study area to provide a worst-case analysis.

GTC updated the list of Related Projects and prepared a supplemental cumulative operational traffic analysis to confirm the impact conclusions of the Transportation Study are still valid. The approved Transportation Study measured potential transportation impacts using the previous metric of level of service (LOS), which as of July 2020 is no longer valid but was analyzed in this memorandum for informational purposes only. This memorandum also provides an analysis of the Project's potential project-level and cumulative impacts under the current vehicle miles traveled (VMT) metric, as required by *Transportation Assessment Guidelines* (LADOT, Updated August 2021) (TAG).

UPDATED RELATED PROJECTS LIST

As discussed above, City Planning provided a list of development projects within the University Park area, shown in Table 1. GTC updated the list of Related Projects (which was originally provided in Table 6 of the Transportation Study) to include these additional developments and reanalyzed the future conditions for potential cumulative impacts. The full Related Projects list, including these additional Related Projects, is provided in Table 2.

Figure 1 illustrates the locations of the updated Related Projects. Figure 2 illustrates the peak hour traffic volumes of the updated Related Projects at study intersections. Figure 3 illustrates the peak hour traffic volumes under Future without Project Conditions. Figure 4 illustrates the peak hour traffic volumes under Future with Project Conditions.

OPERATIONAL ANALYSES UTILIZING LOS METRIC (INFORMATIONAL PURPOSES ONLY)

Similar to the analysis presented in the Transportation Study, the Future without Project Conditions present a “baseline” future condition for a cumulative impact analysis of the Project. To determine this condition, traffic volume forecasts illustrated in Figure 3 were developed by applying an ambient growth rate of 1% per year compounded annually to account for growth in traffic over Existing Conditions and by adding the updated Related Projects traffic volumes illustrated in Figure 2. This is a conservative approach as many of the Related Projects are already reflected in the ambient growth. To provide a conservative analysis, the Project buildout year was also extended to Year 2024, adding an additional three years of traffic growth.

Table 3 summarizes the operational impacts of Project traffic during the weekday morning and afternoon peak hours under future cumulative conditions with consideration of the updated Related Projects and additional ambient traffic growth. As shown, and consistent with the analysis and conclusions in the Transportation Study, the Project is not anticipated to result in a significant impact at any of the analyzed intersections under Future with Project Conditions, which presents a cumulative impact analysis of the Project.

In summary, including the additional Related Projects and ambient traffic growth in the operational analysis of the Project’s potential transportation impacts does not result in significant transportation impacts under the previously applicable LOS metric and, therefore, does not change the findings of the approved Transportation Study. The Project’s potential cumulative impacts remain less than significant, and no mitigation is required. Detailed analysis worksheets are provided in Attachment A.

VMT ANALYSES

Causing Substantial VMT

Threshold T-2.1 of the TAG analyzes whether a project causes substantial VMT and is generally applied to land use projects. Specifically, Threshold T-2.1 inquires whether a project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1), which states that (for land use projects) “vehicle miles travelled exceeding an applicable threshold of

significance may indicate a significant impact.” This subdivision also states that a lead agency has discretion to choose the most appropriate method to evaluate a project’s VMT.

Per Section 2.2.2 of the TAG, a “no impact” determination can be made for a project if either of the following screening criteria are not met for Threshold T-2:

- *T-2.1-1: Would the land use project generate a net increase of 250 or more daily vehicle trips?*
- *T-2.1-2: Would the project generate a net increase in daily VMT?*

VMT Methodology

The following describes the methodology by which vehicle trips and VMT are calculated in *City of Los Angeles VMT Calculator Version 1.3* (July 2020) (VMT Calculator), as detailed in *City of Los Angeles VMT Calculator Documentation* (LADOT and City Planning, May 2020). LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits.

As detailed in *City of Los Angeles VMT Calculator Documentation*, the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, and the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Governor’s Office of Planning and Research, December 2018).

Table 2.2-1 of the TAG details the following daily household VMT per capita and daily work VMT per employee impact criteria for the Area Planning Commission (APC) areas:

APC	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

Source: TAG

The Project is located in the South Los Angeles APC.

Project VMT Analysis

The VMT Calculator was used to evaluate Project VMT for comparison to the VMT impact criteria. Based on guidance from LADOT, the VMT Calculator was modeled for the Project's land use and density as the primary input.

The VMT analysis results based on the VMT Calculator are summarized in Table 4.

As shown in Table 4 and Attachment B, the VMT Calculator estimates that the Project would generate 2,475 daily VMT. Thus, the Project would generate an average household VMT per capita of 5.6. The average household VMT per capita would not exceed the South Los Angeles APC significant household VMT per capita impact threshold of 6.0 and, therefore, the overall Project would not result in a significant VMT impact, and no mitigation measures would be required.

The detailed output from the VMT Calculator is provided in Appendix B.

Cumulative VMT Analysis

Cumulative effects of development projects are determined based on the consistency with the air quality and greenhouse gas (GHG) reduction goals of *Connect SoCal – 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy* (Southern California Association of Governments, Adopted September 2020) (RTP/SCS) in terms of development location, density, and intensity. The RTP/SCS presents a long-term vision for the region's transportation system through Year 2045 and balances the region's future mobility and housing needs with economic, environmental, and public health goals.

As detailed in the TAG, for projects that do not demonstrate a project-level impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient to demonstrate no cumulative VMT impact, as projects shown to be under the applicable project-level VMT metric also demonstrate compliance with the long-term regional VMT and GHG reduction goals of the RTP/SCS.

This Project would not result in a significant VMT impact, as described above. Therefore, the Project is not anticipated to result in a cumulative VMT impact under Threshold T-2.1, and no further evaluation or mitigation measures would be required.

Furthermore, the Project site and study area are well-served by multiple transit options. The Project would also contribute to the productivity and use of the regional transportation system by providing housing near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with RTP/SCS goals. Thus, the Project encourages a variety of transportation options and is consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region.

CONCLUSION

As described above, the results of this supplemental analysis are consistent with the analysis and conclusions in the Transportation Study. No study intersections would be significantly impacted in the Future Conditions under the prior LOS metric, consistent with the results of the Transportation Study.

In addition, the Project's potential cumulative VMT impacts would be less than significant as the Project is below the 6.0 household VMT per capita threshold for the South Los Angeles APC.

Therefore, the supplemental analysis of the traffic impacts under Future with Project Conditions does not result in any new significant cumulative transportation impacts or materially different transportation impacts than were previously analyzed, and the conclusions presented in the Transportation Study are still valid.

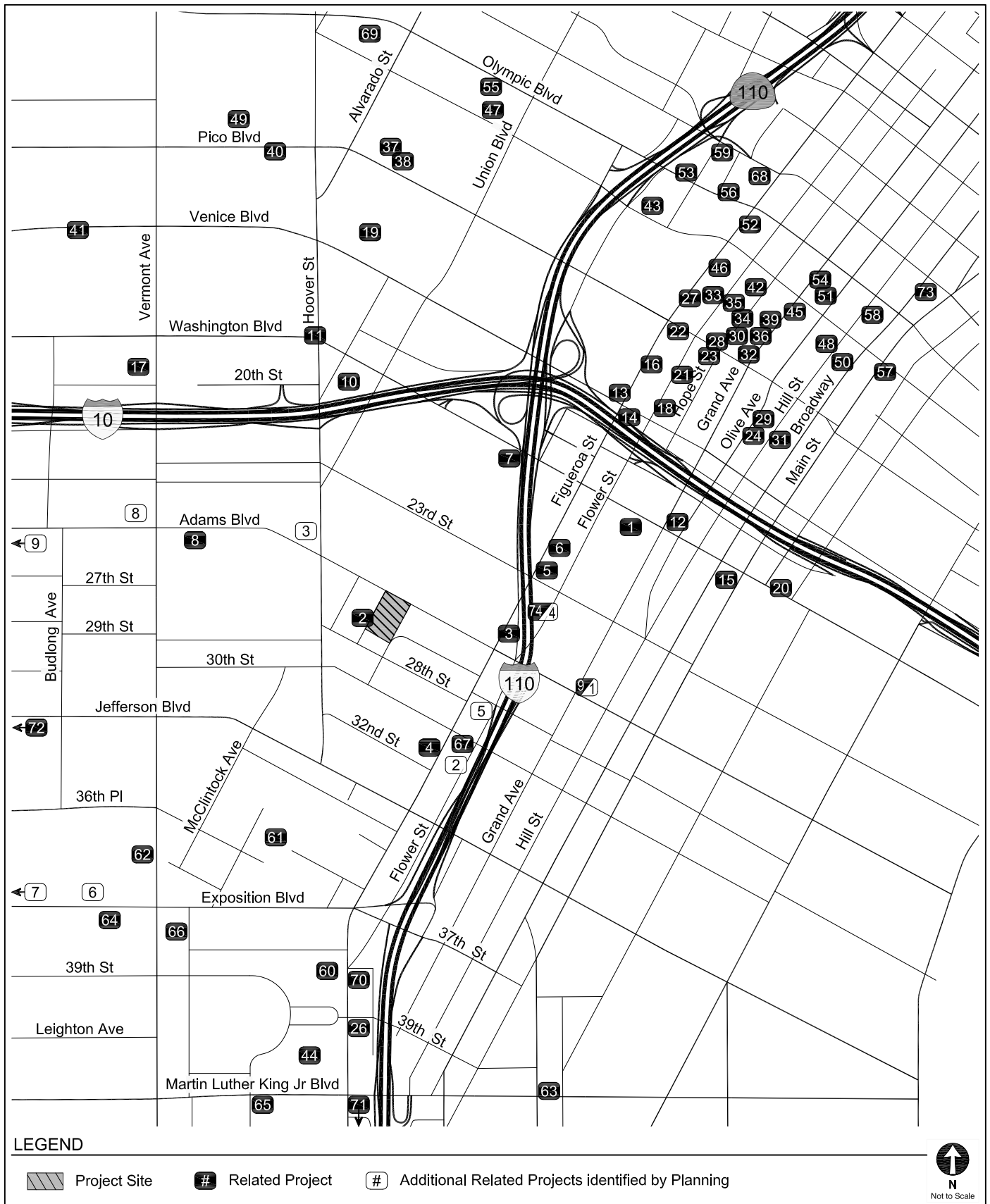
Communication from Public

Name: Andrew Brady

Date Submitted: 03/31/2022 03:11 PM

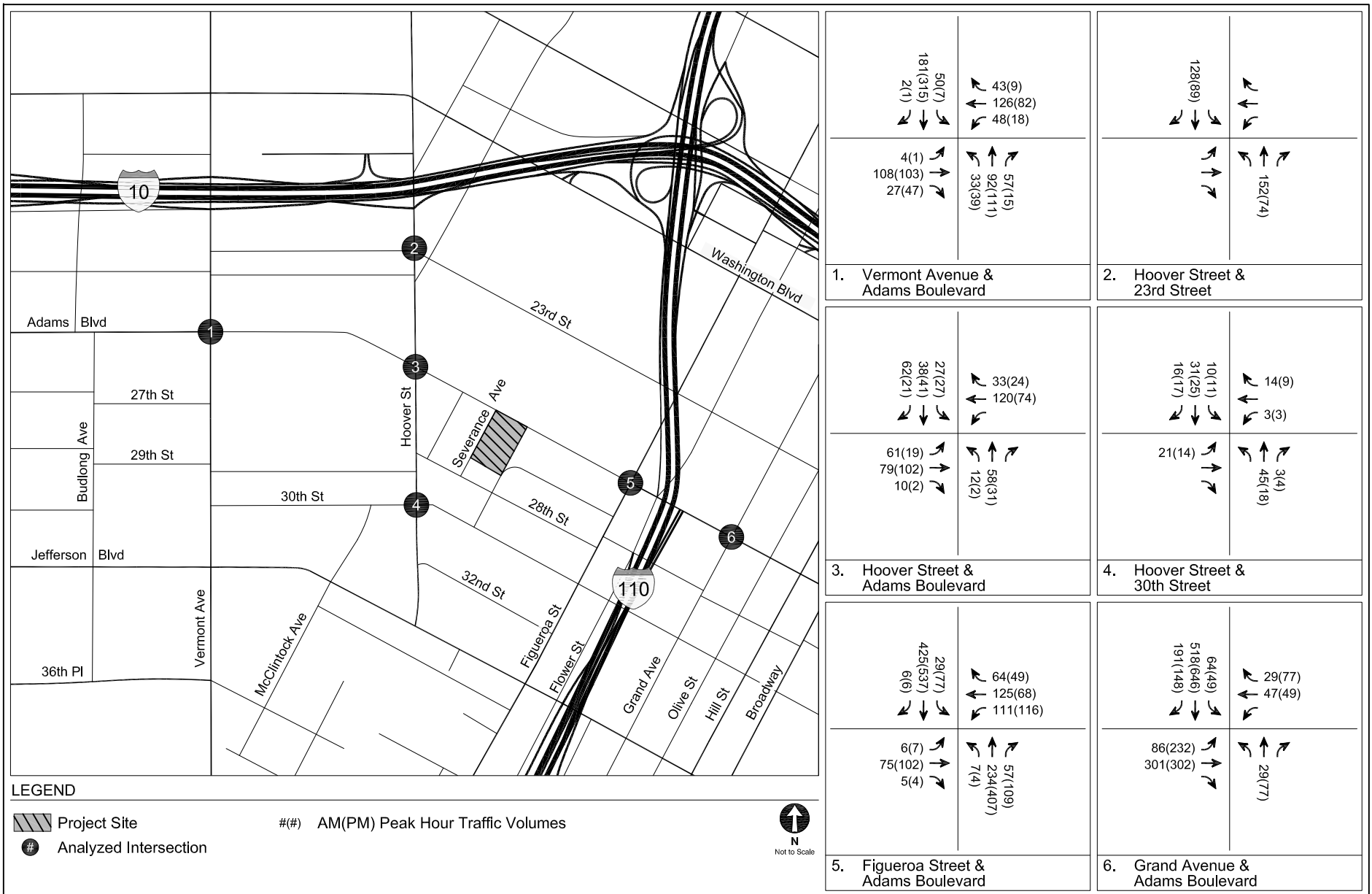
Council File No: 19-1603-S1

Comments for Public Posting: Please see the attached letter from the Applicant's representative, Andrew Brady of DLA Piper. Part of 4 of 4 documents attached.



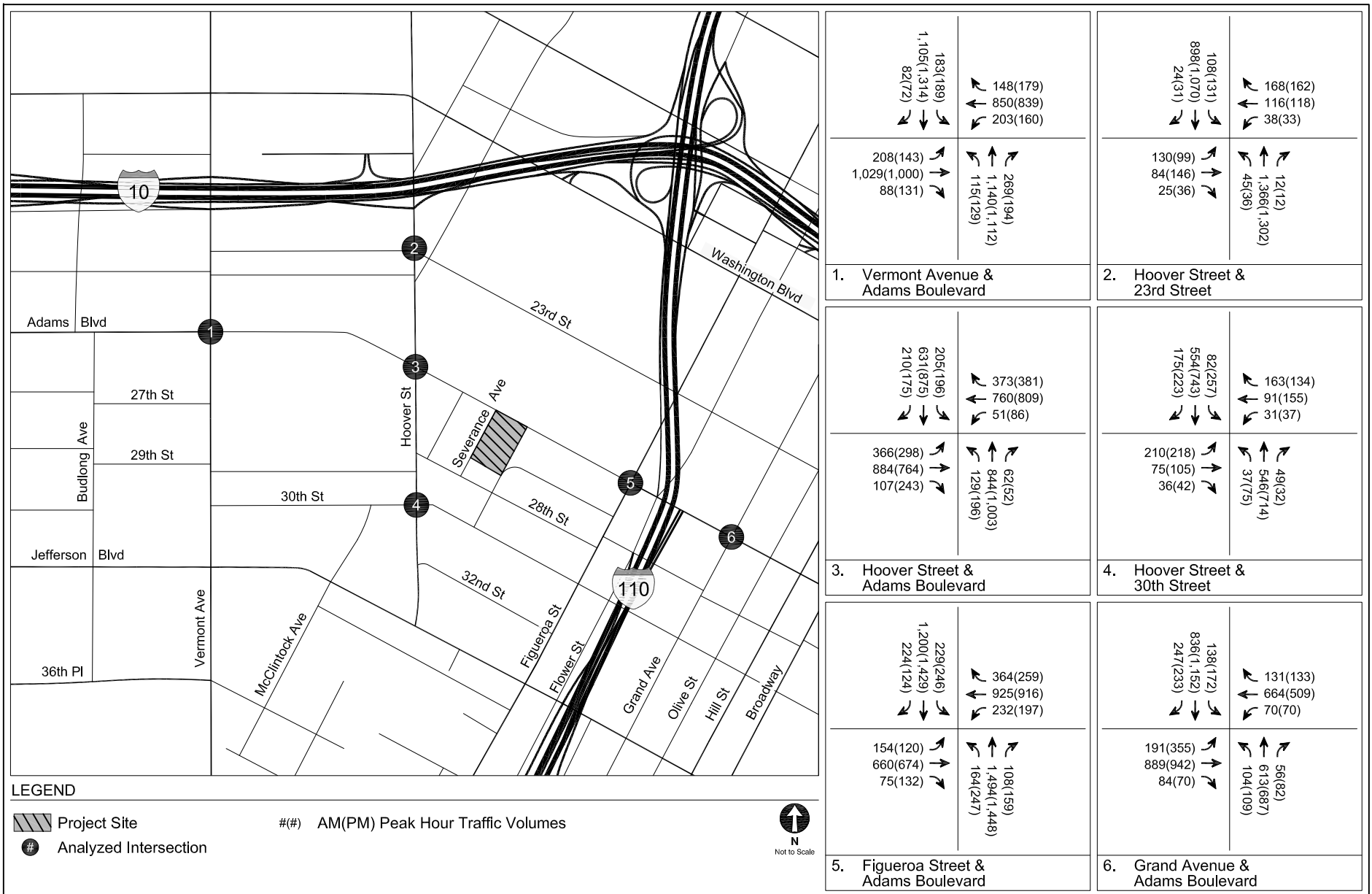
LOCATIONS OF RELATED PROJECTS

FIGURE
1



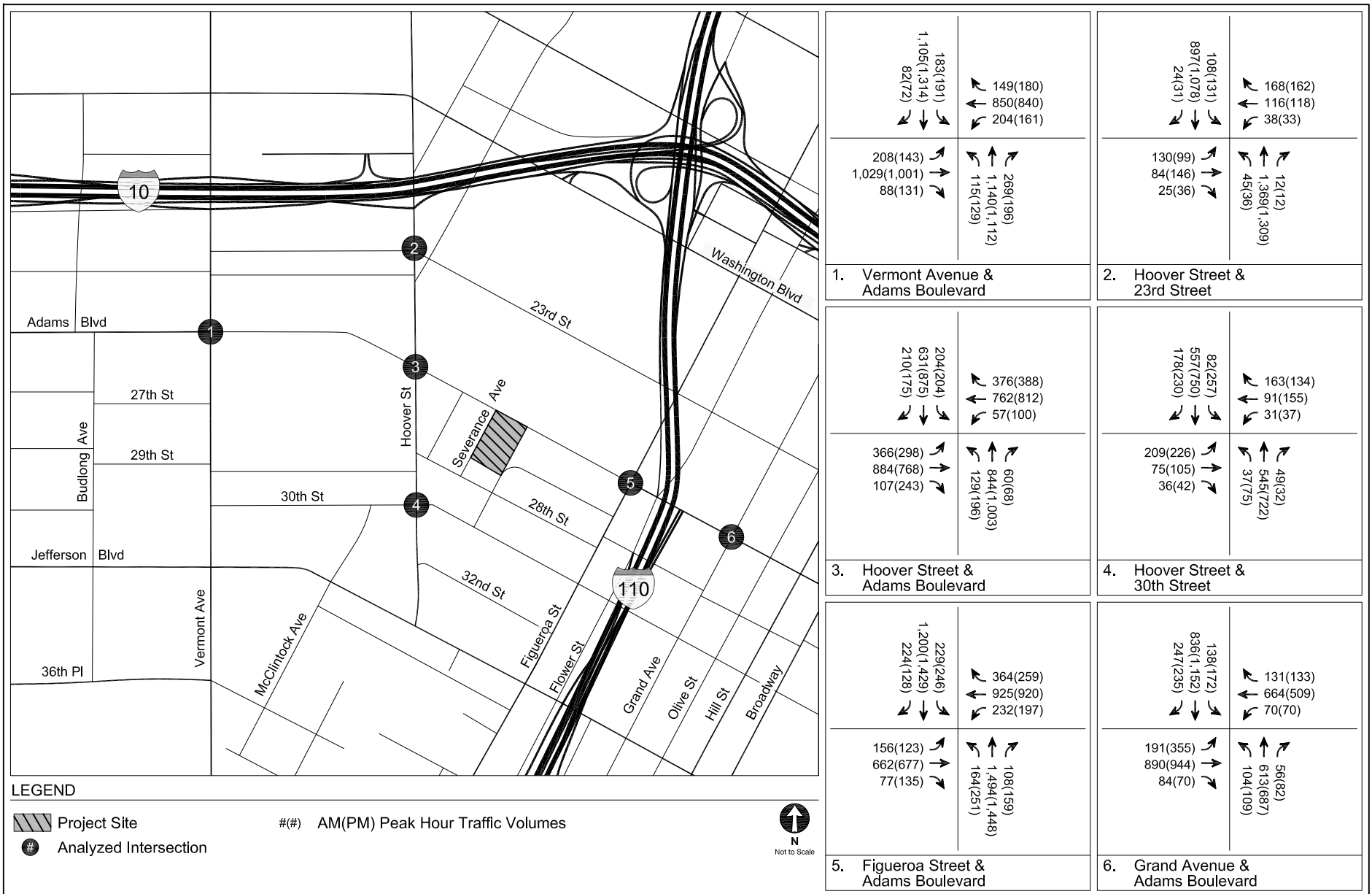
RELATED PROJECT-ONLY
PEAK HOUR TRAFFIC VOLUMES

FIGURE
2



FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2024)
PEAK HOUR TRAFFIC VOLUMES

FIGURE
3



FUTURE WITH PROJECT CONDITIONS (YEAR 2024)
PEAK HOUR TRAFFIC VOLUMES

FIGURE
4

TABLE 1
ADDITIONAL RELATED PROJECTS
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates [a]						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
1 [b]	Mixed-Use	243 W Adams Blvd	296 apartments	2,167	31	105	136	105	61	166
2 [c]	USC Student Housing	505 W 31st St	73 apartment units	380	7	23	30	23	13	36
3 [d]	2595 S Hoover St	2595 S Hoover St	46 townhomes	337	5	16	21	16	10	26
4	2321 S Flower St	2321 S Flower St	280 apartments	2,050	30	99	129	99	58	157
5	2813 S Flower St	2813 S Flower St	47 hotel rooms	393	13	9	22	14	14	28
6	1069 W Exposition Blvd	1069 W Exposition Blvd	52 apartments	381	6	18	24	18	11	29
7	1265 W Exposition Blvd	1265 W Exposition Blvd	108 apartments	791	12	38	50	38	22	60
8	1421 W Adams Blvd	1421 W Adams Blvd	45 apartments	329	5	16	21	16	9	25
9	1840 W Adams Blvd	1840 W Adams Blvd	10 small lot townhomes	73	1	4	5	4	2	6

Notes:

[a] Additional related projects identified by LADCP in Appeal of ENV-2018-2454-CE; CF 19-1603-S1. Trip Generation Estimates based on Trip Generation, 10th Edition, Institute of Transportation Engineers, 2017.

[b] #9 in project list. Project description changed from LADOT list

[c] #67 in project list. Same as before, clarified its 73 units

[d] Built and occupied

TABLE 2
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
Initial Related Projects Submitted										
1	LA Trade Tech College	400 W Washington Bl	6,300 students	--	101	38	139	172	80	253
2	USC Children's Creative Learning Center	2716 S Severance St	9,955 sf child care center	737	64	57	121	58	65	123
3	Apartment Project (Figueroa & Adams Student Housing)	2455 S Figueroa St	145 apartment units	870	8	51	64	54	28	82
4	Figueroa Hotel	3101 S Figueroa St	275 hotel rooms and 1,178 sf bar	1,167	48	33	81	48	51	99
5	2222 Figueroa	2222 S Figueroa St	1,063 condominium units and 18,000 sf retail	6,945	91	394	485	403	217	620
6	Mixed-Use	2100 S Figueroa St	291 condominium units and 7,134 sf retail	870	-82	66	-16	67	-28	39
7	Mixed-Use	720 W Washington Bl	105 senior apartment units and 2,650 sf retail	350	7	12	19	13	12	25
8	K-8 Charter School	1342 W Adams Bl	500 students	993	239	196	435	30	40	70
9	Mixed-Use	243 W Adams Bl	300 apartment units, 2,500 sf retail, and 2,500 restaurant	990	5	99	104	72	10	82
10	Medical Office	1122 W Washington Bl	60,000 sf office	2,060	107	29	136	57	146	203
11	Pharmacy / Drug Store	1302 W Washington Bl	16,572 sf drug store	414	-33	-18	-51	21	12	33
12	Mixed-Use	233 W Washington Bl	160 apartment units and 24,000 sf retail	1,764	25	56	81	89	71	160
13	Convention Center Modernization	NW Corner of Figueroa St & Venice Bl	Increase floor area by 37,799 sf	2,690	--	--	--	44	225	269
14	1600 S Figueroa	1600 S Figueroa	336 apartment units and 250 hotel rooms	4,227	112	191	303	212	146	358

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
15	The Reef - LA Mart/SOLA Village	1900 S Broadway	500 condominium units, 500 apartment units, 210 hotel rms, 143,100 sf retail, 180,000 sf office, 17,600 sf gallery/museum, and 8,000 sf auto	--	390	552	942	637	566	1,203
16	1400 S Figueroa Street Residential Project	1400 S Figueroa St	106 apartment units and 4,834 sf retail	647	10	38	48	39	22	61
17	1620 Cordova St Charter School	1620 W Cordova St	400 students	527	105	66	171	16	20	36
18	1370 S Flower St Residential	1410 S Flower St	152 apartment units and 1,184 sf retail	1,062	17	62	79	63	35	98
19	1420 Bonnie Brae Apartments	1420 Bonnie Brae St	26 apartment units	193	3	12	15	12	6	18
20	Washington Blvd Opportunity - Mercy housing	220 E Washington Bl	230 new apartment units, 32 renovated apartment units, and 19,000 sf retail/restaurant	2,113	38	118	156	125	53	178
21	Mixed-Use	1334 S Flower St	188 apartment units and 10,096 sf retail/restaurant	1,038	(3)	63	60	67	22	89
22	City Lights	1300 S Figueroa St	1,024 hotel rooms	9,134	398	288	686	351	366	717
23	SPR - Mixed-Use	1306 Hope St	419 apartment units and 42,000 sf retail	4,280	88	105	194	136	102	238
24	Mixed-Use	215 W 14th St	154 apartment units and 10,700 sf retail	1,481	22	67	89	81	54	135
25	1323 S Grand Ave	1323 S Grand Ave	284 apartment units and 6,300 sf commercial	2,158	33	118	151	126	74	200
26	The Fig	3900 S Figueroa St	298 hotel rooms, 52,614 sf retail/restaurant, 222 student housing units, 186 apartment units, and 16,910 sf office	8,327	307	281	588	372	304	676
27	Fig + Pico Conference Center Hotels	1248-1260 S Figueroa St	1,162 hotel rooms and 13,145 sf restaurant	5,720	192	125	317	203	212	415
28	SPR-Mixed-use Onyx West & East	1300 S Hope St	419 apartment units and 42,000 sf retail	4,280	88	105	193	136	102	238

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
29	14th & Olive Mixed-Use	1340 S Olive St	156 apartment units, 5,000 sf retail and 10,000 sf restaurant	1,700	51	82	133	89	57	146
30	Morrison Hotel	1246 S Hope St	258 high-rise apartments, 265 hotel rooms, and 6,000 sf retail	889	88	99	187	120	100	220
31	14th St/Hill St (DTLA) Mixed-Use	1340 S Hill St	233 apartment units	1,755	11	103	114	108	30	138
32	Apartments	1247 S Grand Ave	115 apartment units and 4,610 sf retail	763	10	41	51	42	25	67
33	Circa (1200 Figueroa Project)	1200 S Figueroa St	648 condominium units and 48,000 sf retail	7,344	231	159	390	284	283	567
34	1219 S Hope St	1219 S Hope St	75 hotel rooms and 2,650 sf retail	613	23	16	39	23	22	45
35	Flower Mixed-Use	1212 S Flower St	730 condominium units and 7,873 sf retail	3,956	78	233	311	229	121	350
36	Grand Residence	1229 S Grand Ave	161 condominium units and 3,000 sf restaurant	1,116	23	62	85	62	33	95
37	Laborers Local 300 Headquarters	2005 W Pico Blvd	30,300 sf office space and 4,500 sf assembly hall	224	28	4	32	5	25	30
38	Charter High School	1929 W Pico Bl	480 students	821	140	66	206	20	42	62
39	1201 S Grand Ave	1201 S Grand Ave	126 condominium units	732	9	46	55	44	22	66
40	2250-2270 W Pico Blvd Hotel	2250-2270 W Pico Blvd	125-room hotel	409	26	19	45	10	9	19
41	Self-Storage	1810 W Venice Bl	154,024 sf self-storage	385	12	10	22	20	20	40
42	Amacon Project	1133 S Hope St	208 condominium units and 5,029 sf retail	1,543	20	74	94	91	50	141

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
43	JW Marriott Headquarters Hotel and Conference Center Expansion	1005 W Chick Hearn Ct	170,000 sf conference/meeting space	5,174	207	107	314	205	214	419
44	LAFC	3939-3999 S Figueroa St	22,000-seat stadium, 82,000 sf commercial, and 25,000 sf office/conference	13,519	1,145	68	1,213	2,019	160	2,179
45	DTLA South Park Site 1, 1A	1120 S Grand Ave	666 apartment units and 20,690 sf retail	2,730	42	127	170	136	93	229
46	Fig Central	1101 S Flower St	504 condominium units, 183 hotel rooms, and 166,000 sf retail	11,512	190	282	472	527	461	988
47	1633 W 11th St Charter School (K-5)	1633 W 11th St	460 seats	970	194	158	352	29	37	66
48	11th & Hill Project	1115 S Hill St	172 condominium units and 6,850 sf restaurant	543	-45	40	-5	50	-7	43
49	Apartments	1255 E Elden Ave	93 apartment units	376	0	32	32	28	10	38
50	Mixed-Use (Herald Examiner)	1111 S Broadway	214 apartment units and 10,000 sf retail	5,198	144	176	319	258	274	532
51	1045 S Olive Street	1045 S Olive St	800 condominium units and 15,000 sf retail	5,289	69	297	366	306	166	472
52	LUXE Hotel Mixed-Use project	1020 S Figueroa St	435 condominium units, 300 hotel rooms, and 58,959 sf retail	4,859	150	199	349	228	169	397
53	Olympia Mixed-Use	1001 Olympic Bl	1,367 apartment units, 20,000 sf retail, and 20,000 sf restaurant	5,216	86	297	383	283	115	398
54	Restaurant	1036 S Grand Ave	7,149 sf restaurant	492	2	3	5	27	14	41
55	1700 W Olympic Hotel	1700 W Olympic Bl	160 hotel rooms	1,157	44	32	76	45	42	87
56	Olympic Tower	813 W Olympic Bl	374 condominium units, 373 hotel rooms, 33,498 sf office, 65,074 sf retail, and 10,801 sf conference center	4,423	166	170	336	189	185	374

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
57	Mixed-use	1100 S Main St	379 apartment units and 25,810 sf retail	385	9	103	112	78	14	92
58	Olympic & Hill Mixed Use	1030 S Hill St	700 apartment units, 7,000 sf retail, 7,000 sf restaurant	3,392	49	193	242	181	104	285
59	Downtown LA Hotel	926 James M Wood Bl	247 hotel rooms	1,592	59	42	101	59	56	115
60	California African American Museum	600 State Dr	Renovate 26,400 sf existing museum & construct 77,100 sf new space	154	14	1	15	2	34	36
61	USC University Park Master Plan			13,574	--	--	732	--	--	1,057
62	South LA Redevelopment 3A	3671 S Vermont Ave	80 apartment units and 50,000 sf retail	1,744	24	42	66	85	73	156
63	Accelerated Charter Elementary School	107 E Martin Luther King Jr Blvd	500 seat elementary school	650	124	101	225	0	0	0
64	Rolland Curtis Gardens MU	1077 W 38th St	140 apartment units and 9,000 sf retail	769	9	51	59	48	28	73
65	Honda of Downtown LA	740 W Martin Luther King Jr Blvd	39,406 sf car dealership with auto service area	1,146	51	17	68	37	56	93
66	Lucas Museum of Narrative Art	3800 Vermont Ave	325,000 sf museum	5,246	81	162	243	243	165	408
67	USC Student Housing	505 W 31st St	7 story student housing	380	7	23	30	23	13	36
68	Figueroa Centre	911 S Figueroa St	220 hotel rooms, 200 apartment units, and 94,080 sf commercial	7,141	145	164	309	316	289	605
69	Assisted Living	1030 S Lake St	338 Assisted living beds and 34 senior housing units	939	39	23	62	49	48	97
70	Mixed-use	3800 S Figueroa St	90 apartment units and 9,600 sf retail	605	5	31	36	35	19	54

Notes

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

TABLE 2 (CONTINUED)
RELATED PROJECT TRIP GENERATION ESTIMATES
806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Project	Address	Description	Trip Generation Estimates						
				Daily	Morning Peak Hour			Afternoon Peak Hour		
					In	Out	Total	In	Out	Total
71	Mixed-use	4050 S Figueroa St	57 affordable apartment units and 3,700 sf office	201	12	17	29	10	9	19
72	3500 Normandie Av Charter School	1372 W 35th St	350 students	111	22	19	41	13	15	28
73	Broadway Palace	928 S Broadway	667 apartment units, 17 condominium units, and 58,800 sf retail	4,715	21	229	250	272	109	381
74	2327 S Flower St	2327 S Flower St	132 dwelling units	718	12	36	48	16	42	58
Additional Related Projects identified by Planning [a]										
1 [b]	Mixed-Use	243 W Adams Blvd	296 apartments	2,167	31	105	136	105	61	166
2 [c]	USC Student Housing	505 W 31st St	73 apartment units	380	7	23	30	23	13	36
3 [d]	2595 S Hoover St	2595 S Hoover St	46 townhomes	337	5	16	21	16	10	26
4	2321 S Flower St	2321 S Flower St	280 apartments	2,050	30	99	129	99	58	157
5	2813 S Flower St	2813 S Flower St	47 hotel rooms	393	13	9	22	14	14	28
6	1069 W Exposition Blvd	1069 W Exposition Blvd	52 apartments	381	6	18	24	18	11	29
7	1265 W Exposition Blvd	1265 W Exposition Blvd	108 apartments	791	12	38	50	38	22	60
8	1421 W Adams Blvd	1421 W Adams Blvd	45 apartments	329	5	16	21	16	9	25
9	1840 W Adams Blvd	1840 W Adams Blvd	10 small lot townhomes	73	1	4	5	4	2	6

Notes:

Source: Table 6 in *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018. Projects in this study based on information from LADOT & LADCP, April, 2018

[a] Additional related projects identified by LADCP in Appeal of ENV-2018-2454-CE; CF 19-1603-S1. Trip Generation Estimates based on Trip Generation, 10th Edition, Institute of Transportation Engineers, 2017.

[b] #9 in Related Project list. Project description changed from initial LADOT list in 2018.

[c] #67 in project list. Identical as before, clarified description as 73 units

[d] Built and occupied prior to 2018.

TABLE 3
FUTURE WITH PROJECT CONDITIONS (YEAR 2024)
SIGNALIZED INTERSECTION LEVELS OF SERVICE AND SIGNIFICANT IMPACTS
DRAFT 806 W ADAMS BOULEVARD - SUPPLEMENTAL ANALYSES

No.	Intersection	Peak Hour	Future without Project Conditions		Future with Project Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue & Adams Boulevard	A.M.	1.002	F	1.003	F	0.001	NO
		P.M.	1.026	F	1.027	F	0.001	NO
2.	Hoover Street & 23rd Street	A.M.	0.729	C	0.730	C	0.001	NO
		P.M.	0.696	B	0.699	B	0.003	NO
3.	Hoover Street & Adams Boulevard	A.M.	0.899	D	0.899	D	0.000	NO
		P.M.	0.919	E	0.927	E	0.008	NO
4.	Hoover Street & 30th Street	A.M.	0.415	A	0.416	A	0.001	NO
		P.M.	0.586	A	0.595	A	0.009	NO
5.	Figueroa Street & Adams Boulevard	A.M.	1.059	F	1.060	F	0.001	NO
		P.M.	1.081	F	1.088	F	0.007	NO
6.	Grand Avenue & Adams Boulevard	A.M.	0.723	C	0.723	C	0.000	NO
		P.M.	0.885	D	0.886	D	0.001	NO

Notes:

[a] Methodology based on *Transportation Impact Study for the 806 W Adams Boulevard Residential Project*, Gibson Transportation Consulting, Inc. August, 2018.

[b] Results account for additional cumulative related projects shown in Tables 1 and 2 and an additional three years of ambient traffic growth to represent year 2024.

Attachment A
CMA Worksheets

AM2021.xlsm

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:			Hoover Street			Year of Count:			2018		Ambient Growth: (%)			1		Conducted by:		GTC		Date:		August 2021	
		East-West Street:			23rd Street			Projection Year:			2024		Peak Hour:			AM		Reviewed by:				Project:		806 W Adams	
		No. of Phases			2			2			2			2			2			2			2		
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0			0		
		Right Turns: FREE-1, NRTOR-2 or OLA-3?			NB-- 0 SB-- 0			NB-- 0 SB-- 0			NB-- 0 SB-- 0			NB-- 0 SB-- 0			NB-- 0 SB-- 0			NB-- 0 SB-- 0					
		ATSAC-1 or ATSAC+ATCS-2?			EB-- 0 WB-- 0			EB-- 0 WB-- 0			EB-- 0 WB-- 0			EB-- 0 WB-- 0			EB-- 0 WB-- 0			EB-- 0 WB-- 0					
		Override Capacity			2			2			2			2			2			2			2		
		0			0			0			0			0			0			0			0		
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION									
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume						
NORTHBOUND	Left	42	1	42	0	42	42	0	45	1	45	0	45	1	45	0	45	1	45						
	Left-Through		0							0				0				0							
	Through	1144	2	572	3	1147	574	152	1366	2	683	3	1369	2	685	0	1369	2	685						
	Through-Right		0							0				0				0							
	Right	11	1	11	0	11	11	0	12	1	12	0	12	1	12	0	12	1	12						
	Left-Through-Right		0							0				0				0							
SOUTHBOUND	Left	102	1	102	0	102	102	0	108	1	108	0	108	1	108	0	108	1	108						
	Left-Through		0							0				0				0							
	Through	725	1	374	-1	724	374	128	898	1	461	-1	897	1	461	0	897	1	461						
	Through-Right		1							1				1				1							
	Right	23	0	23	0	23	23	0	24	0	24	0	24	0	24	0	24	0	24						
	Left-Through-Right		0							0				0				0							
EASTBOUND	Left	122	0	122	0	122	122	0	130	0	130	0	130	0	130	0	130	0	130						
	Left-Through		0							0				0				0							
	Through	79	0	225	0	79	225	0	84	0	239	0	84	0	239	0	84	0	239						
	Through-Right		0							0				0				0							
	Right	24	0	0	0	24	0	0	25	0	0	0	25	0	0	0	25	0	0						
	Left-Through-Right		1							1				1				1							
WESTBOUND	Left	36	0	36	0	36	36	0	38	0	38	0	38	0	38	0	38	0	38						
	Left-Through		0							0				0				0							
	Through	109	0	303	0	109	303	0	116	0	322	0	116	0	322	0	116	0	322						
	Through-Right		0							0				0				0							
	Right	158	0	0	0	158	0	0	168	0	0	0	168	0	0	0	168	0	0						
	Left-Through-Right		1							1				1				1							
CRITICAL VOLUMES	North-South: 674			North-South: 676			North-South: 791			North-South: 793			North-South: 793												
	East-West: 425			East-West: 425			East-West: 452			East-West: 452			East-West: 452												
	SUM: 1099			SUM: 1101			SUM: 1243			SUM: 1245			SUM: 1245												
VOLUME/CAPACITY (V/C) RATIO:		0.733			0.734			0.829			0.830			0.830											
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.633			0.634			0.729			0.730			0.730											
LEVEL OF SERVICE (LOS):		B			B			C			C			C											

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Hoover Street	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	GTC	Date:	August 2021											
3	East-West Street:	Adams Boulevard	Projection Year:	2024	Peak Hour:	AM	Reviewed by:		Project:	806 W Adams											
No. of Phases Opposed Ø'ing: N/S-1, E/W-2 or Both-3? Right Turns: FREE-1, NRTOR-2 or OLA-3? ATSAC-1 or ATSAC+ATCS-2? Override Capacity			NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0		NB-- 0 SB-- 0 EB-- 0 WB-- 3 2 0												
MOVEMENT			EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT			FUTURE CONDITION W/ PROJECT			FUTURE W/ PROJECT W/ MITIGATION						
			Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	
NORTHBOUND	Left	110	1	110	0	110	110	12	129	1	129	0	129	1	129	0	129	1	129	1	129
	Left-Through		0											0				0		0	
	Through	740	2	370	0	740	370	58	844	2	422	0	844	2	422	0	844	2	422	2	422
	Through-Right		0											0				0		0	
	Right	58	1	34	-2	56	29	0	62	1	37	-2	60	1	31	0	60	1	31	1	31
SOUTHBOUND	Left-Through-Right		0											0				0		0	
	Left-Right		0											0				0		0	
	Left	168	1	168	-1	167	167	27	205	1	205	-1	204	1	204	0	204	1	204	1	204
	Left-Through		0											0				0		0	
	Through	559	2	280	0	559	280	38	631	2	316	0	631	2	316	0	631	2	316	2	316
EASTBOUND	Through-Right		0											0				0		0	
	Right	139	1	0	0	139	0	62	210	1	27	0	210	1	27	0	210	1	27	1	27
	Left-Through-Right		0											0				0		0	
	Left-Right		0											0				0		0	
	Left	287	1	287	0	287	287	61	366	1	366	0	366	1	366	0	366	1	366	1	366
WESTBOUND	Left-Through		0											0				0		0	
	Through	758	2	379	0	758	379	79	884	2	442	0	884	2	442	0	884	2	442	2	442
	Through-Right		0											0				0		0	
	Right	91	1	36	0	91	36	10	107	1	43	0	107	1	43	0	107	1	43	1	43
	Left-Through-Right		0											0				0		0	
CRITICAL VOLUMES	Left-Right		0											0				0		0	
	Left	48	1	48	7	55	55	0	51	1	51	7	58	1	58	0	58	1	58	1	58
	Left-Through		0											0				0		0	
	Through	603	2	302	2	605	303	120	760	2	380	2	762	2	381	0	762	2	381	2	381
	Through-Right		0											0				0		0	
VOLUME/CAPACITY (V/C) RATIO:	Right	320	1	152	3	323	156	33	373	1	168	3	376	1	172	0	376	1	172	1	172
	Left-Through-Right		0											0				0		0	
	Left-Right		0											0				0		0	
	North-South:	538		538	North-South:	537		537	North-South:	627		627	North-South:	626		626	North-South:	626		626	
	East-West:	589		589	East-West:	590		590	East-West:	746		746	East-West:	747		747	East-West:	747		747	
SUM:	SUM:	1127		1127	SUM:	1127		1127	SUM:	1373		1373	SUM:	1373		1373	SUM:	1373		1373	
	VOLUME/CAPACITY (V/C) RATIO:		0.820		0.820		0.820		0.999		0.999		0.999		0.999		0.999		0.999		0.999
	V/C LESS ATSAC/ATCS ADJUSTMENT:		0.720		0.720		0.720		0.899		0.899		0.899		0.899		0.899		0.899		0.899
	LEVEL OF SERVICE (LOS):		C		C		C		D		D		D		D		D		D		D

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.000	Δv/c after mitigation:	0.000
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street: Hoover Street			Year of Count: 2018			Ambient Growth: (%) 1			Conducted by:		GTC		Date: August 2021				
4		East-West Street: 30th Street			Projection Year: 2024			Peak Hour: AM			Reviewed by:				Project: 806 W Adams				
		No. of Phases			3			3			3		3		3				
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0		0		0				
		Right Turns: FREE-1, NRTOR-2 or OLA-3?			NB-- 0 SB-- 0			NB-- 0 SB-- 0			NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0				
		ATSAC-1 or ATSAC+ATCS-2?			EB-- 0 WB-- 0			EB-- 0 WB-- 0			EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0				
		Override Capacity			2			2			2		2		2				
		0			0			0			0		0		0				
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	35	1	35	0	35	35	0	37	1	37	0	37	1	37	0	37	1	37
	Left-Through		0							0				0				0	
	Through	472	2	236	-1	471	236	45	546	2	273	-1	545	2	273	0	545	2	273
	Through-Right		0							0				0				0	
	Right	43	1	30	0	43	30	3	49	1	34	0	49	1	34	0	49	1	34
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
SOUTHBOUND	Left	68	1	68	0	68	68	10	82	1	82	0	82	1	82	0	82	1	82
	Left-Through		0							0				0				0	
	Through	493	1	322	3	496	325	31	554	1	365	3	557	1	368	0	557	1	368
	Through-Right		1							1				1				1	
	Right	150	0	150	3	153	153	16	175	0	175	3	178	0	178	0	178	0	178
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
EASTBOUND	Left	178	1	178	-1	177	177	21	210	1	210	-1	209	1	209	0	209	1	209
	Left-Through		0							0				0				0	
	Through	71	0	105	0	71	105	0	75	0	111	0	75	0	111	0	75	0	111
	Through-Right		1							1				1				1	
	Right	34	0	0	0	34	0	0	36	0	0	0	36	0	0	0	36	0	0
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
WESTBOUND	Left	26	1	26	0	26	26	3	31	1	31	0	31	1	31	0	31	1	31
	Left-Through		0							0				0				0	
	Through	86	1	86	0	86	86	0	91	1	91	0	91	1	91	0	91	1	91
	Through-Right		1							1				1				1	
	Right	140	0	106	0	140	106	14	163	0	122	0	163	0	122	0	163	0	122
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
CRITICAL VOLUMES		North-South: 357			North-South: 360			North-South: 402				North-South: 405				North-South: 405			
		East-West: 284			East-West: 283			East-West: 332				East-West: 331				East-West: 331			
		SUM: 641			SUM: 643			SUM: 734				SUM: 736				SUM: 736			
VOLUME/CAPACITY (V/C) RATIO:		0.450			0.451			0.515				0.516				0.516			
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.350			0.351			0.415				0.416				0.416			
LEVEL OF SERVICE (LOS):		A			A			A				A				A			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A



Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:			Grand Avenue			Year of Count:			2018			Ambient Growth: (%)			1			Conducted by:			GTC			Date:			August 2021		
6		East-West Street:			Adams Boulevard			Projection Year:			2024			Peak Hour:			AM			Reviewed by:						Project:			806 W Adams		
No. of Phases					2			2					2					2					2								
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?					0			0					0					0					0								
Right Turns: FREE-1, NRTOR-2 or OLA-3?					NB-- 0 SB-- 0			NB-- 0 SB-- 0					NB-- 0 SB-- 0					NB-- 0 SB-- 0					NB-- 0 SB-- 0								
ATSAC-1 or ATSAC+ATCS-2?					EB-- 0 WB-- 0			EB-- 0 WB-- 0					EB-- 0 WB-- 0					EB-- 0 WB-- 0					EB-- 0 WB-- 0								
Override Capacity					2			2					2					2					2								
					0			0					0					0					0								
MOVEMENT					EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION												
					Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume									
NORTHBOUND	Left	98	1	98	0	98	98	0	104	1	104	0	104	1	104	0	104	1	104												
	Left-Through		0							0				0				0													
	Through	550	1	302	0	550	302	29	613	1	335	0	613	1	335	0	613	1	335												
	Through-Right		1							1				1				1													
	Right	53	0	53	0	53	53	0	56	0	56	0	56	0	56	0	56	0	56												
	Left-Through-Right		0							0				0				0													
	Left-Right		0							0				0				0													
SOUTHBOUND	Left	70	1	70	0	70	70	64	138	1	138	0	138	1	138	0	138	1	138												
	Left-Through		0							0				0				0													
	Through	300	1	177	0	300	177	518	836	1	542	0	836	1	542	0	836	1	542												
	Through-Right		1							1				1				1													
	Right	53	0	53	0	53	53	191	247	0	247	0	247	0	247	0	247	0	247												
	Left-Through-Right		0							0				0				0													
	Left-Right		0							0				0				0													
EASTBOUND	Left	99	1	99	0	99	99	86	191	1	191	0	191	1	191	0	191	1	191												
	Left-Through		0							0				0				0													
	Through	554	1	317	1	555	317	301	889	1	487	1	890	1	487	0	890	1	487												
	Through-Right		1							1				1				1													
	Right	79	0	79	0	79	79	0	84	0	84	0	84	0	84	0	84	0	84												
	Left-Through-Right		0							0				0				0													
	Left-Right		0							0				0				0													
WESTBOUND	Left	66	1	66	0	66	66	0	70	1	70	0	70	1	70	0	70	1	70												
	Left-Through		0							0				0				0													
	Through	581	1	339	0	581	339	47	664	1	398	0	664	1	398	0	664	1	398												
	Through-Right		1							1				1				1													
	Right	96	0	96	0	96	96	29	131	0	131	0	131	0	131	0	131	0	131												
	Left-Through-Right		0							0				0				0													
	Left-Right		0							0				0				0													
CRITICAL VOLUMES					North-South: 372			North-South: 372			North-South: 646				North-South: 646				North-South: 646												
					East-West: 438			East-West: 438			East-West: 589				East-West: 589				East-West: 589												
					SUM: 810			SUM: 810			SUM: 1235				SUM: 1235				SUM: 1235												
VOLUME/CAPACITY (V/C) RATIO:					0.540			0.540			0.823				0.823				0.823												
V/C LESS ATSAC/ATCS ADJUSTMENT:					0.440			0.440			0.723				0.723				0.723												
LEVEL OF SERVICE (LOS):					A			A			C				C				C												

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.000	Δv/c after mitigation:	0.000
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street: Vermont Avenue			Year of Count: 2018			Ambient Growth: (%) 1				Conducted by:		GTC		Date: August 2021			
1		East-West Street: Adams Boulevard			Projection Year: 2024			Peak Hour: PM				Reviewed by:				Project: 806 W Adams			
No. of Phases		4			4			4				4		4					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0			0			0				0		0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 3 SB-- 0			NB-- 3 SB-- 0			NB-- 3 SB-- 0				NB-- 3 SB-- 0		NB-- 3 SB-- 0					
ATSAC-1 or ATSAC+ATCS-2?		EB-- 0 WB-- 0			EB-- 0 WB-- 0			EB-- 0 WB-- 0				EB-- 0 WB-- 0		EB-- 0 WB-- 0					
Override Capacity		2			2			2				2		2					
		0			0			0				0		0					
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	85	1	85	0	85	85	39	129	1	129	0	129	1	129	0	129	1	129
	Left-Through		0							0				0				0	
	Through	943	2	472	0	943	472	111	1112	2	556	0	1112	2	556	0	1112	2	556
	Through-Right		0							0				0				0	
	Right	169	1	35	2	171	36	15	194	1	34	2	196	1	35	0	196	1	35
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
SOUTHBOUND	Left	171	1	171	2	173	173	7	189	1	189	2	191	1	191	0	191	1	191
	Left-Through		0							0				0				0	
	Through	941	1	504	0	941	504	315	1314	1	693	0	1314	1	693	0	1314	1	693
	Through-Right		1							1				1				1	
	Right	67	0	67	0	67	67	1	72	0	72	0	72	0	72	0	72	0	72
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
EASTBOUND	Left	134	1	134	0	134	134	1	143	1	143	0	143	1	143	0	143	1	143
	Left-Through		0							0				0				0	
	Through	845	1	462	1	846	463	103	1000	1	566	1	1001	1	566	0	1001	1	566
	Through-Right		1							1				1				1	
	Right	79	0	79	0	79	79	47	131	0	131	0	131	0	131	0	131	0	131
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
WESTBOUND	Left	134	1	134	1	135	135	18	160	1	160	1	161	1	161	0	161	1	161
	Left-Through		0							0				0				0	
	Through	713	1	437	1	714	438	82	839	1	509	1	840	1	510	0	840	1	510
	Through-Right		1							1				1				1	
	Right	160	0	160	1	161	161	9	179	0	179	1	180	0	180	0	180	0	180
	Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0		
CRITICAL VOLUMES		North-South: 643			North-South: 645			North-South: 822				North-South: 822				North-South: 822			
		East-West: 596			East-West: 598			East-West: 726				East-West: 727				East-West: 727			
		SUM: 1239			SUM: 1243			SUM: 1548				SUM: 1549				SUM: 1549			
VOLUME/CAPACITY (V/C) RATIO:		0.901			0.904			1.126				1.127				1.127			
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.801			0.804			1.026				1.027				1.027			
LEVEL OF SERVICE (LOS):		D			D			F				F				F			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:		Hoover Street		Year of Count:		2018		Ambient Growth: (%)		1		Conducted by:		GTC		Date:		August 2021	
		East-West Street:		23rd Street		Projection Year:		2024		Peak Hour:		PM		Reviewed by:				Project:		806 W Adams	
		No. of Phases		2				2				2				2				2	
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0				0				0				0				0	
		Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0		NB-- 0 SB-- 0	
		ATSAC-1 or ATSAC+ATCS-2?		EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0		EB-- 0 WB-- 0	
		Override Capacity		2				2				2				2				2	
				0				0				0				0				0	
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION					
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume		
NORTHBOUND	Left	34	1	34	0	34	34	0	36	1	36	0	36	1	36	0	36	1	36		
	Left-Through		0							0				0				0			
	Through	1157	2	579	7	1164	582	74	1302	2	651	7	1309	2	655	0	1309	2	655		
	Through-Right		0							0				0				0			
	Right	11	1	11	0	11	11	0	12	1	12	0	12	1	12	0	12	1	12		
	Left-Through-Right		0							0				0				0			
SOUTHBOUND	Left		0							0				0				0			
	Left-Through	123	1	123	0	123	123	0	131	1	131	0	131	1	131	0	131	1	131		
	Through	924	1	477	9	933	481	89	1070	1	551	9	1079	1	555	0	1079	1	555		
	Through-Right		1							1				1				1			
	Right	29	0	29	0	29	29	0	31	0	31	0	31	0	31	0	31	0	31		
	Left-Through-Right		0							0				0				0			
EASTBOUND	Left		0							0				0				0			
	Left-Through	93	0	93	0	93	93	0	99	0	99	0	99	0	99	0	99	0	99		
	Through	138	0	265	0	138	265	0	146	0	281	0	146	0	281	0	146	0	281		
	Through-Right		0							0				0				0			
	Right	34	0	0	0	34	0	0	36	0	0	0	36	0	0	0	36	0	0		
	Left-Through-Right		1							1				1				1			
WESTBOUND	Left		0							0				0				0			
	Left-Through	31	0	31	0	31	31	0	33	0	33	0	33	0	33	0	33	0	33		
	Through	111	0	295	0	111	295	0	118	0	313	0	118	0	313	0	118	0	313		
	Through-Right		0							0				0				0			
	Right	153	0	0	0	153	0	0	162	0	0	0	162	0	0	0	162	0	0		
	Left-Through-Right		1							1				1				1			
CRITICAL VOLUMES	Left-Right		0							0				0				0			
	North-South:		702		North-South:	705		North-South:	782		786		North-South:	786		North-South:	786		786		
	East-West:		388		East-West:	388		East-West:	412		412		East-West:	412		East-West:	412		412		
		SUM:	1090		SUM:	1093		SUM:	1194		1198		SUM:	1198		SUM:	1198		1198		
VOLUME/CAPACITY (V/C) RATIO:				0.727			0.729				0.796				0.799				0.799		
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.627			0.629				0.696				0.699				0.699		
LEVEL OF SERVICE (LOS):				B			B				B				B				B		

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.003	Δv/c after mitigation:	0.003
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:			Hoover Street			Year of Count:			2018		Ambient Growth: (%)			1		Conducted by:		GTC		Date:		August 2021	
3		East-West Street:			Adams Boulevard			Projection Year:			2024		Peak Hour:			PM		Reviewed by:				Project:		806 W Adams	
No. of Phases					4			4			4			4			4			4					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?					0			0			0			0			0			0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?					0			0			0			0			0			0					
ATSAC-1 or ATSAC+ATCS-2?					3			3			3			3			3			3					
Override Capacity					2			2			2			2			2			2					
					0			0			0			0			0			0					
MOVEMENT					EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION						
					Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume			
NORTHBOUND	Left	183	1	183	0	183	183	2	196	1	196	0	196	1	196	0	196	1	196	0	196	1	196		
	Left-Through		0							0				0				0			0				
	Through	916	2	458	0	916	458	31	1003	2	502	0	1003	2	502	0	1003	2	502	0	1003	2	502		
	Through-Right		0							0				0				0			0				
	Right	49	1	9	17	66	19	0	52	1	9	17	69	1	19	0	69	1	19	0	69	1	19		
	Left-Through-Right		0							0				0				0			0				
Left-Right		0								0				0				0			0				
SOUTHBOUND	Left	159	1	159	9	168	168	27	196	1	196	9	205	1	205	0	205	1	205	0	205	1	205		
	Left-Through		0							0				0				0			0				
	Through	786	2	393	0	786	393	41	875	2	438	0	875	2	438	0	875	2	438	0	875	2	438		
	Through-Right		0							0				0				0			0				
	Right	145	1	14	0	145	14	21	175	1	26	0	175	1	26	0	175	1	26	0	175	1	26		
	Left-Through-Right		0							0				0				0			0				
Left-Right		0							0				0				0			0					
EASTBOUND	Left	263	1	263	0	263	263	19	298	1	298	0	298	1	298	0	298	1	298	0	298	1	298		
	Left-Through		0							0				0				0			0				
	Through	624	2	312	4	628	314	102	764	2	382	4	768	2	384	0	768	2	384	0	768	2	384		
	Through-Right		0							0				0				0			0				
	Right	227	1	136	0	227	136	2	243	1	145	0	243	1	145	0	243	1	145	0	243	1	145		
	Left-Through-Right		0							0				0				0			0				
Left-Right		0							0				0				0			0					
WESTBOUND	Left	81	1	81	14	95	95	0	86	1	86	14	100	1	100	0	100	1	100	0	100	1	100		
	Left-Through		0							0				0				0			0				
	Through	692	2	346	4	696	348	74	809	2	405	4	813	2	407	0	813	2	407	0	813	2	407		
	Through-Right		0							0				0				0			0				
	Right	336	1	177	7	343	175	24	381	1	185	7	388	1	183	0	388	1	183	0	388	1	183		
	Left-Through-Right		0							0				0				0			0				
Left-Right		0							0				0				0			0					
CRITICAL VOLUMES					North-South: 617 East-West: 609 SUM: 1226			North-South: 626 East-West: 611 SUM: 1237			North-South: 698 East-West: 703 SUM: 1401			North-South: 707 East-West: 705 SUM: 1412			North-South: 707 East-West: 705 SUM: 1412								
VOLUME/CAPACITY (V/C) RATIO:					0.892			0.900			1.019			1.027			1.027								
V/C LESS ATSAC/ATCS ADJUSTMENT:					0.792			0.800			0.919			0.927			0.927								
LEVEL OF SERVICE (LOS):					C			C			E			E			E								

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:		Hoover Street		Year of Count:		2018		Ambient Growth: (%)		1		Conducted by:		GTC		Date:		August 2021	
		East-West Street:		30th Street		Projection Year:		2024		Peak Hour:		PM		Reviewed by:				Project:		806 W Adams	
		No. of Phases		3				3				3				3				3	
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0				0				0				0				0	
		Right Turns: FREE-1, NRTOR-2 or OLA-3?		0				0				0				0				0	
		ATSAC-1 or ATSAC+ATCS-2?		2				2				2				2				2	
		Override Capacity		0				0				0				0				0	
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION					
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume		
NORTHBOUND	Left	71	1	71	0	71	71	0	75	1	75	0	75	1	75	0	75	1	75		
	Left-Through		0							0				0				0			
	Through	656	2	328	9	665	333	18	714	2	357	9	723	2	362	0	723	2	362		
	Through-Right		0							0				0				0			
	Right	26	1	10	0	26	10	4	32	1	14	0	32	1	14	0	32	1	14		
	Left-Through-Right		0							0				0				0			
SOUTHBOUND	Left	232	1	232	0	232	232	11	257	1	257	0	257	1	257	0	257	1	257		
	Left-Through		0							0				0				0			
	Through	676	1	435	7	683	442	25	743	1	483	7	750	1	490	0	750	1	490		
	Through-Right		1							1				1				1			
	Right	194	0	194	7	201	201	17	223	0	223	7	230	0	230	0	230	0	230		
	Left-Through-Right		0							0				0				0			
EASTBOUND	Left	192	1	192	9	201	201	14	218	1	218	9	227	1	227	0	227	1	227		
	Left-Through		0							0				0				0			
	Through	99	0	139	0	99	139	0	105	0	147	0	105	0	147	0	105	0	147		
	Through-Right		1							1				1				1			
	Right	40	0	0	0	40	0	0	42	0	0	0	42	0	0	0	42	0	0		
	Left-Through-Right		0							0				0				0			
WESTBOUND	Left	32	1	32	0	32	32	3	37	1	37	0	37	1	37	0	37	1	37		
	Left-Through		0							0				0				0			
	Through	146	1	132	0	146	132	0	155	1	145	0	155	1	145	0	155	1	145		
	Through-Right		1							1				1				1			
	Right	118	0	118	0	118	118	9	134	0	134	0	134	0	134	0	134	0	134		
	Left-Through-Right		0							0				0				0			
CRITICAL VOLUMES		North-South:		560		North-South:		565		North-South:		614		North-South:		619		North-South:		619	
		East-West:		324		East-West:		333		East-West:		363		East-West:		372		East-West:		372	
		SUM:		884		SUM:		898		SUM:		977		SUM:		991		SUM:		991	
VOLUME/CAPACITY (V/C) RATIO:				0.620				0.630				0.686				0.695				0.695	
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.520				0.530				0.586				0.595				0.595	
LEVEL OF SERVICE (LOS):				A				A				A				A				A	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.009	Δv/c after mitigation:	0.009
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:		North-South Street:		Figueroa Street		Year of Count:		2018		Ambient Growth: (%)		1		Conducted by:		GTC		Date:		August 2021	
		East-West Street:		Adams Boulevard		Projection Year:		2024		Peak Hour:		PM		Reviewed by:				Project:		806 W Adams	
		No. of Phases				4				4				4						4	
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				0				0				0						0	
		Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		NB-- 0 SB-- 0		0		0	
		ATSAC-1 or ATSAC+ATCS-2?		EB-- 0 WB-- 3		3		EB-- 0 WB-- 3		3		EB-- 0 WB-- 3		3		EB-- 0 WB-- 3		3		3	
		Override Capacity				2				2				2				2		2	
						0				0				0				0		0	
MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION					
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume		
NORTHBOUND	Left	229	1	229	4	233	233	4	247	1	247	4	251	1	251	0	251	1	251		
	Left-Through		0							0				0				0			
	Through	981	2	491	0	981	491	407	1448	2	724	0	1448	2	724	0	1448	2	724		
	Through-Right		0							0				0				0			
	Right	47	1	9	0	47	9	109	159	1	61	0	159	1	61	0	159	1	61		
	Left-Through-Right		0							0				0				0			
SOUTHBOUND	Left		0							0				0				0			
	Left-Through	159	1	159	0	159	159	77	246	1	246	0	246	1	246	0	246	1	246		
	Through	840	1	476	0	840	478	537	1429	1	777	0	1429	1	779	0	1429	1	779		
	Through-Right		1							1				1				1			
	Right	111	0	111	4	115	115	6	124	0	124	4	128	0	128	0	128	0	128		
	Left-Through-Right		0							0				0				0			
EASTBOUND	Left		0							0				0				0			
	Left-Through	106	1	106	4	110	110	7	120	1	120	4	124	1	124	0	124	1	124		
	Through	539	1	330	4	543	334	102	674	1	403	4	678	1	407	0	678	1	407		
	Through-Right		1							1				1				1			
	Right	121	0	121	4	125	125	4	132	0	132	4	136	0	136	0	136	0	136		
	Left-Through-Right		0							0				0				0			
WESTBOUND	Left		0							0				0				0			
	Left-Through	76	1	76	0	76	76	116	197	1	197	0	197	1	197	0	197	1	197		
	Through	799	2	400	4	803	402	68	916	2	458	4	920	2	460	0	920	2	460		
	Through-Right		0							0				0				0			
	Right	198	1	39	0	198	39	49	259	1	13	0	259	1	13	0	259	1	13		
	Left-Through-Right		0							0				0				0			
		CRITICAL VOLUMES		North-South: 705 East-West: 506 SUM: 1211		North-South: 711 East-West: 512 SUM: 1223		North-South: 1024 East-West: 600 SUM: 1624		North-South: 1030 East-West: 604 SUM: 1634		North-South: 1030 East-West: 604 SUM: 1634									
		VOLUME/CAPACITY (V/C) RATIO:		0.881		0.889		1.181		1.188		1.188									
		V/C LESS ATSAC/ATCS ADJUSTMENT:		0.781		0.789		1.081		1.088		1.088									
		LEVEL OF SERVICE (LOS):		C		C		F		F		F									

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.007	Δv/c after mitigation:	0.007
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet (Circular 212 Method)



I/S #:	North-South Street:	Grand Avenue	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	GTC	Date:	August 2021										
6	East-West Street:	Adams Boulevard	Projection Year:	2024	Peak Hour:	PM	Reviewed by:		Project:	806 W Adams										
No. of Phases Opposed Ø'ing: N/S-1, E/W-2 or Both-3? Right Turns: FREE-1, NRTOR-2 or OLA-3? ATSAC-1 or ATSAC+ATCS-2? Override Capacity			NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0		NB-- 0 SB-- 0 EB-- 0 WB-- 0											
			2		2		2		2											
			0		0		0		0											
			0		0		0		0											
			0		0		0		0											
			2		2		2		2											
			0		0		0		0											
MOVEMENT			EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT			FUTURE CONDITION W/ PROJECT			FUTURE W/ PROJECT W/ MITIGATION					
			Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	103	1	103	0	103	103	0	109	1	109	0	109	1	109	0	109	1	109	
	Left-Through		0							0				0				0		
	Through	575	1	326	0	575	326	77	687	1	385	0	687	1	385	0	687	1	385	
	Through-Right		1							1				1				1		
	Right	77	0	77	0	77	77	0	82	0	82	0	82	0	82	0	82	0	82	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
SOUTHBOUND	Left	116	1	116	0	116	116	49	172	1	172	0	172	1	172	0	172	1	172	
	Left-Through		0							0				0				0		
	Through	477	1	279	0	477	280	646	1152	1	693	0	1152	1	694	0	1152	1	694	
	Through-Right		1							1				1				1		
	Right	80	0	80	2	82	82	148	233	0	233	2	235	0	235	0	235	0	235	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
EASTBOUND	Left	116	1	116	0	116	116	232	355	1	355	0	355	1	355	0	355	1	355	
	Left-Through		0							0				0				0		
	Through	603	1	335	2	605	336	302	942	1	506	2	944	1	507	0	944	1	507	
	Through-Right		1							1				1				1		
	Right	66	0	66	0	66	66	0	70	0	70	0	70	0	70	0	70	0	70	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
WESTBOUND	Left	66	1	66	0	66	66	0	70	1	70	0	70	1	70	0	70	1	70	
	Left-Through		0							0				0				0		
	Through	433	1	243	0	433	243	49	509	1	321	0	509	1	321	0	509	1	321	
	Through-Right		1							1				1				1		
	Right	53	0	53	0	53	53	77	133	0	133	0	133	0	133	0	133	0	133	
	Left-Through-Right		0							0				0				0		
	Left-Right		0							0				0				0		
CRITICAL VOLUMES			North-South: 442	East-West: 401	SUM: 843	North-South: 442	East-West: 402	SUM: 844	North-South: 802	East-West: 676	SUM: 1478	North-South: 803	East-West: 676	SUM: 1479	North-South: 803	East-West: 676	SUM: 1479			
VOLUME/CAPACITY (V/C) RATIO:			0.562		0.563		0.985		0.986		0.986		0.986							
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.462		0.463		0.885		0.886		0.886		0.886							
LEVEL OF SERVICE (LOS):			A		A		D		D		D		D							

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project:	0.001	Δv/c after mitigation:	0.001
Significant impacted?	NO	Fully mitigated?	N/A

Attachment B

VMT Output

TABLE 1
VMT ANALYSIS SUMMARY

<i>Project Information</i>	
<u>Land Use</u>	<u>Size</u>
Housing Apartments [a]	102 dwelling units (506 bedrooms)
<i>Project Analysis</i> [b]	
Project Area Planning Commission	South Los Angeles
Travel Behavior Zone	Compact Infill
Maximum Allowable VMT Reduction	40%
<i>VMT Analysis</i> [c]	Proposed Project
Daily Vehicle Trips	2,475
Daily VMT	14,921
Household VMT per Capita [d]	5.6
Impact Threshold	6.0
Significant Impact	NO
Work VMT per Employee [e]	N/A
Impact Threshold	11.6
Significant Impact	N/A

Notes

[a] The Project proposes to construct 102 dwelling units consisting of 506 bedrooms. For conservative purposes, 506 dwelling units was used in the VMT calculation in this analysis.

[b] Project Analysis based on the *City of Los Angeles VMT Calculator Version 1.3* (July 2020).

[c] No Project design features or mitigation measures were included.

[d] Based on home-based production trips only (see Appendix D, Report 4).

[e] Based on home-based work attraction trips only (see Appendix D, Report 4).

**TABLE 2
PROJECT TRIP GENERATION ESTIMATES**

TRIP GENERATION RATES [a]									
Land Use	ITE Land Use	Rate	Daily	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
Clinic	630	per employee	9.25	77%	23%	1.12	36%	64%	0.85
Off Campus Student Housing	225	per bedroom	3.15	41%	59%	0.12	50%	50%	0.25
Day Care Center	565	per student	4.09	53%	47%	0.78	47%	53%	0.79
TRIP GENERATION ESTIMATES									
Land Use	ITE Land Use	Size	Daily	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
<u>Existing to be Removed</u>									
Clinic	630	20 Employees	185	17	5	22	6	11	17
Transit/Walk-In Adjustment - 10% [b]			-19	-2	0	-2	-1	-1	-2
Day Care Center			123	12	11	23	11	13	24
Transit/Walk-In Adjustment - 10% [b]	565	30 Students	-12	-1	-1	-2	-1	-1	-2
			277	26	15	41	15	22	37
<u>Proposed Project</u>									
Off Campus Student Housing	225	506 Bedrooms	1,594	25	36	61	64	63	127
Transit/Walk-In Adjustment - 10% [b]			-159	-3	-4	-6	-6	-6	-13
Total Proposed Project Trips			1,435	22	32	55	58	57	114
TOTAL - NET NEW PROJECT TRIPS			1,158	(4)	17	14	43	35	77

[a] Source: *Trip Generation, 10th Edition*, Institute of Transportation Engineers, 2017.

[b] Per LADOT's *Transportation Impact Study Guidelines* (December 2016), the Project Site is located within 0.25 miles walking distance from a transit station or RapidBus stop, a conservative transit reduction is applied to account for transit usage and walking visitor arrivals from the surrounding neighborhoods and adjacent commercial developments

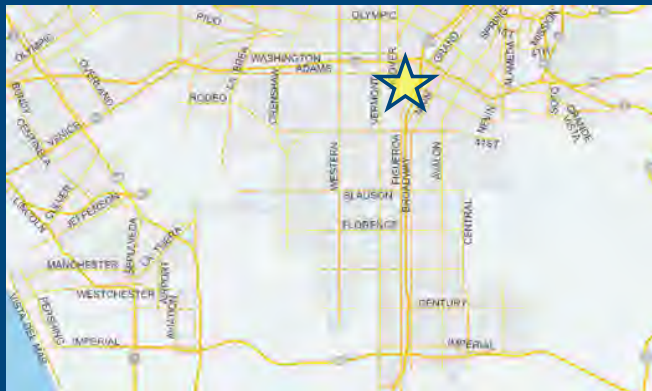
CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



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

Project Information

Project: 806 W Adams Student Housing
 Scenario: (Address located at coordinates below) [www](#)
 Address: 34.02951721384881, -118.28026403591666 [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: Housing | Single Family Value: Unit: 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: Housing | Multi-Family Value: 506 Unit: DU [+](#)
 Housing | Multi-Family 506 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	2,475 Daily Vehicle Trips
0 Daily VMT	14,921 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. ☐

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips 2,475
Net Daily Trips

The net increase in daily VMT ≤ 0 14,921
Net Daily VMT

The proposed project consists of only retail land uses ≤ 50,000 square feet total. 0.000
ksf

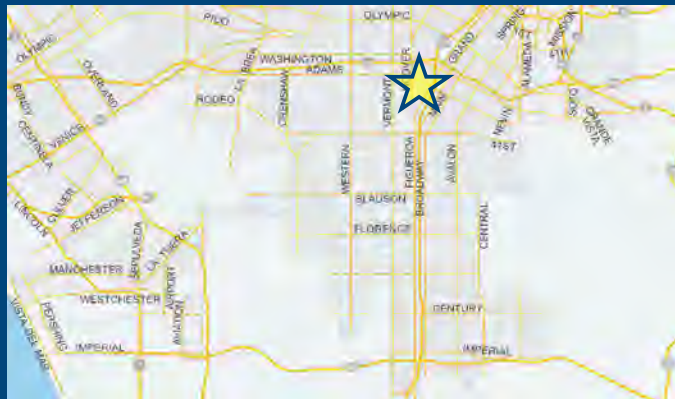
The proposed project is required to perform VMT analysis.

CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



Project Information

Project: 806 W Adams Student Housing
Scenario: (Address located at coordinates below)
Address: 34.02951721384881, -118.28026403591666



Proposed Project Land Use Type	Value	Unit
Housing Multi-Family	506	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? Proposed Project: No With Mitigation: No
Max Work Based TDM Achieved? Proposed Project: No With Mitigation: No

A
Parking

☐ Proposed Prj ☐ Mitigation

Reduce Parking Supply

city code parking provision for the project site
 actual parking provision for the project site

☐ Proposed Prj ☐ Mitigation

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)
 percent of employees subject to priced parking

☐ Proposed Prj ☐ Mitigation

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
2,475 Daily Vehicle Trips	2,475 Daily Vehicle Trips
14,921 Daily VMT	14,921 Daily VMT
5.6 Household VMT per Capita	5.6 Household VMT per Capita
N/A Work VMT per Employee	N/A Work VMT per Employee

Significant VMT Impact?	
Household: No Threshold = 6.0 15% Below APC	Household: No Threshold = 6.0 15% Below APC
Work: N/A Threshold = 11.6 15% Below APC	Work: N/A Threshold = 11.6 15% Below APC



CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359: Version 1.3



Project Information			
Land Use Type		Value	Units
Housing	Single Family	0	DU
	Multi Family	506	DU
	Townhouse	0	DU
	Hotel	0	Rooms
	Motel	0	Rooms
Affordable Housing	Family	0	DU
	Senior	0	DU
	Special Needs	0	DU
	Permanent Supportive	0	DU
Retail	General Retail	0.000	ksf
	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
Office	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

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359: Version 1.3



Analysis Results			
Total Employees: 0			
Total Population: 1,140			
Proposed Project		With Mitigation	
2,475	Daily Vehicle Trips	2,475	Daily Vehicle Trips
14,921	Daily VMT	14,921	Daily VMT
5.6	Household VMT per Capita	5.6	Household VMT per Capita
N/A	Work VMT per Employee	N/A	Work VMT per Employee
Significant VMT Impact?			
APC: South Los Angeles			
Impact Threshold: 15% Below APC Average			
Household = 6.0			
Work = 11.6			
Proposed Project		With Mitigation	
VMT Threshold	Impact	VMT Threshold	Impact
Household > 6.0	No	Household > 6.0	No
Work > 11.6	N/A	Work > 11.6	N/A

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359:



Version 1.3

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

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359



Version 1.3

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

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359



Version 1.3

TDM Strategy Inputs, Cont.				
Strategy Type		Description	Proposed Project	Mitigations
Commute Trip Reductions	Required commute trip reduction program	Employees participating (%)	0%	0%
	Alternative Work Schedules and Telecommute	Employees participating (%)	0%	0%
		Type of program	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)				

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.2802640359:



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)	0	0
	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

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.28026403591666



Version 1.3

TDM Adjustments by Trip Purpose & Strategy

Place type: Compact Infill

		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	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	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%	

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: August 24, 2021

Project Name: 806 W Adams Student Housing

Project Scenario: (Address located at coordinates below)

Project Address: 34.02951721384881, -118.28026403591666



Version 1.3

TDM Adjustments by Trip Purpose & Strategy, Cont.

Place type: Compact Infill

		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	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	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		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
MAX. TDM EFFECT		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

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

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.

CITY OF LOS ANGELES VMT CALCULATOR

Report 4: MXD Methodology

Date: August 24, 2021

Project Name: 806 W Adams Student Housing
Project Scenario: (Address located at coordinates below)
Project Address: 34.02951721384881, -118.28026403591



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	454	-17.2%	376	7.0	3,178	2,632
Home Based Other Production	1,256	-26.2%	927	4.0	5,024	3,708
Non-Home Based Other Production	586	-2.9%	569	7.3	4,278	4,154
Home-Based Work Attraction	0	0.0%	0	12.6	0	0
Home-Based Other Attraction	598	-22.1%	466	7.0	4,186	3,262
Non-Home Based Other Attraction	142	-3.5%	137	8.5	1,207	1,165

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	0.0%	376	2,632	0.0%	376	2,632
Home Based Other Production	0.0%	927	3,708	0.0%	927	3,708
Non-Home Based Other Production	0.0%	569	4,154	0.0%	569	4,154
Home-Based Work Attraction	0.0%	0	0	0.0%	0	0
Home-Based Other Attraction	0.0%	466	3,262	0.0%	466	3,262
Non-Home Based Other Attraction	0.0%	137	1,165	0.0%	137	1,165

MXD VMT Methodology Per Capita & Per Employee

Total Population: 1,140

Total Employees: 0

APC: South Los Angeles

	Proposed Project	Project with Mitigation Measures
Total Home Based Production VMT	6,340	6,340
Total Home Based Work Attraction VMT	0	0
Total Home Based VMT Per Capita	5.6	5.6
Total Work Based VMT Per Employee	N/A	N/A