HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

August 9, 2023

Mr. Walter Marks
Walter N. Marks, Inc.
Helms Hall of Fame
8758 Venice Boulevard, Suite 100
Los Angeles, California 90034

RE: Vehicle Miles Traveled ("VMT") and Trip Generation Updates Related to Modifications to Residential Component of Proposed Mixed-Use Project at 688 S. Cochran Avenue in the Miracle Mile Community of the City of Los Angeles

Dear Mr. Marks,

Pursuant to your request, this document summarizes our evaluations of the potential effects of a minor change to the residential component of the proposed Mirabel mixed-use project located at 688 S. Cochran Avenue in the Miracle Mile community of the City of Los Angeles. As you know, a traffic impact assessment ("TIA") was prepared in May of 2022 for the then-proposed project, which involved the demolition/rehabilitation of several existing structures on the project site, and the construction of a new mixed-use development containing a total of 348 residential units (including 29 required "very low income" and nine additional voluntary "moderate income" units) along with a total of approximately 12,821 square feet of "commercial" floor area, which itself consisted of about 7,378 square feet of retail uses, about 4,443 square feet of restaurant space, and an approximately 1,000 square foot cafe. That study, which is incorporated herein in its entirety by reference, concluded that the project was consistent with all applicable City plans, programs, and policies related to providing and maintaining a sustainable transportation network, and would not result in any significant VMT impacts or other undesirable traffic-related effects under the City's adopted (CEQA-compliant) analysis standards. The TIA was reviewed by the City of Los Angeles Department of Transportation ("LADOT") and approved on May 23, 2022 (via email modification of LADOT's December 20, 2021 and August 10, 2020 approval letters for TIA's for earlier versions of the subject project); the final LADOT TIA approval memorandum for the project description noted above is also incorporated into this report in its entirety by reference.

However, a minor revision is being proposed for the residential component of the subject project that would convert the nine "moderate income" units (provided voluntarily) to "market-rate" units, increasing that component from 310 to 319 units while retaining the 29 "very low income" units; no changes to the project's "commercial" components, vehicular or bicycle parking requirements or proposed supply, or site vehicular access (driveway) locations or operations are anticipated. As a result of the proposed changes in the project description from that approved by LADOT, the City's Planning Department has requested that the VMT and trip generation calculations for the

project be updated to reflect the current development proposal. In order to evaluate the effects of these project description changes on the results of the May 2022 study, the new (proposed) project information was input into LADOT's VMT Calculator program, with the results compared to those from the earlier analyses. Additionally, the project's vehicular trip generation estimates were also updated based on the proposed new description. Both procedures used the same or similar assumptions and analysis methodologies to those detailed in the project's May 2022 TIA, although it should be noted that both the VMT Calculator and the vehicular trip generation rates used in the earlier study have themselves been updated since the "original" project was analyzed.

Specifically, LADOT has released Version 1.4 of its VMT Calculator program, which supersedes all previous iterations (including Version 1.3 used in the May 2022 study) and is now required for all new VMT-related evaluations. Similarly, the Institute of Transportation Engineers' ("ITE") *Trip Generation* manual, from which the majority of the vehicular trip generation rates utilized in the earlier study were obtained (with the exception of the project's "affordable" residential units, which were based on information provided in the LADOT TAG, and the empirical trip data used for the existing Staples retail store occupying the project site), has also been updated, with the current data provided in the 11th Edition of that publication (superseding the 10th Edition data used in the May 2022 study). Note also that the 11th Edition of the ITE *Trip Generation* manual also identifies several new "retail" land use categories, including "Strip Retail Plaza (LU 822)", which is specifically applicable to development projects containing less than 40,000 square feet of retail floor area, which is considered to be more appropriate for the proposed project than the more general "Shopping Center (LU 820)" rates recommended by LADOT during the scoping for the May 2022 study. Additionally, the 11th Edition of the *Trip Generation* manual also identifies a new "Multifamily Housing (High-Rise) (LU 222)" "residential" land use category, which provides trip generation data specifically for residential developments proximate to rail transit stations (such as the proposed project, which is less than 600 feet west of the Metro "D" Line rail station currently under construction on the northwest corner of the intersection of Wilshire Boulevard and La Brea Avenue). Therefore, the trip generation calculations for the revised project were based on the 11th Edition *Trip Generation* data. Note, however, that the "transit use" assumptions used in the May 2022 study for the project's "market-rate" residential units were modified due to the use of the new "close to rail transit" trip generation rate. The May 2022 analyses assumed a total 20-percent transit usage factor for the "market-rate" units to account for the anticipated use of the site-serving Metro RapidBus 720 (15 percent) and "D" Line (five percent) services; since the new residential trip generation rate intrinsically considers the effects of rail transit use on the project's "market-rate" residential trips, the originally-assumed five percent "D" Line transit use factor was eliminated, although the 15 percent bus transit utilization factor was retained.

The results of the updated VMT and trip generation analyses for the revised project description are discussed in detail in the following pages of this report, with all supporting calculations and other information provided in the attachments to this document. However, to briefly summarize

the conclusions of the updated analyses, as with the project evaluated in the May 2022 study, the revised project is not expected to result in any significant VMT-related impacts. In fact, the revised project would exhibit lower VMT levels than the "original" project (10,368 daily VMT vs. 11,234 daily VMT, following the implementation of the project's various trip-reducing measures, which are unchanged from the prior analyses). Further, due to the reduction in daily VMT levels, the revised project would no longer require the preparation of a detailed VMT impact study.

Additionally, the revised project is anticipated to generate fewer vehicular trips than the project analyzed in the May 2022 study. Based on the 11th Edition ITE *Trip Generation* manual data, the revised project is estimated to result in a net reduction in site-related traffic (considering the removal of the trips generated by the existing site uses) of approximately 478 daily vehicle trips, including total reductions of about four net trips during the AM peak hour and about 66 net trips during the PM peak hour. These values represent a reduction of about 167 daily trips, as well as reductions of about 13 total trips and six total trips during the AM and PM peak hours, respectively, when compared to the amount of net vehicular traffic generated by the "original" project.

Finally, while no specific evaluations were conducted regarding the revised project's consistency with City policies related to providing a sustainable transportation network, the proposed changes to the prior project are minimal, and would not affect the conclusions of the May 2022 study that the project is compatible with or will not preclude the implementation of any such programs.

Therefore, based on the results of this evaluation, it can be concluded that the "May 2022" TIA provides a "worst case" assessment of the potential VMT and/or traffic-related impacts of the proposed revised project. Further, since that study did not identify any significant VMT impacts or other undesirable effects on any of the roadways or intersections in the project vicinity, the reduced VMT and vehicle trip generation levels associated with the current project modifications ensure that the original conclusions of the May 2022 study remain valid for the revised project.

The assumptions, analysis methodologies and procedures, VMT and trip generation calculations, and results of the updates to the proposed project's May 2022 TIA, including comparisons to the results of that earlier study, are described in detail in the following pages of this report.

CEQA Vehicle Miles Traveled ("VMT") Analysis Updates

The updates to the proposed project's VMT analyses, which were prepared in order to reflect the project's revised description, were based on the same assumptions and evaluation procedures described in detail in the "California Environmental Quality Act ("CEQA") Analyses" section of the May 2022 study, with the exceptions that LADOT's recently-released version (Version 1.4) of the VMT Calculator program was utilized (superseding the previous Version 1.3 evaluations), and the project's land use characteristics were updated with the currently-proposed information. These updates focused primarily on the effects of the project modifications on the results of the earlier study's Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) evaluations.

Revised Project VMT Analysis "Screening" Evaluation and Results

As with Version 1.3 of the VMT Calculator, Version 1.4 also provides a "screening" page for use in determining whether a project would be required to prepare a detailed VMT impact analysis. As detailed in the May 2022 TIA, the VMT Calculator allows for a number of "project feature" and "mitigation"-related adjustments that can affect both the VMT and trip generation calculations for a proposed project, although for the purposes of screening the project to determine whether a detailed VMT analysis is required, LADOT advises that no such adjustments are permitted.

As described earlier in this report, the project site is currently developed with several buildings housing active businesses, which will be demolished or rehabilitated in order to construct the revised project, which itself is now proposed to contain a total of 348 residential units, including 29 "very low income" units, and approximately 12,821 total square feet of commercial floor area, consisting of about 7,378 square feet of retail uses, about 4,443 square feet of restaurant space, and an approximately 1,000 square foot cafe. Note that, as with the May 2022 VMT analyses, the existing site development exhibits a total of about 800 square feet of vacant retail area, for which no VMT or vehicle trip "credits" were assumed. Based on these assumptions, the results of the VMT analysis "screening" procedure for the revised project are shown in Attachment A.

As identified in the VMT Calculator "screening" evaluations, the revised project is estimated to generate a total of 11,999 daily VMT and a total of 1,943 vehicle trips per day. These values are slightly lower than those associated with the project analyzed in the May 2022 TIA, which exhibited a total daily VMT of 13,001 and a total of 2,096 daily vehicle trips (or 1,002 more daily VMT and 153 more vehicle trips per day than the revised project). However, while these trip reductions are relatively nominal, based on the criteria established by the City pursuant to the requirements of SB 743, the updated VMT "screening" procedures show that the revised project will result in a net increase of 177 daily vehicle trips (compared to a net increase of 330 daily vehicle trips for the "original" project), and as such, would no longer meet the 250 net daily trip increase threshold ("Tier 2 Screening Criteria") for requiring the preparation of a detailed VMT impact assessment.

However, although a comprehensive VMT impact analysis is not required for the revised project, and as such, no significant VMT-related impacts are anticipated, the subject project will continue to incorporate each of the various trip-reducing "TDM Strategies" identified in the May 2022 study (specifically, reduced vehicular parking versus the City's "baseline" Zoning Code requirements, the provision of on-site information kiosks to educate project residents, employees, and customers about the various transportation options available in the vicinity of the project, and the inclusion of at least the minimum number of bicycle parking spaces required by the Zoning Code). Therefore, in order to provide the same level of analyses as that contained in the May 2022 TIA, as well as allow for a reasonable and informed comparison of the "original" and revised projects, this study was expanded to include a detailed VMT impact evaluation for the revised project. The results of this supplemental VMT impact analysis are described in the following pages.

Revised Project VMT Impact Evaluations

As described in detail in the May 2022 TIA, a significant project-related VMT impact is deemed to occur if the subject project generates a "household per capita VMT" (for residential components) or "per employee VMT" (for any commercial uses) exceeding a threshold of 15 percent below the average "per capita" or "per employee" VMT of the Area Planning Commission ("APC") area in which the project is located, although the TAG also identifies that the "commercial" portions of a development project that are comprised of less than 50,000 square feet of restaurant, retail, or other similar small-scale "local-serving" uses are assumed to have less-than-significant impacts. The project is located in the "Central" APC, which exhibits a "Daily Household VMT per Capita" impact threshold of 6.0, and a "Daily Work VMT per Employee" impact threshold of 7.6.

Per LADOT's recommendations, the VMT Calculator was used to determine if the revised project would result in any significant VMT impacts. The procedures for calculating and evaluating the project's potential VMT impacts are similar to and based upon the same land use information as were used for the preceding VMT screening evaluations, but are expanded to consider the effects of any applicable trip and/or VMT-reducing measures contained in the "TDM Strategies" toolbox of the VMT Calculator, either as an integral part of the proposed project itself ("project feature") or as mitigation for any significant VMT-related impacts that may be identified by the analyses.

Specifically, as briefly noted earlier in this report, due to its inclusion of the required number and type (income level) of "affordable" residential units, the project qualifies for and will incorporate reductions from its otherwise-applicable Zoning Code "residential" vehicle parking requirements under the City's Density Bonus Affordable Housing Incentives Program, and is also permitted to reduce its typical "commercial" component vehicular parking requirement through the provision of on-site bicycle parking pursuant to the Zoning Code. As discussed in the May 2022 study, these adjustments reduce the project's total vehicular parking requirement from 589 spaces to about 304 spaces, although the project will provide a total of about 478 vehicle parking spaces. Note that the proposed modifications to the project's residential component do not change either the required or provided number of vehicle parking spaces, and the parking-related assumptions used in the VMT impact analyses for the revised project are unchanged from the May 2022 TIA.

In addition to reduced vehicular parking and the provision of bicycle parking, the TDM Calculator's "TDM Strategies" toolbox also includes measures to educate and inform travelers about the various transportation options available at the project site itself or within the surrounding vicinity. As with the "original" project, the revised project will also participate in such programs through "passive" marketing and promotional tools such as information kiosks, posters, website, and/or similar displays containing route maps and schedules for all transportation alternatives serving the project site and surrounding area. Therefore, in addition to the project's land use information, the amounts of both the required "baseline" and provided vehicular parking were entered into the VMT Calculator's TDM Strategies "Parking" toolbox ("Reduce Parking Supply" measure) as a

design feature of the project. Similarly, the provision of information about transportation options available to project residents and employees per the "Education and Encouragement" toolbox, along with the inclusion of on-site bicycle parking from the "Bicycle Infrastructure" toolbox, were also identified as "project features". The resulting VMT Calculator worksheets (which show both the daily VMT and vehicular trip values for the revised project) are provided in Attachment B.

As shown in Attachment B, the inclusion of the various "TDM Strategies" measures will reduce the revised project's daily VMT level from its "baseline" of 11,999 to 10,368. Additionally, both its "household per capita VMT" and "work VMT per employee" values will be less than significant (noted as "N/A", or "not applicable" levels in comparison to their respective impact thresholds), and as such, no trip-reduction or other TDM "mitigation" measures in this regard are warranted. It is also of note that, as with the project evaluated in the May 2022 study, the revised project would not result in significant VMT impacts even without the inclusion of these "TDM Strategies".

Revised Project Cumulative VMT Impact Evaluation

Although the revised project is not expected to result in any significant VMT impacts, the City also requires an evaluation of the project's potential contributions toward cumulative VMT impacts. While it is acknowledged that the proposed (revised) project could result in increased daily VMT (per the project-specific VMT impact analysis), the City considers that development projects that do not exhibit significant VMT impacts based on per capita or per employee thresholds are considered to align with the long-term VMT and greenhouse gas reduction goals of both the City and regional Southern California Association of Governments ("SCAG") transportation plans. Therefore, since the revised project itself does not result in any VMT impacts, it is also deemed to have a less-than-significant cumulative VMT impact, and no further analyses are necessary.

Vehicular Trip Generation (Non-CEQA Local Access and Circulation) Analysis Updates

Although the revised project would not result in any significant VMT impacts, other aspects of its development are also subject to review by LADOT, including its effects on pedestrian, bicycle, and public transit accessibility and safety, and to the operations of key intersections and streets in the project area, based on the daily and peak hour trip generation levels of the subject project, and as such, the revised project's vehicular trip generation characteristics were also updated.

Revised Project Traffic Generation Calculations

The vehicular trip generation data used in the May 2022 study were generally obtained from the 10th Edition of the ITE's *Trip Generation* manual, although that publication does not include any information on "affordable" ("VLI") residential units such as those contained in the subject project. Therefore, the daily and peak hour trip generation rates for both the original and revised project's "affordable" residential units were taken from the "Family" category of "affordable housing type" identified in Table 3.3-2 of LADOT's current Transportation Assessment Guidelines ("TAG").

However, as briefly noted earlier, subsequent to the preparation of the May 2022 study, the ITE released an updated, 11th Edition of the *Trip Generation* manual[1], which is now required for use by LADOT in all traffic studies conducted under its jurisdiction. Although generally similar to the data in the superseded 10th Edition, the new version of the *Trip Generation* publication contains trip generation data for several new land use categories, including "Strip Retail Plaza (LU 822)", which is applicable to developments that contain less than 40,000 square feet of retail area, and "Multifamily Housing (High-Rise) Close to Rail Transit (LU 222)", providing trip generation data specifically for residential projects that are located within one-half mile of a rail transit station. Additionally, the trip generation data for the other existing on-site uses and project components has also been updated between the 10th and 11th Editions of the *Trip Generation* manual, with the daily and peak hour trip generation rates for both the "High-Turnover (Sit Down) Restaurant" and "Fast Casual Restaurant" (used for the project's café) categories exhibiting reductions from their prior levels, while the trip rates for the "General Office" land use showed slight increases.

Therefore, for the purposes of this study, the trip generation updates for the revised project used the 11th Edition *Trip Generation* data for all existing and proposed uses, except for the project's "affordable" housing element, which again were based on the data in Table 3.3-2 of the TAG. The trip generation rates used in these updates are shown in Table C-1(a) in Attachment C.

Further, as detailed in the May 2022 study, the ITE trip generation rates shown in Table C-1(a) are typically derived based on the number of vehicles entering and exiting the access driveways of the subject land uses, and as such, do not generally account for a variety of factors that can influence the amount of "net" traffic generated by an individual land use (or multi-use project). As discussed in the May 2022 TIA, for typical mixed-use residential/commercial developments (such as both the "original" and revised projects), the most relevant of these factors involve the effects of "mixed-use interaction", "walk-in patronage", "pass-by" traffic activity, and/or the use of public transportation by project residents, employees, customers, and visitors on the estimates of the amount of project-related traffic that could be added to the area roadways and intersections. Additionally, it is likely that some project residents, as well as employees and/or customers of its proposed commercial (retail, restaurant, café) components, will utilize ride-hailing services (Uber, Lyft, taxis, etc.) to travel to and from the project site, although such activity is considered by LADOT to be intrinsically included in the ITE trip generation rates shown in Table C-1(a), and does not affect the trip generation for either the project's residential or commercial components.

The trip generation calculations for the project analyzed in the May 2022 study assumed that the project's commercial components would exhibit a combination of "mixed-use interaction" and "walk-in patronage" factors (the effects of pass-by traffic activity were not considered to be applicable to the project's uses), while the residents of its market-rate residential units would be expected to show some public transit usage. The trip adjustment factors used in this analysis to

[1] *Trip Generation*, 11h Edition, Institute of Transportation Engineers, Washington, D.C., September 2021.

estimate the vehicular trip generation characteristics for the revised project are identical to those used for the "original" project, with the exception of the elimination of the five-percent "D" Line transit utilization factor (to account for the use of the "close to rail transit" trip generation rates for the project's market-rate residential units), as described in more detail earlier in this report.

Therefore, based on the trip generation rates identified in Table C-1(a), and incorporating the effects of the "mixed-use interaction"/"walk-in" patronage (project commercial components) and transit utilization (market-rate unit residential component) trip adjustment factors described in the preceding pages, the number of trips expected to be generated by both the proposed project and existing site uses were calculated, and the results are shown in Table C-1(b), also provided in Attachment C of this report. Note that the trip generation rates and trip calculations from the May 2022 study ("Table F-1(a)" and "Table F-1(b)") are included in Attachment C for convenience.

As shown in Table C-1(b), the revised project is anticipated to result in a net overall reduction in site-related traffic (after accounting for the removal of the trips generated by the existing uses) of approximately 478 daily trips, including reductions of about four trips (reduction of 21 inbound and increase of 17 outbound trips) during the AM peak hour, and of about 66 trips (reductions of 23 inbound and 43 outbound trips) during the PM peak hour. As also shown in Table C-1(b), these values also represent reductions in both the total daily and peak hour trips compared to the "original" project. Specifically, as described in detail in the May 2022 TIA and summarized in attached Table F-1(b) (from the May 2022 study), the "original" project was also expected to produce a net reduction of approximately 141 trips in daily site-related traffic, although it would exhibit a net increase in site traffic of about 25 trips (reduction of 16 inbound trips and increase of 41 outbound trips) during the AM peak hour, but a net reduction in site traffic of about 32 trips (increase of one inbound and reduction of 33 outbound trips) during the PM peak hour.

Therefore, based on these updated vehicular trip generation evaluations, the revised project is anticipated to result in a reduction of approximately 167 total daily trips, along with reductions of about 13 total trips during the AM peak hour and about six total trips during the PM peak hour, compared to the "original" project. As such, it is reasonable to conclude that the revised project's traffic-related effects on the area transportation network will be less than those identified in the May 2022 study. Further, since the "original" project produced no undesirable effects on the project area roadways or intersections, no such effects are expected from the revised project, and as such, the conclusions of the "Non-CEQA" local access and circulation evaluations for the "original" project identified in the May 2022 study will remain valid for the revised project.

Other Considerations

Finally, although no specific evaluations regarding the currently-proposed project's consistency with City policies related to the provision and support of a sustainable transportation network (CEQA Threshold T-1, Conflicting with Plans, Programs, Ordinances, or Policies), or its impacts

on pedestrian, bicycle, and public transit operations in the project vicinity (CEQA Threshold T-3, Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use), the relatively minor changes to the "original" project design that are currently proposed are minimal, and would not affect the conclusions of the May 2022 study that the project (both the "original" and revised) is compatible with or will not preclude the implementation of any such programs. Therefore, the revised project will not result in any undesirable effects related to these issues.

Conclusions

Based on the preceding evaluations, the potential modifications to the residential component of the proposed Mirabel mixed-use project located at 688 S. Cochran Avenue are not expected to change any of the conclusions identified in the project's approved May 2022 study, and, similar to the "original" project, the revised project is not expected to result in any significant VMT impacts or other undesirable traffic-related effects. As a result, no further analyses are warranted.

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

Sincerely,

Ron Hirsch, P.E.
Principal

Attachments