



## TECHNICAL MEMORANDUM

Date: December 9, 2018

To: Mindy Nguyen, City of Los Angeles Planning Department

From: Tom Gaul

**Subject: *Response to Comment in 11/27/18 Letter from Coalition to Preserve LA Regarding Daily Traffic Estimates***

Ref: 2850

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### **Comment**

In its November 27, 2018, letter, the Coalition to Preserve LA makes the following assertion:

"III. THE SUPPLEMENTAL TRAFFIC ASSESSMENT, VMT AND EIR FOR THE PROJECT PROVIDE CONTRADICTIONARY DAILY TRAFFIC VOLUME NUMBERS

"The Project's documentation provides contradictory evidence regarding the number of daily trips likely to be generated by the Project. The EIR's analysis claims that the Project would result in 2,869 daily trips per day, while the revised November 5, 2018 Supplemental Traffic Assessment projects merely 1,648 daily trips per day. On top of that, the October 24, 2018 Fehr and Peers analysis for the Project projects 1,733 daily vehicle trips."

### **Response**

The Coalition to Preserve LA's assertion fails to recognize the inherent differences among traffic models and trip generation rates. There are numerous models and sources available to estimate daily vehicle trips, and the professional transportation engineering community is constantly striving to improve methodologies. The 2,869 daily trips estimated in the Sunset & Gordon Draft Supplemental EIR (August 2017) was based on trip generation rates from the Institute of Transportation Engineers' (ITE's) *Trip Generation, 9<sup>th</sup> Edition* (ITE, 2012), which was a commonly used source for trip generation rates at that time. As discussed in the *Traffic Impact Analysis for Sunset & Gordon Mixed-Use* (Overland Traffic Consultants, October 2016), these rates were appropriately adjusted for internal tripmaking, transit, and retail pass-by using standard methodologies, yielding the estimate of 2,869 daily vehicle trips (before TDM mitigation) generated by the Sunset & Gordon Modified Project.

As discussed in the November 5, 2018, Supplemental Traffic Assessment, ITE subsequently published *Trip Generation, 10<sup>th</sup> Edition* in September 2017, an update to the prior edition. Among other things, the 10<sup>th</sup> Edition published, for the first time, trip generation rates for multifamily residential and office uses categorized by suburban versus dense multi-use urban versus city core (rates in the 9<sup>th</sup> Edition manual were primarily based on surveys in suburban areas). These rates appropriately reflect the lower trip generation per unit of uses in dense infill urban areas such as Hollywood. Using the 10<sup>th</sup> Edition trip generation rates



and standard adjustments for internal tripmaking, transit, and retail pass-by, the Modified Project is estimated to generate 1,648 daily vehicle trips (before TDM mitigation).

The October 24, 2018 Fehr & Peers analysis used the new City of Los Angeles Vehicle Miles Traveled (VMT) Calculator to estimate daily trips and VMT for the project, consistent with the new transportation impact assessment metrics and methodologies that the City is developing to implement the use of VMT rather than vehicle level of service (LOS) as the primary metric for evaluating a project's environmental impacts on the transportation system under CEQA, in accordance with California Senate Bill 743. The LA VMT Calculator starts with ITE trip generation rates, but then implements the MXD (mixed-use) methodology from the U.S. EPA and utilizes socioeconomic, transit, and trip length data from the Los Angeles citywide travel demand model (itself calibrated to Los Angeles conditions) to adjust the trips for internalization, transit, and walkability. The LA VMT Calculator was calibrated based on local count data collected in the City of Los Angeles. Accordingly, the VMT Calculator methodology is different than the ITE methodology, which is based solely on nationwide survey data. The VMT Calculator estimates that 1,733 daily vehicle trips (before TDM mitigation) would be generated by the Modified Project. This is only an 85-trip difference as compared to the ITE 10<sup>th</sup> Edition analysis, and does not change any of the conclusions in the Supplemental EIR.

The difference in trip generation rates among these models is not "contradictory." Instead, it is based on different approaches to determining daily vehicle trips. Further, the VMT Calculator's approach has not yet been adopted by the City. Nevertheless, the difference between the ITE and VMT Calculator estimates would not result in a new significant impact that was not identified in the Supplemental EIR. Instead, both the analyses under ITE 10<sup>th</sup> Edition and the VMT Calculator demonstrate that the Supplemental EIR's conclusions are conservative and confirm that the Modified Project's traffic impacts would be less than significant with mitigation.