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VIA HAND DELIVERY & E-MAIL

November 27, 2018

*Hand Delivered to the November 27, 2018 Meeting*

Planning and Land Use Management Committee, City of Los Angeles  
 John Ferraro Council Chamber, Room 340, City Hall  
 200 North Spring Street  
 Los Angeles, CA 90012

*E-mail Delivery*

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Date: 11/27/18  
 Submitted in PLUM Committee  
 Council File No: 08-1509-S2 and  
 Item No.: 8+9 08-1509-S3  
communication from  
Appellant Representative

RE: Agenda Items Nos. 8 & 9, Council Files Nos. 08-1509-S3, 08-1509-S2.

5929-5945 W. Sunset Boulevard / 1512-1540 N. Gordon Street, Los Angeles,  
California 90028/Sunset and Gordon Mixed Use Project (Case No. ENV-2015-  
1923-EIR, VTT-74172, CPC-2015-1922-GPA-VZC-HD CUB DB-SPR).

Dear Councilmembers Harris-Dawson, Englander, Price, Jr., Blumenfield and Cedillo, as well as Ms. Holly Wolcott, Ms. Mindy Hguyen, Ms. Nuri Cho and Ms. Zina Cheng

On behalf of the Coalition to Preserve LA (“**Appellant**” or “**Coalition**”), my Office is submitting comments in support of its appeal of Los Angeles City Planning Commission’s August 9, 2018 approval of CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR, Vesting Tentative Tract No. 74172, its related CEQA findings (ENV-2015-1923-EIR, as well as all related approvals included CPC-2015-1922,GPA-VZC-HD-CUB-DB-SPR, which includes a General Plan Amendment to amend the 1988 Hollywood Community Plan to redesignate the portion of the Project Site located at 1528 – 1540 N. Gordon Street (Lots 17,18 and 19 of Bagnoli Tract No. 2) from High Medium Residential to Regional Center Commercial, a Vesting Zone and Height District Change from (I)(Q)C2-2D and (I)(Q)R4-1VL to C2-2D to permit a maximum allowable Floor Area Ration (FAR) not to exceed 4.5:1, a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed ground floor restaurant, a density bonus to set aside 15 units for Very Low Income households, and a Site Plan Review for a project which creates or results in an increase of 50 or more dwelling units.

Coalition is a nonprofit organization in Los Angeles that advocates for smart land use planning, government transparency, open space, affordable housing, support for the City’s homeless population, and against gentrification. Coalition, its employees, customers, and the many persons

whom Coalition serves are beneficially interested in and will be impacted by the outcome of this Project.

Appellant expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Appellant incorporates by reference all comments raising issues regarding the SEIR submitted prior to certification of the SEIR for the Project. *Citizens for Clean Energy v. City of Woodland* (2014) 225 CA4th 173, 191 (finding that any party who has objected to the Project's environmental documentation may assert any issue timely raised by other parties).

This letter is intended to only supplement points already raised in Appellant's previous comments to the City concerning this Project.

#### **I. THE COUNCIL FILE HAS NO STAFF REPORT RESPONDING TO THE APPEAL**

As of noon today, City Planning Staff has not issued a staff analysis / report of the pending appeals. Coalition has not been given an opportunity to review and respond to the City's response to its appeal as well as to the supplemental traffic assessments submitted in support of the Project's environmental impact report in violation of due process and fair hearing rights. The City could continue this hearing until City Planning has had a chance to provide its position with regards to this

#### **II. THE NOVEMBER 5, 2018 SUPPLEMENTAL TRAFFIC ASSESSMENT FOR THE PROJECT REQUIRES REVISION AND RECIRCULATION OF THE PROJECT'S SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT**

CEQA requires that a Project's environmental documents be revised and recirculated to the public when significant new information is added to an environmental impact report prior to certification. Section 21092.1 of the California Public Resources Code provides that:

When significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 and consultation has occurred pursuant to Sections 21104 and 21153, but prior to certification, the public agency shall give notice again pursuant to Section 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report.

(See also 14 Cal. Code of Regulations § 15088.5.) Revisions to environmental analysis in an environmental impact report requires recirculation of the environmental impact report to give the public a meaningful opportunity to comment. (*Gray v. Cty. of Madera* (2008) 167 Cal. App. 4th 1099, 1121 – 22.)

Here, The City's November 5, 2018 Supplemental Traffic Assessment significantly revises the Project's environmental impact report by concluding that "[t]he intersections with previously identified mitigation would no longer be significantly impacted by the project to the point where mitigation would no longer be required." (Nov. 5, 2018 Supplemental Traffic Assessment at 1.) Since the traffic mitigation measures include costly, significant modifications to the intersections that are likely to have their own traffic inducing impacts, the public should be given the right to

comment upon the necessity or lack of necessity for these traffic mitigation measures. (*See* MM K.1-1 – 1-3.)

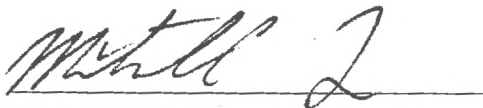
**III. THE SUPPLEMENTAL TRAFFIC ASSESSMENT, VMT AND EIR FOR THE PROJECT PROVIDE CONTRADICTIONARY DAILY TRAFFIC VOLUME NUMBERS**

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.

**IV. CONCLUSION**

Coalition remains open to discussions concerning this Project. For the reasons, Coalition requests that the City Council grant Coalition's appeal of the City Planning Commission's approval of CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR, Vesting Tentative Tract Map No. 74172 and certification of the Final SEIR.

Sincerely,



Mitchell M. Tsai

Attorneys for Coalition to Preserve LA

Attached:

Planning Department Transmittal to the City Clerk's Office Supplemental CF 08-1509-S2 / 08-1509-S3; and

Email from Jennifer Roy, Latham & Watkins to Zina Cheng, City of Los Angeles RE: Sunset & Gordon Mixed-Use Project (CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR) (VTT-74172) (ENV-2015-1923-EIR).

**EXHIBIT 1**



**PLANNING DEPARTMENT TRANSMITTAL  
TO THE CITY CLERK'S OFFICE  
SUPPLEMENTAL  
CF 08-1509-S2 / 08-1509-S3**

<b>CITY PLANNING CASES:</b>	<b>ENVIRONMENTAL DOCUMENT:</b>	<b>COUNCIL DISTRICT:</b>
CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR; VTT-74172-1A	ENV-2015-1923-EIR	13
<b>PROJECT ADDRESS:</b>		
5929-5945 WEST SUNSET BOULEVARD AND 1512-1540 NORTH GORDON STREET		
<b>PLANNER CONTACT INFORMATION:</b>	<b>TELEPHONE NUMBER:</b>	<b>EMAIL ADDRESS:</b>
MINDY NGUYEN	(213) 847-3674	<a href="mailto:MINDY.NGUYEN@LACITY.ORG">MINDY.NGUYEN@LACITY.ORG</a>

<b>NOTES / INSTRUCTION(S):</b>	
<p>PLEASE PROVIDE THE PLUM COMMITTEE WITH THE ATTACHED TECHNICAL CORRECTIONS PROPOSED TO THE LETTERS OF DETERMINATION FOR THE FOLLOWING CASE NOS.: <b>CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR</b> and <b>VTT-74172-1A</b>.</p> <p><b>**UPDATED ENCLOSURE**</b></p>	
<b>TRANSMITTED BY:</b>	<b>TRANSMITTAL DATE:</b>

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

5939 W Sunset Bl  
DOT Case No. CEN 14-42700

Date: November 5, 2018

To: Nuri Cho, City Planning Associate  
Department of City Planning

From: Wes Pringle, Transportation Engineer  
Department of Transportation

Subject: **SUPPLEMENTAL TRAFFIC ASSESSMENT FOR THE PROPOSED SUNSET AND GORDON MIXED-USE PROJECT AT 5929-5945 WEST SUNSET BOULEVARD AND 1512-1540 NORTH GORDON STREET (ENV-2015-1923-EIR/VTT-74172/CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR/AA-2015-1924-PMLA)**

On July 31, 2018 and August 7, 2018, the Department of Transportation (DOT) issued traffic assessment reports (Attachment IV) to the Department of City Planning (DCP) on the proposed Sunset and Gordon mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street to address comments on the Draft Supplemental Environmental Impact Report (EIR) and the Final EIR and the appeal to the project's Vesting Tentative Tract Map. On October 24, 2018, Overland Traffic Consultants, Inc. (OTC) submitted a project traffic evaluation based on the Institute of Transportation Engineers (ITE) Trip Generation Manual 10<sup>th</sup> Edition and included a response to project Condition of Approval 17 approved by the Los Angeles City Planning Commission on August 9, 2018. Also, addressing Condition of Approval 17, the technical memorandum dated October 24, 2018 submitted by Fehr and Peers, assesses the vehicle miles traveled (VMT) generated by the proposed project with and without mitigation. After completing a review of the analyses, DOT concurs with the analyses that the project impacts to the study intersections and roadway segments would be less than significant prior to mitigation and the project impacts would be further reduced with mitigation. Therefore, all of DOT's prior recommendations in the December 27, 2016 letter (Attachment 2) remain fully appropriate and shall remain in effect.

OTC's October 24, 2018 evaluation updates the project's trip generation assumptions to reflect current best practices for transportation engineers by applying the ITE Trip Generation Manual 10<sup>th</sup> Edition (Attachment I). The evaluation compared the 9<sup>th</sup> and 10<sup>th</sup> Editions and determined that the potential for a significant transportation impact associated with the project by applying the 10<sup>th</sup> Edition is lower than that of the 9<sup>th</sup> Edition. The intersections with previously identified mitigation would no longer be significantly impacted by the project to the point where mitigation would no longer be required (Attachment II).

OTC's evaluation included confirmation that the project will continue to have less than significant traffic impacts with the imposition of Condition of Approval 17 which requires the bundling of parking for affordable residential units. Fehr and Peer's technical memorandum supports this confirmation and finds that with the implementation of the project's proposed Transportation Demand Management Plan, the project would not have a significant impact on either the household VMT per capita or work VMT per employee as estimated by the City's VMT Calculator (Attachment III).

If you have any questions, please contact Eileen Hunt of my staff at (213) 972-8481.

Attachments

*K:\Letters\2018\CEN14-42700\_5939 Sunset & Gordon MU\_supplemental.docx*

c: : Craig Bullock, Council District No. 13  
Bhuvan Bajaj, Hollywood-Wilshire District, DOT  
Liz Fleming, Overland Traffic Consultants, Inc

Bert Moklebust, BOE Development Services  
Taimour Tanavoli, Case Management, DOT

Table 2  
Modified Project Trip Generation & Comparison of Trips Using  
10<sup>th</sup> Edition Manual & 9<sup>th</sup> Edition Manual

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
<b>Proposed Project</b>								
Apartment	299 units	601	63	8	55	57	40	17
Transit	0%	0	0	0	0	0	0	0
Subtotal Apartment		601	63	8	55	57	40	17
Office	38,440 sf	374	32	27	5	33	6	28
Transit (10% for Daily GU/S rate only)	0%	(37)	0	0	0	0	0	0
Subtotal Office		337	32	27	5	33	6	28
Community Serving Retail	2,495 sf	94	2	1	1	10	5	5
Transit	10%	(9)	(0)	(0)	(0)	(1)	(1)	0
Internal Trips	10%	(8)	(0)	(0)	(0)	(1)	(0)	(1)
Pass-By	50%	(38)	(0)	(0)	(0)	(4)	(2)	(2)
Subtotal Retail		39	2	1	1	4	2	2
Quality Restaurant	3,700 sf	310	3	2	1	29	19	10
Transit	10%	(31)	(0)	(0)	(0)	(3)	(2)	(1)
Internal Trips	10%	(28)	(0)	(0)	(0)	(3)	(2)	(1)
Pass-By	10%	(25)	(0)	(0)	(0)	(2)	(1)	(1)
Subtotal Restaurant		226	3	2	1	21	14	7
Coffee Shop-No Drive Thru	1,475 sf	1,113	149	76	73	54	27	27
Transit (except Daily DM-UU rate)	10%	0	(15)	(8)	(7)	(5)	(2)	(3)
Internal Trips	20%	(223)	(27)	(14)	(13)	(10)	(5)	(5)
Pass-By	50%	(445)	(54)	(27)	(27)	(19)	(10)	(9)
Subtotal Coffee Shop		445	53	27	26	20	10	10
Public Park	18,962 sf	0	0	0	0	0	0	0
Transit	10%	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Subtotal Park		0	0	0	0	0	0	0
<b>Total Proposed ITE 10th Ed.</b>		<b>1,648</b>	<b>153</b>	<b>65</b>	<b>88</b>	<b>135</b>	<b>71</b>	<b>64</b>
<b>Total Proposed ITE 9th Ed. (in Study)</b>		<b>2,869</b>	<b>254</b>	<b>108</b>	<b>146</b>	<b>263</b>	<b>145</b>	<b>118</b>
<b>Difference ITE Trips 10th Ed - 9th Ed</b>		<b>(1,221)</b>	<b>(101)</b>	<b>(43)</b>	<b>(58)</b>	<b>(128)</b>	<b>(74)</b>	<b>(54)</b>

DM-UU = Dense Multi-Use Urban

GU/S = General Urban/Suburban

Undertaking best engineering practices and utilizing the more current 10<sup>th</sup> Edition Manual demonstrates that the Modified Project's impacts are overestimated in the Modified Project's Traffic Study and Supplemental Traffic Analysis. Using the 10<sup>th</sup> Edition Manual, all of the study intersections would have less traffic from the Modified Project than was anticipated using the 9<sup>th</sup> Edition Manual. Specifically, under the 10<sup>th</sup> Edition Manual analysis, the intersections of Gower Street and Sunset Boulevard, Bronson Avenue and Sunset Boulevard, and Sunset Boulevard and

No.	Intersection	Peak Hour	2016* Traffic		2016* Traffic +Project				Future (2018) Without Project		Future (2018) With Project				Future (2018) With Mitigation			
			CMA	LOS	CMA	LOS	Impact	Significant	CMA	LOS	CMA	LOS	Impact	Significant	CMA	LOS	Impact	Significant
1	Cahuenga Bl & Franklin Av	AM	0.973	E	0.974	E	+ 0.001	NO	1.047	F	1.047	F	+ 0.000	NO	1.047	F	+ 0.000	NO
		PM	0.837	D	0.837	D	+ 0.000	NO	0.898	D	0.898	D	+ 0.000	NO	0.898	D	+ 0.000	NO
2	Cahuenga Bl & Hollywood Bl	AM	0.840	D	0.841	D	+ 0.001	NO	0.905	E	0.906	E	+ 0.001	NO	0.907	E	+ 0.002	NO
		PM	0.752	C	0.753	C	+ 0.001	NO	0.833	D	0.834	D	+ 0.001	NO	0.835	D	+ 0.002	NO
3	Cahuenga Bl & Sunset Bl	AM	0.751	C	0.753	C	+ 0.002	NO	0.825	D	0.837	D	+ 0.012	NO	0.827	D	+ 0.002	NO
		PM	0.764	C	0.766	C	+ 0.002	NO	0.855	D	0.857	D	+ 0.002	NO	0.859	D	+ 0.004	NO
4	Vine St & Hollywood Bl	AM	0.769	C	0.770	C	+ 0.001	NO	0.812	D	0.814	D	+ 0.002	NO	0.814	D	+ 0.002	NO
		PM	0.734	C	0.735	C	+ 0.001	NO	0.783	C	0.785	C	+ 0.002	NO	0.784	C	+ 0.001	NO
5	Vine St & Sunset Bl	AM	0.795	C	0.797	C	+ 0.002	NO	0.851	D	0.853	D	+ 0.002	NO	0.853	D	+ 0.002	NO
		PM	0.866	D	0.870	D	+ 0.004	NO	0.971	E	0.976	E	+ 0.005	NO	0.976	E	+ 0.005	NO
6	Vine St & Fountain Av	AM	0.719	C	0.721	C	+ 0.002	NO	0.763	C	0.765	C	+ 0.002	NO	0.765	C	+ 0.002	NO
		PM	0.781	C	0.783	C	+ 0.002	NO	0.837	D	0.838	D	+ 0.001	NO	0.838	D	+ 0.001	NO
7	Vine St & Santa Monica Bl	AM	0.875	D	0.877	D	+ 0.002	NO	0.923	E	0.925	E	+ 0.002	NO	0.925	E	+ 0.002	NO
		PM	0.878	D	0.881	D	+ 0.003	NO	0.942	E	0.944	E	+ 0.002	NO	0.944	E	+ 0.002	NO
8	Gower St & Franklin Av	AM	0.629	B	0.629	B	+ 0.000	NO	0.668	B	0.668	B	+ 0.000	NO	0.668	B	+ 0.000	NO
		PM	0.713	C	0.716	C	+ 0.003	NO	0.766	C	0.768	C	+ 0.002	NO	0.777	C	+ 0.011	NO
9	Gower St & Hollywood Bl	AM	0.681	B	0.686	B	+ 0.005	NO	0.779	C	0.784	C	+ 0.005	NO	0.784	C	+ 0.005	NO
		PM	0.653	B	0.658	B	+ 0.005	NO	0.771	C	0.776	C	+ 0.005	NO	0.776	C	+ 0.005	NO
10	Gower St & Sunset Bl	AM	0.685	B	0.690	B	+ 0.005	NO	0.772	C	0.781	C	+ 0.009	NO	0.781	C	0.009	NO
		PM	0.802	D	0.811	D	+ 0.009	NO	0.953	E	0.961	E	+ 0.008	NO	0.961	E	0.008	NO
11	Gower St & Fountain Av	AM	0.705	C	0.712	C	+ 0.007	NO	0.741	C	0.748	C	+ 0.007	NO	0.747	C	+ 0.006	NO
		PM	0.814	D	0.817	D	+ 0.003	NO	0.912	E	0.915	E	+ 0.003	NO	0.915	E	+ 0.003	NO
12	Gower St & Santa Monica Bl	AM	0.774	C	0.779	C	+ 0.005	NO	0.810	D	0.815	D	+ 0.005	NO	0.815	D	+ 0.005	NO
		PM	0.841	D	0.845	D	+ 0.004	NO	0.951	E	0.954	E	+ 0.003	NO	0.954	E	+ 0.003	NO
13A	Gordon St (west) & Sunset Bl	AM	0.595	A	0.608	B	+ 0.013	NO	0.649	B	0.663	B	+ 0.014	NO	0.661	B	+ 0.012	NO
		PM	0.497	A	0.507	A	+ 0.010	NO	0.541	A	0.551	A	+ 0.010	NO	0.549	A	+ 0.008	NO
13B	Gordon St (east) & Sunset Bl	AM	0.395	A	0.481	A	+ 0.086	NO	0.437	A	0.510	A	+ 0.073	NO	0.505	A	+ 0.068	NO
		PM	0.417	A	0.455	A	+ 0.038	NO	0.485	A	0.523	A	+ 0.038	NO	0.519	A	+ 0.034	NO
14	Bronson Av & Hollywood Bl	AM	0.675	B	0.677	B	+ 0.002	NO	0.737	C	0.739	C	+ 0.002	NO	0.739	C	+ 0.002	NO
		PM	0.617	B	0.629	B	+ 0.012	NO	0.705	C	0.717	C	+ 0.012	NO	0.716	C	+ 0.011	NO
15	Bronson Av & Sunset Bl	AM	0.731	C	0.747	C	+ 0.016	NO	0.865	D	0.881	D	+ 0.016	NO	0.88	D	0.015	NO
		PM	0.722	C	0.732	C	+ 0.010	NO	0.861	D	0.866	D	+ 0.005	NO	0.865	D	+ 0.004	NO
16	Bronson Av & Santa Monica Bl	AM	0.547	A	0.552	A	+ 0.005	NO	0.582	A	0.588	A	+ 0.006	NO	0.588	A	+ 0.006	NO
		PM	0.513	A	0.517	A	+ 0.004	NO	0.551	A	0.555	A	+ 0.004	NO	0.554	A	+ 0.003	NO
17	101 Fwy SB Ramps & Hollywood Bl	AM	0.641	B	0.642	B	+ 0.001	NO	0.698	B	0.700	C	+ 0.002	NO	0.699	B	+ 0.001	NO
		PM	0.480	A	0.486	A	+ 0.006	NO	0.529	A	0.535	A	+ 0.006	NO	0.534	A	+ 0.005	NO
18	101 Fwy NB Ramps & Hollywood Bl	AM	0.579	A	0.588	A	+ 0.009	NO	0.626	B	0.635	B	+ 0.009	NO	0.634	B	+ 0.008	NO
		PM	0.540	A	0.547	A	+ 0.007	NO	0.600	B	0.607	B	+ 0.007	NO	0.607	B	+ 0.007	NO
19	Van Ness Av & Sunset Bl	AM	0.619	B	0.623	B	+ 0.004	NO	0.675	B	0.679	B	+ 0.004	NO	0.678	B	+ 0.003	NO
		PM	0.717	C	0.721	C	+ 0.004	NO	0.765	C	0.769	C	+ 0.004	NO	0.769	C	+ 0.004	NO
20	Wilton Pl & Sunset Bl	AM	0.605	B	0.613	B	+ 0.008	NO	0.668	B	0.677	B	+ 0.009	NO	0.677	B	+ 0.009	NO
		PM	0.656	B	0.658	B	+ 0.002	NO	0.716	C	0.718	C	+ 0.002	NO	0.717	C	+ 0.001	NO
x1	Argyle Av & Sunset Bl	AM	0.599	A	0.603	B	+ 0.004	NO	0.659	B	0.664	B	+ 0.005	NO	0.663	B	+ 0.004	NO
		PM	0.585	A	0.589	A	+ 0.004	NO	0.659	B	0.663	B	+ 0.004	NO	0.663	B	+ 0.004	NO
x2	Argyle Av & Hollywood Bl	AM	0.549	A	0.550	A	+ 0.001	NO	0.629	B	0.629	B	+ 0.000	NO	0.629	B	+ 0.000	NO
		PM	0.562	A	0.563	A	+ 0.001	NO	0.702	C	0.703	C	+ 0.001	NO	0.703	C	+ 0.001	NO
x3	Argyle Av & Franklin Av/US 101 NB OnRamp	AM	0.301	A	0.301	A	+ 0.000	NO	0.340	A	0.340	A	+ 0.000	NO	0.340	A	+ 0.000	NO
		PM	0.552	A	0.552	A	+ 0.000	NO	0.646	B	0.646	B	+ 0.000	NO	0.646	B	+ 0.000	NO

\* Existing is year 2017 for Argyle intersection x1 and 2018 for the Argyle Avenue intersections x2 and x3.

**Mitigation**

- 5 Vine Street & Sunset Boulevard - None Needed, Not a Significant Traffic Impact
- 10 Gower Street & Sunset Boulevard - None Needed, Not a Significant Traffic Impact
- 15 Bronson Avenue & Sunset Boulevard - None Needed, Not a Significant Traffic Impact

Note TDM measures still listed but not needed - reduces vehicle trips to and from the site improving operations system wide

# CITY OF LOS ANGELES VMT CALCULATOR Version 1.0



## Project Information

**Project:** Sunset & Gordon Mixed-Use Project (30 Affordable)  
**Scenario:** (TG 9/21/18) [WWW](#)  
**Address:** 1512 N GORDON ST 90028 [Q](#)



Land Use Type	Value	Unit
Office   General Office	38.44	ksf
Housing   Multi-Family	269	DU
Retail   General Retail	2.495	ksf
Retail   Fast-Food Restaurant	1.475	ksf
Retail   Quality Restaurant	3.7	ksf
Office   General Office	38.44	ksf
Housing   Affordable Housing - Family	30	DU

Click here to add a single custom land use type (will be included in the above list)

## TDM Strategies

Select each section to show individual strategies  
 Use  to denote if the TDM strategy is proposed part of the project or is a mitigation strategy

**A Parking**

Proposed Prj  Mitigation  city code parking provision for the project site

Proposed Prj  Mitigation  actual parking provision for the project site

**Unbundle Parking**  Proposed Prj  Mitigation  monthly parking cost (dollar) for the project site

**Parking Cash-Out**  Proposed Prj  Mitigation  percent of employees eligible

**Price Workplace Parking**  Proposed Prj  Mitigation  daily parking charge (dollar)

percent of employees subject to priced parking

**Residential Area Parking Permits**  Proposed Prj  Mitigation  cost (dollar) of annual permit

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**B Transit**

---

**C Education & Encouragement**

---

**D Commute Trip Reductions**

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**E Shared Mobility**

---

**F Bicycle Infrastructure**

---

**G Neighborhood Enhancement**

## Analysis Results

Proposed Project	With Mitigation
<b>1,733</b> Daily Vehicle Trips	<b>1,443</b> Daily Vehicle Trips
<b>10,651</b> Daily VMT	<b>8,910</b> Daily VMT
<b>6.9</b> Household VMT per Capita	<b>5.2</b> Household VMT per Capita
<b>8.1</b> Work VMT per Employee	<b>7.0</b> Work VMT per Employee

### Significant VMT Impact?

Household: Yes	Household: No
Threshold = 6.0 15% Below APC	Threshold = 6.0 15% Below APC
Work: Yes	Work: No
Threshold = 7.6 15% Below APC	Threshold = 7.6 15% Below APC



Figure 1  
VMT Calculator Analysis for Sunset & Gordon Modified Project

CITY OF LOS ANGELES  
INTER-DEPARTMENTAL CORRESPONDENCE

5939 W. Sunset Bl  
DOT Case No. CEN 14-42700

Date: August 7, 2018

To: Nuri Cho, City Planning Associate  
Department of City Planning

From: Eddie Guerrero, Senior Transportation Engineer  
Department of Transportation

Subject: **RESIDENTIAL TRAFFIC IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT PROJECT AT 5939 WEST SUNSET BOULEVARD (SUNSET AND GORDON MIXED-USE PROJECT; CASE NO. ENV-2015-1923-EIR)**

In response to comment received to the Sunset and Gordon mixed-use project supplemental draft environmental impact report (SEIR), questioning the adequacy of the project residential impact analysis, the Department of Transportation (DOT) provided an e-mail communication, dated March 21, 2018, to the Department of City Planning (DCP) to confirm acceptance and approval of the methodology and results presented by Overland Traffic Consultants (OTC) in the project traffic impact study report, dated October 2016. Subsequent to this communication, it was brought to DOT's attention that additional comment, again regarding the adequacy of the project residential impact analysis, had been submitted, including comment to the project final environmental impact report (FEIR) as well as an appeal to the project's Vesting Tentative Tract Map. In a correspondence dated July 31, 2018, DOT confirmed approval of the findings presented in both the March 2018 Supplemental Analysis and the July 2018 Response to Comment report prepared by OTC which included attention to this issue. However, inasmuch as the March 21<sup>st</sup> and July 31<sup>st</sup> communications only summarily addressed and affirmed DOT's acceptance and approval of the analysis conducted on this issue, this communication is being provided to more fully address the residential impact analysis question raised during the EIR review process and Tract Map appeal and, to further affirm DOT's acceptance and approval of the analysis completed for this project.

DISCUSSION

As previously stated (above), an e-mail communication, dated March 21, 2018, was addressed to DCP to confirm DOT's determination that the project traffic impact study's street segment analysis was conducted correctly and is in full compliance with applicable DOT guidance, policies and procedures. Therefore, consistent with the Transportation Study's conclusions, the proposed project would not have a significant street segment impact on Gordon Street. However, subsequent to this communication, DOT was made aware that additional comment had been submitted during the project Final EIR review period as well as an appeal to the project's Vesting Tentative Tract Map (VTTM) where, in addition to other questions regarding the traffic impact analysis, there was again a question raised as to the adequacy of the residential street impact analysis completed for the project.

Specifically, the VTTM appeal argues that the "*the street segment analysis was conducted incorrectly and did not disclose a significant impact on Gordon Street*". The appeal also states that the Transportation Study's analysis of potential impacts on residential street segments should have considered residential traffic generated by the project in addition to commercial traffic generated by the project. However, including residential traffic as part of an analysis of a residential street segment



would be an incorrect application of DOT's policies and procedures for determining a project's transportation impacts.

DOT's Traffic Study Policies and Procedures (August 2014) and Transportation Impact Study Guidelines (December 2016) provide the requirements for analyzing potential impacts to residential street segments. Specifically, the Traffic Study Policies and Procedures state:

*Commercial projects may be required to conduct residential street impact analysis. A local residential street can be potentially impacted based on an increase in the average daily traffic volumes. The objective of the residential street analysis is to determine the potential for cut-through traffic impacts on a residential street that can result from a Project. Cut-through trips are measured as vehicles that bypass a congested arterial or intersection by instead opting to travel along a residential street.*

(Traffic Study Policies and Procedures, p. 16.) In addition, the Traffic Study Policies and Procedures state that:

*When selecting residential street segments for analysis during the traffic study scoping process, all of the following conditions must be present:*

*- the proposed project is a nonresidential development and not a school.*

(Traffic Study Policies and Procedures, p. 16.) The December 2016 Transportation Impact Study Guidelines include these same statements. As provided by both the Traffic Study Policies and Procedures and Transportation Impact Study Guidelines, an analysis of potential impacts to residential street segments must be completed for commercial projects but is not required for residential projects. This is consistent with the fact that both documents refer to cut-through trips as those trips resulting from a commercial project that bypass congested arterials by using residential streets.

Based on these applicable guidelines, DOT requires for projects such as the Sunset and Gordon mixed-use development project, which includes both residential and commercial components, that the traffic study evaluate potential cut-through traffic and impacts on residential street segments based only on traffic generated by the project's commercial component. Traffic generated by the residential component should not be included as part of the analysis. Accordingly, because the Transportation Study focused only on traffic generated by the Sunset and Gordon project's commercial component in its analysis of residential street segment impacts, the analysis was conducted consistent with DOT guidance, policies and procedures.

The DOT guidance, policies and procedures are consistent with the applicable CEQA Guidelines, which ask whether the project would:

*a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (CEQA Guidelines Appendix G, XVI Transportation/Traffic.)*

CEQA leaves the discretion to the City acting as the lead agency to determine what constitutes an impact under the Appendix G guidelines. Because commercial trips have the potential to intrude into residential neighborhoods as "cut through" trips to reach new commercial destinations, DOT has

determined that commercial trips and their effect on residential streets should be evaluated as part of a transportation impact analysis.

There are a number of reasons for treating commercial trips differently than residential trips. As communicated previously, the specific intent of the street segment analysis is to identify "cut-through" traffic that is primarily defined as commercial traffic that uses the local neighborhood street network to "by-pass" congested arterials. Residential traffic that is using the local street network merely as direct access to the project site is not "cut-through" traffic and is therefore not applicable to the residential street segment analysis. In addition, in designing development projects such as the Sunset and Gordon project, DOT and City Mobility Plan 2035 policies generally require that driveways be located off arterials and instead placed on local streets. Keeping driveways off arterials such as Sunset Boulevard improves the circulation system as a whole because this results in removing the driveway operation away from the arterials, helping to reduce congestion on the City's busiest streets. It also minimizes interference with pedestrian access, furthering the City's objectives to maintain its streets as complete streets that serve all users regardless of mode. In fact, the project furthers the City's efforts to design complete streets with the addition of Continental Crosswalks at Gower and Sunset and Bronson and Sunset as well as improvements to the bus stop adjacent to the project on Sunset. This focus on the circulation system as a whole is consistent with CEQA Guidelines Appendix G.

Finally, it should be noted that DOT's election to evaluate cut-through traffic from commercial uses on residential street segments is not specifically required by CEQA. It is an analysis that the City acting as lead agency requires in transportation analyses as part of its evaluation of the circulation system as a whole. Many jurisdictions focus on the analysis of level of service at intersections only, and do not evaluate the impacts of cut-through traffic on residential street segments.

#### CONCLUSION

Therefore, in summary, as detailed above, the Transportation Study's analysis of residential street segments for this project was properly conducted, and trips generated by the project's residential uses should not have been included in the analysis.

A copy of both the initial (March 21, 2018) DOT e-mail response on this issue as well as the recent July 31<sup>st</sup> communication are provided as attachments (A and B respectively) to this letter.

If you have any questions, please contact me at (213) 972-8476.

Attachments

EG:hs





ATTACHMENT A

Eddie Guerrero <eddie.guerrero@lacity.org>

5929-5945 W. Sunset Boulevard / 1512-1540 N. Gordon Street

Eddie Guerrero <eddie.guerrero@lacity.org>  
To: Mindy Nguyen <Mindy.Nguyen@lacity.org>

Wed, Mar 21, 2018 at 1:43 PM

Mindy,

I was contacted by a traffic consultant on behalf of the subject project regarding the comment letter submitted by Mitchell Tsai to the project SEIR and the specific accusation that the neighborhood impact analysis was incorrectly applied. Since being contacted by the consultant I have reviewed the analysis and confirmed that the traffic study was completed correctly.

The reason the residential component of the project traffic was not considered in the neighborhood impact analysis is because the specific intent of this analysis is to identify "cut-through" traffic that is primarily defined as commercial traffic that uses the local neighborhood street network to "by-pass" congested arterials. Residential traffic that is using the local street network merely as direct access to the project property is not "cut-through" traffic and is therefore not applicable to this analysis.

I informed the contact that I would coordinate with you on this issue and provide whatever input is needed so please advise if this communication will suffice as appropriate redress on this matter or if a more formal response is required and it will be provided.

A copy of the aforementioned comment letter is attached for reference.

If further discussion is needed, please feel free to contact me directly.

Regards.

**Eddie Guerrero**

Senior Transportation Engineer  
Metro Development Review

Los Angeles Department of Transportation  
100 South Main Street, 9th Floor  
Los Angeles, California 90012  
213.972.8476

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**AHF Letter Excerpt.pdf**  
915K

# ATTACHMENT B


FORM GEN. 160A (Rev. 1/82)

## CITY OF LOS ANGELES INTER-DEPARTMENTAL CORRESPONDENCE

5939 W. Sunset Bl  
DOT Case No. CEN 14-42700

Date: July 31, 2018

To: Luciralia Ibarra, Senior City Planner  
Department of City Planning

From:  Wes Pringle, Transportation Engineer  
Department of Transportation

Subject: **SUPPLEMENTAL TRAFFIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT PROJECT  
AT 5939 WEST SUNSET BOULEVARD**

On December 27, 2016 the Department of Transportation (DOT) issued a traffic assessment report to the Department of City Planning on the proposed mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street. Subsequent to the release of the Draft Supplemental Environmental Impact Report (DEIR), a supplemental traffic analysis, prepared by Overland Traffic Consultants (OTC), dated March 2018, was completed to address comments received to the DEIR. After completing a review of the additional analysis, DOT has determined that the report adequately reflects the potential traffic impacts of the proposed project. Therefore, all of DOT's prior recommendations in the December 27, 2016 letter remain fully appropriate and shall remain in effect.

DOT has also reviewed the summary response prepared by OTC, dated July 2018, to the June 19, 2018 comment letter submitted by RK Engineering Group, Inc. to the Final Supplemental EIR and has found the findings of the response to be complete and appropriate.

### BACKGROUND

On December 27, 2016 the Department of Transportation (DOT) issued a traffic assessment report to the Department of City Planning on a proposed mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street. Subsequent to the release of the Draft Supplemental Environmental Impact Report (DEIR), a supplemental traffic analysis, prepared by Overland Traffic Consultants (OTC), dated March 2018, was completed to address comments submitted to the DEIR.

The proposed project that was the subject of the October 2016 traffic study, included the construction of 299 apartment units, 38,440 square-feet of office use, 3,700 square-feet of restaurant space, 2,495 square-feet of retail use, a 1,475 square-foot coffee shop, and a 18,962 square-foot park and the updated project proposal would not change the project description. The original impact analysis included a review of the proposed project both with and without the consideration of existing land-use credits. In the 2018 supplemental analysis, in order to yield the more conservative result, only the "without credit" scenario was reviewed. The supplemental analysis also considered changes to the ambient growth by extending the buildout year from 2017 to 2018, included an updated related projects list to account for cumulative impacts and, although there are no proposed changes to the project vehicular access, the supplemental analysis also included a queueing analysis of the project driveway. The project trip generation was analyzed both with existing use credits and without.

Under the original traffic analysis, it was determined that two of the twenty analyzed intersections would be significantly impacted by project related traffic and the supplemental analysis indicated the same result with only nominal changes.

#### ADDITIONAL DISTRIBUTION ANALYSIS

While the October 2016 traffic study correctly followed the trip distribution agreed upon with DOT in the Memorandum of Understanding (MOU), the supplemental analysis provided a more conservative analysis that distributed the project trips differently and analyzed the effects on three additional intersections. The analysis found that the original study findings would not change, but for one additional potential significant impact at the intersection of Sunset Boulevard and Vine Street. The proposed mitigation measures and an enhanced Transportation Demand Management (TDM) plan would mitigate this impact.

A copy of both the response to comments and the DOT original assessment letter and are attached for reference, as **Attachment 1** and **Attachment 2** respectively.

If you have any questions, please contact me at (213) 972-8482.

#### Attachments

*G:\Expedited Studies\5939 Sunset Bl\CEN14-42700\_5939 Sunset Bl MU supplemental ltr.docx*

c: Craig Bullock, Council District No. 13  
Bhuvan Bajaj, Hollywood-Wilshire District, DOT  
Taimour Tanavoli, Citywide Planning Coordination Section, DOT  
Carl Mills, Central District, BOE  
Liz Fleming, Overland Traffic Consulting

## Attachment 1

### PROPOSED MIXED-USE PROJECT AT 5939 WEST SUNSET BOULEVARD – RESPONSE TO COMMENTS

On December 27, 2016, DOT issued a traffic assessment report summarizing the findings of a traffic analysis, dated October 2016, prepared by Overland Traffic Consultants for the proposed mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street. The traffic study was prepared consistent with the City's traffic study policies and procedures, and consistent with how all traffic studies for projects within transit-oriented areas are processed in the City. On June 19, 2018, the Department of City Planning received a comment letter with questions about the study from RK Engineering Group.

The main areas of concern of the comments have to do with the trip distribution of the project trips, the need for the inclusion of a parking queueing analysis for the project driveway, and which trips were included as part of the residential street impact analysis. Overland Traffic Consultants has reviewed the comments and issued a response letter.

The October 2016 traffic study was prepared per DOT's Traffic Study Guidelines and followed the agreed upon Memorandum of Understanding (MOU) that was approved and signed prior the preparation of the traffic study. Overland Traffic Consultants thoroughly addressed the comments and has also prepared supplemental analyses to confirm the responses. DOT concurs with the response letter issued by the Overland Traffic Consultants. The response letter accurately indicated that the distribution of the trips was reasonable for the existing street system and conditions. A supplemental analysis was performed that illustrated a more conservative redistribution of the trips could create a potential significant impact at Sunset Boulevard and Vine Street. The impact would be mitigated by an enhanced Transportation Demand Management plan and the improvements already included in the study. Secondly, the response letter adequately answered the question on the driveway queueing analysis and provided a quantitative assessment of this in the supplemental analysis. Finally, the response letter's explanation of the residential street analysis provided sufficient evidence that the residential street segment analysis was prepared per DOT guidelines.

## Attachment 2


FORM GEN-100A (Rev. 1/82)

### CITY OF LOS ANGELES INTER-DEPARTMENTAL CORRESPONDENCE

5939 W Sunset Blvd  
DOT Case No. CEN 14-42700

Date: December 27, 2016

To: Karen Hoo, City Planner  
Department of City Planning

From:   
Wes Pringle, Transportation Engineer  
Department of Transportation

Subject: **TRAFFIC IMPACT STUDY FOR THE PROPOSED SUNWEST AND GORDON MIXED-USE DEVELOPMENT LOCATED AT 5929-5945 WEST SUNSET BOULEVARD AND 1512-1540 NORTH GORDON STREET**

The Department of Transportation (DOT) has reviewed the traffic analysis dated October 2016 prepared by Overland Traffic Consultants, Inc., for the proposed mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street in the Hollywood-Wilshire Community Planning Area of the City of Los Angeles. Based on DOT's traffic impact criteria<sup>1</sup>, the traffic study included the detailed analysis of twenty intersections and three neighborhood street segments, and determined that two of the study intersections would be significantly impacted by project-related traffic. The results of the traffic impact analysis, which accounted for other known development projects in evaluating potential cumulative impacts and adequately evaluated the project's traffic impacts on the surrounding community, are summarized in **Attachment 1**.

#### DISCUSSION AND FINDINGS

A. Project Description

This traffic study was conducted as part of a Draft Supplemental EIR prepared for the proposed project. The original EIR was certified by the Community Redevelopment Agency of the City of Los Angeles (CRA) in October 2007. This new traffic analysis referred to herein as the "Modified Project" evaluates proposed modifications as shown in the table below and potential significant traffic impacts with respect to the previously CRA Approved Project.

Land Use	CRA Approved Project	Modified Project
Apartments (DU)	311	299
Office (SF)	40,000	38,440
Restaurant (SF)	8,500	3,700
Retail (SF)	5,000	2,495 Retail & 1,475 Coffee Shop
Park (SF)	21,117	18,962

<sup>1</sup> Per the DOT Traffic Study Policies and Procedures, a significant impact is identified as an increase in the Critical Movement Analysis (CMA) value, due to project related traffic, of 0.01 or more when the final ("with project") Level of Service (LOS) is LOS E or F; an increase of 0.020 or more when the final LOS is LOS D; or an increase of 0.040 or more when the final LOS is LOS C.

The newly proposed Modified Project proposes to construct a mixed-use development with 299 apartment units, 38,440 square feet of office, a 3,700 square foot quality restaurant, 2,495 square feet of retail space, a 1,475 square foot coffee shop with no drive thru and an 18,962 square foot public park. The project site is currently improved with a vacant 22-story mixed-use building of approximately 319,562 square feet of floor area and a closed 18,962 square foot public park. The Modified Project will provide a total of 428 (353 residential and 75 commercial) vehicle parking spaces and a total of 401 bicycle parking spaces on-site. Vehicular access to the parking structure will be provided via a driveway on Gordon Street north of Sunset Boulevard with one inbound lane and two outbound lanes. The Modified Project is expected to be completed by 2017.

B. Trip Generation

The Modified Project's traffic impact analysis was conducted under two scenarios. The first scenario was based on net Modified Project trip generation with credits for the uses that existed on the Project Site at the time the traffic analysis was conducted for the CRA Approved Project. In order to present a more conservative estimate of potential traffic impacts, the second scenario was based on net Modified Project trip generation without credits for the prior uses that existed on the Project site. The Modified Project including credits for prior use is estimated to generate 1,410 daily vehicle trips, a net increase of 249 trips in the a.m. peak hour, and a net increase of 149 trips in the p.m. peak. The Modified Project without credits is estimated to generate 2,869 daily vehicle trips, a net increase of 254 trips in the a.m. peak hour, and a net increase of 263 trips in the p.m. peak. The trip generation estimates are based on formulas published by the Institute of Transportation Engineers (ITE) Trip Generation, 9<sup>th</sup> Edition, 2012. A copy of the trip generation tables with and without credits for prior use can be found in **Attachment 2**.

C. Traffic Impacts

The study concluded that the proposed Modified Project with or without credit for the prior site use would result in significant traffic impacts at the following two intersections:

1. **Gower Street and Sunset Boulevard** (p.m. peak hours)
2. **Bronson Avenue and Sunset Boulevard** (a.m. peak hours)

Traffic mitigation measures under the "Project Requirements" section have been proposed by the developer in order to reduce the traffic impacts at these two locations.

D. Freeway Analysis

The traffic study included a freeway impact analysis that was prepared in accordance with the State-mandated Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA). According to this analysis, the project would not result in significant traffic impacts on any of the evaluated freeway mainline segments. To comply with the Freeway Analysis Agreement executed between Caltrans and DOT in October 2013 and updated in December 2015, the project included a screening analysis to determine if additional evaluation of freeway mainline and ramp segments was



necessary beyond the CMP requirements. Exceeding one of the four screening criteria would require the applicant to work directly with Caltrans to prepare more detailed freeway analyses. However, the project did not meet or exceed any of the four thresholds defined in the agreement; therefore, no additional freeway analysis was required.

## PROJECT REQUIREMENTS

### A. Intersection Improvements

To offset the Modified Project-related significant traffic impacts at the two impacted intersections, the traffic study proposes the following operational improvements which should reduce these traffic impacts to a less than significant level as shown on **Attachment 1**:

#### 1. **Gower Street and Sunset Boulevard**

Provide an operational northbound right-turn lane on Gower Street; this would allow the northbound approach to accommodate one left-turn lane, one through lane, and one operational right-turn lane. However, this improvement would require the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard. Additionally, it would require the removal of up to three parking meters as well as the installation of additional system detector loops along the west side of Gower Street.

#### 2. **Bronson Avenue and Sunset Boulevard**

Provide an operational southbound right-turn lane on Bronson Avenue; this would allow the southbound approach to accommodate one left-turn lane, one through lane, and one operational right-turn lane. However, this improvement would require the removal of up to four parking spaces as well as the installation of additional system detector loops along the west side of Bronson Avenue.

In addition to the above mentioned intersection improvements, as a project design feature, the developer is proposing to improve both intersections with Continental Crosswalks to improve pedestrian visibility. Sunset Boulevard has been identified as part of DOT's High Injury Network (HIN) and in addition to the above mentioned intersection improvements, the developer is proposing to improve both intersections with Continental Crosswalks at both locations which may or may not require new loop detectors depending on their existing proximity to the current crosswalk. Both, DOT's Hollywood-Wilshire District Office and Council District 13 (CD-13) have agreed to lose the on street parking as long as the proposed project allocates the same number of lost public parking spaces on-site. The applicant should continue to work with DOT's Hollywood-Wilshire District Office and CD-13 to seek approval for the above mentioned improvements. All proposed improvements should be implemented by the applicant through the B-permit process of the Bureau of Engineering (BOE).

Based on DOT's current parking meter policy, payment to DOT for lost parking meter revenues is required. Please contact Mr. Ray Lau, [ray.lau@lacity.org](mailto:ray.lau@lacity.org), for

the total cost estimate of lost parking meter revenues for the removal of the proposed 3 parking meters along the west side of Gower Street. This cost must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of DOT. Costs related to any relocation of bus zones and shelters, and to modifying or upgrading traffic signal equipment and that are necessary to implement the proposed mitigations shall be incurred by the applicant. In the event the originally proposed mitigation measures become infeasible, substitute mitigation measures of an equivalent cost may be provided subject to approval by DOT, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project's significant impact.

B. Transportation Demand Management (TDM)

Consistent with City policies on sustainability and smart growth and with DOT's trip reduction and multi-modal transportation goals, the project's mitigation program first focuses on developing a trip reduction program and on solutions that promote other modes of travel. The traffic analysis has indicated that there are two intersections with significant impacts as a result of the proposed project. These traffic impacts can be significantly reduced to acceptable levels with the implementation of the above mentioned intersection improvements as well as the following TDM program:

The purpose of a TDM plan is to reduce the use of single occupant vehicles (SOV) by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. A TDM plan should include design features, transportation services, education, and incentives intended to reduce the amount of SOV during commute hours. Through strategic building design and orientation, this project can facilitate access to transit, can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of a trip-reduction program.

A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to, the following strategies:

- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator (on-site or off-site);
- Design the project to ensure a bicycle, transit, and pedestrian friendly environment;
- Provide on-site transit routing and schedule information;
- Provide rideshare matching services;
- Preferential rideshare loading/unloading or parking location;
- Provide transit and share incentives.
- Provide up to two on-site car-share spaces.



- C. Neighborhood Traffic Management (NTM) Plan  
According to the three residential street impact analysis included in the traffic study, no significant neighborhood traffic impacts were found to potentially experience adverse impacts by project related traffic. A local residential street is considered to be impacted based on an increase in the average daily traffic volumes. The objective of the residential street impact analysis is to determine the potential for cut-through traffic impacts on a residential street that can result from the project. Cut-through trips are measured as vehicles that bypass a congested arterial by instead opting to travel along a residential street.
- D. Highway Dedication and Street Widening Requirements  
On January 20, 2016, the City Council adopted the Mobility Plan 2035 which is the new Mobility Element of the General Plan. A key feature of the updated plan is to revise street standards in an effort to provide a more enhanced balance between traffic flow and other important street functions including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Per the new Mobility Element **Sunset Boulevard** has been redesignated to an Avenue I (Major Highway Class II) that would require a 35-foot half-width roadway within a 50-foot half-width right-of-way and **Gordon Street** will continue to be designated Local Street that would require an 18-foot half-width roadway within a 30-foot half-width right-of-way. The applicant should check with BOE's Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project.
- E. Construction Impacts  
DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related traffic be restricted to off-peak hours.
- F. Parking Requirements  
As previously indicated, the project would provide a total of 428 (353 residential and 75 commercial) vehicle parking spaces and a total of 401 bicycle parking spaces on-site. The developer should check with the Department of Building and Safety on the number of parking spaces needed. Additionally, the developer has agreed to set aside up to 7 on-site spaces designated for public parking to off-set the loss in street parking.
- G. Driveway Access and Circulation  
The conceptual site plan as illustrated on **Attachment 3** shows that vehicular access to the site would be provided via a single driveway along Gordon Street north of Sunset Boulevard with one inbound lane and two outbound lanes. The study also indicates that a minimum of 60 feet between the property line and the security gate will be provided for queuing. The review of this study does not constitute approval of

the proposed sub-standard driveway dimensions, access and circulation schemes. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 5th Floor, @ 213-482-7024). In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts, for driveway width and internal circulation requirements. New driveways should be Case 2 - designed with a recommended width of 30 feet for two-way operations or to the satisfaction of DOT. Delivery truck loading and unloading should take place on site with no vehicles having to back into the street.

H. Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009 and updated in 2014. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

If you have any questions, please contact Vicente Cordero at (818) 374-4697.

Attachments

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c: Chris Robertson, Council District No. 13  
Jeannie Shen, Hollywood-Wilshire District, DOT  
Taimour Tanavoli, Citywide Planning Coordination Section, DOT  
Carl Mills, Central District, BOE  
Jerry Overland, Overland Traffic Consultants, Inc.

## Attachment 1

### Volume to Capacity Ratios (v/c) and Levels of Service (LOS) 5939 West Sunset Boulevard

Table 10a  
Future Plus Modified Project Traffic Conditions.  
Analysis with Credits for Prior Uses

No.	Intersection	Peak Hour	Future (2017) Without Project		Future (2017) With Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	Cahuenga Bl & Franklin Av	AM	1.026	F	1.028	F	+ 0.002	NO
		PM	0.880	D	0.881	D	+ 0.001	NO
2	Cahuenga Bl & Hollywood Bl	AM	0.887	D	0.892	D	+ 0.005	NO
		PM	0.811	D	0.814	D	+ 0.003	NO
3	Cahuenga Bl & Sunset Bl	AM	0.805	D	0.809	D	+ 0.004	NO
		PM	0.829	D	0.835	D	+ 0.006	NO
4	Vine St & Hollywood Bl	AM	0.798	C	0.800	D	+ 0.002	NO
		PM	0.768	C	0.769	C	+ 0.001	NO
5	Vine St & Sunset Bl	AM	0.827	D	0.832	D	+ 0.005	NO
		PM	0.929	E	0.933	E	+ 0.004	NO
6	Vine St & Fountain Av	AM	0.749	C	0.752	C	+ 0.003	NO
		PM	0.819	D	0.821	D	+ 0.002	NO
7	Vine St & Santa Monica Bl	AM	0.907	E	0.911	E	+ 0.004	NO
		PM	0.923	E	0.925	E	+ 0.002	NO
8	Gower St & Franklin Av	AM	0.656	B	0.656	B	+ 0.000	NO
		PM	0.747	C	0.749	C	+ 0.002	NO
9	Gower St & Hollywood Bl	AM	0.755	C	0.763	C	+ 0.008	NO
		PM	0.743	C	0.748	C	+ 0.005	NO
10	Gower St & Sunset Bl	AM	0.747	C	0.762	C	+ 0.015	NO
		PM	0.916	E	0.926	E	+ 0.010	YES

**Attachment 1 (cont'd)**  
**Volume to Capacity Ratios (v/c) and Levels of Service (LOS)**  
**5939 West Sunset Boulevard**

Table 10a (continued)  
 Future Plus Modified Project Traffic Conditions  
 Analysis With Credits for Prior Uses

<u>No.</u>	<u>Intersection</u>	<u>Peak Hour</u>	<u>Future (2017)</u> <u>Without Project</u>		<u>Future (2017)</u> <u>With Project</u>			<u>Significant Impact</u>
			<u>CMA</u>	<u>LOS</u>	<u>CMA</u>	<u>LOS</u>	<u>Impact</u>	
11	Gower St & Fountain Av	AM	0.729	C	0.739	C	+ 0.010	NO
		PM	0.886	D	0.889	D	+ 0.003	NO
12	Gower St & Santa Monica Bl	AM	0.798	C	0.807	D	+ 0.009	NO
		PM	0.903	E	0.907	E	+ 0.004	NO
13A	Gordon St (west)	AM	0.635	B	0.655	B	+ 0.020	NO
	Sunset Bl	PM	0.528	A	0.537	A	+ 0.009	NO
13B	Gordon St (east)	AM	0.424	A	0.540	A	+ 0.116	NO
	Sunset Bl	PM	0.468	A	0.505	A	+ 0.037	NO
14	Bronson Av & Hollywood Bl	AM	0.722	C	0.725	C	+ 0.003	NO
		PM	0.679	B	0.694	B	+ 0.015	NO
15	Bronson Av & Sunset Bl	AM	0.833	D	0.859	D	+ 0.026	YES
		PM	0.827	D	0.833	D	+ 0.006	NO
16	Bronson Av & Santa Monica Bl	AM	0.572	A	0.581	A	+ 0.009	NO
		PM	0.539	A	0.544	A	+ 0.005	NO
17	101 Fwy SB Ran	AM	0.682	B	0.685	B	+ 0.003	NO
	Hollywood Bl	PM	0.515	A	0.522	A	+ 0.007	NO
18	101 Fwy NB Ran	AM	0.612	B	0.627	B	+ 0.015	NO
	Hollywood Bl	PM	0.584	A	0.592	A	+ 0.008	NO
19	Van Ness Av & Sunset Bl	AM	0.653	B	0.659	B	+ 0.006	NO
		PM	0.741	C	0.746	C	+ 0.005	NO
20	Wilton Pl & Sunset Bl	AM	0.651	B	0.664	B	+ 0.013	NO
		PM	0.699	B	0.702	C	+ 0.003	NO

**Attachment 1 (cont'd)**  
**Volume to Capacity Ratios (v/c) and Levels of Service (LOS)**  
**5939 West Sunset Boulevard**

Table 10b  
 Future Plus Modified Project Traffic Conditions  
 Analysis Without Credits For Prior Uses

<u>No.</u>	<u>Intersection</u>	<u>Peak Hour</u>	<u>Future (2017)</u> <u>Without Project</u>		<u>Future (2017)</u> <u>With Project</u>			<u>Significant</u> <u>Impact</u>
			<u>CMA</u>	<u>LOS</u>	<u>CMA</u>	<u>LOS</u>	<u>Impact</u>	
1	Cahuenga Bl &	AM	1.026	F	1.028	F	+ 0.002	NO
	Franklin Av	PM	0.880	D	0.883	D	+ 0.003	NO
2	Cahuenga Bl &	AM	0.887	D	0.892	D	+ 0.005	NO
	Hollywood Bl	PM	0.811	D	0.817	D	+ 0.006	NO
3	Cahuenga Bl &	AM	0.805	D	0.809	D	+ 0.004	NO
	Sunset Bl	PM	0.829	D	0.840	D	+ 0.011	NO
4	Vine St &	AM	0.798	C	0.800	D	+ 0.002	NO
	Hollywood Bl	PM	0.768	C	0.771	C	+ 0.003	NO
5	Vine St &	AM	0.827	D	0.832	D	+ 0.005	NO
	Sunset Bl	PM	0.929	E	0.938	E	+ 0.009	NO
6	Vine St &	AM	0.749	C	0.752	C	+ 0.003	NO
	Fountain Av	PM	0.819	D	0.823	D	+ 0.004	NO
7	Vine St &	AM	0.907	E	0.911	E	+ 0.004	NO
	Santa Monica Bl	PM	0.923	E	0.927	E	+ 0.004	NO
8	Gower St &	AM	0.656	B	0.656	B	+ 0.000	NO
	Franklin Av	PM	0.747	C	0.752	C	+ 0.005	NO
9	Gower St &	AM	0.755	C	0.763	C	+ 0.008	NO
	Hollywood Bl	PM	0.743	C	0.753	C	+ 0.010	NO
10	Gower St &	AM	0.747	C	0.762	C	+ 0.015	NO
	Sunset Bl	PM	0.916	E	0.935	E	+ 0.019	YES

**Attachment 1 (cont'd)**  
**Volume to Capacity Ratios (v/c) and Levels of Service (LOS)**  
**5939 West Sunset Boulevard**

Table 10b (continued)  
 Future Plus Modified Project Traffic Conditions  
 Analysis Without Credit For Prior Uses

<u>No.</u>	<u>Intersection</u>	<u>Peak</u> <u>Hour</u>	<u>Future (2017)</u> <u>Without Project</u>		<u>Future (2017)</u> <u>With Project</u>			<u>Significant</u> <u>Impact</u>
			<u>CMA</u>	<u>LOS</u>	<u>CMA</u>	<u>LOS</u>	<u>Impact</u>	
11	Gower St & Fountain Av	AM PM	0.729 0.886	C D	0.740 0.893	C D	+ 0.011 + 0.007	NO NO
12	Gower St & Santa Monica Bl	AM PM	0.798 0.903	C E	0.807 0.911	D E	+ 0.009 + 0.008	NO NO
13A	Gordon St (west) Sunset Bl	AM PM	0.635 0.528	B A	0.655 0.543	B A	+ 0.020 + 0.015	NO NO
13B	Gordon St (east) Sunset Bl	AM PM	0.424 0.468	A A	0.543 0.534	A A	+ 0.119 + 0.066	NO NO
14	Bronson Av & Hollywood Bl	AM PM	0.722 0.679	C B	0.725 0.706	C C	+ 0.003 + 0.027	NO NO
15	Bronson Av & Sunset Bl	AM PM	0.833 0.827	D D	0.860 0.838	D D	+ 0.027 + 0.011	YES NO
16	Bronson Av & Santa Monica Bl	AM PM	0.572 0.539	A A	0.581 0.548	A A	+ 0.009 + 0.009	NO NO
17	101 Fwy SB Ran Hollywood Bl	AM PM	0.682 0.515	B A	0.685 0.527	B A	+ 0.003 + 0.012	NO NO
18	101 Fwy NB Ran Hollywood Bl	AM PM	0.612 0.584	B A	0.628 0.598	B A	+ 0.016 + 0.014	NO NO
19	Van Ness Av & Sunset Bl	AM PM	0.653 0.741	B C	0.659 0.750	B C	+ 0.006 + 0.009	NO NO
20	Wilton Pl & Sunset Bl	AM PM	0.651 0.699	B B	0.665 0.704	B C	+ 0.014 + 0.005	NO NO

## Attachment 1 (cont'd)

### Volume to Capacity Ratios (v/c) and Levels of Service (LOS) 5939 West Sunset Boulevard

Table 18a  
CMA Summary with Mitigation  
Modified Project Analysis With Credits For Prior Uses

<u>No.</u>	<u>Intersection</u>	<u>Peak</u>	<u>Future (2017)</u>		<u>Future (2017)</u>			<u>Future (2017)</u>			<u>Significant</u>	
			<u>Without Project</u>		<u>With Project</u>			<u>With Mitigation</u>				
	<u>Hour</u>	<u>CMA</u>	<u>LOS</u>	<u>CMA</u>	<u>LOS</u>	<u>Impact</u>	<u>Impact</u>	<u>CMA</u>	<u>LOS</u>	<u>Impact</u>	<u>Impact</u>	
10	Gower St & Sunset Bl	AM	0.747	C	0.762	C	+ 0.015	NO	0.744	C	-0.003	NO
		PM	0.916	E	0.926	E	+ 0.010	YES	0.862	D	-0.054	NO
15	Bronson Av & Sunset Bl	AM	0.833	D	0.859	D	+ 0.026	YES	0.717	C	-0.116	NO
		PM	0.827	D	0.833	D	+ 0.006	NO	0.833	D	+ 0.006	NO

Table 18b  
CMA Summary with Mitigation  
Modified Project Analysis Without Credits For Prior Uses

<u>No.</u>	<u>Intersection</u>	<u>Peak</u>	<u>Future (2017)</u>		<u>Future (2017)</u>			<u>Future (2017)</u>			<u>Significant</u>	
			<u>Without Project</u>		<u>With Project</u>			<u>With Mitigation</u>				
	<u>Hour</u>	<u>CMA</u>	<u>LOS</u>	<u>CMA</u>	<u>LOS</u>	<u>Impact</u>	<u>Impact</u>	<u>CMA</u>	<u>LOS</u>	<u>Impact</u>	<u>Impact</u>	
10	Gower St & Sunset Bl	AM	0.747	C	0.762	C	+ 0.015	NO	0.744	C	-0.003	NO
		PM	0.916	E	0.935	E	+ 0.019	YES	0.862	D	-0.054	NO
15	Bronson Av & Sunset Bl	AM	0.833	D	0.860	D	+ 0.027	YES	0.718	C	-0.115	NO
		PM	0.827	D	0.838	D	+ 0.011	NO	0.837	D	+ 0.010	NO

## Attachment 2

### Project Trip Generation Estimates 5939 West Sunset Boulevard

Table 2a  
Estimated Modified Project Traffic Generation  
Modified Project Analysis With Prior Use Credits

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
<b>Proposed Project</b>								
Apartment	299 units	1,988	152	30	122	185	120	65
Transit	10%	(199)	(15)	(3)	(12)	(19)	(12)	(7)
Subtotal Apartment		1,789	137	27	110	166	108	58
Office	38,440 sf	424	60	53	7	57	10	47
Transit	10%	(42)	(6)	(5)	(1)	(6)	(1)	(5)
Subtotal Office		382	54	48	6	51	9	42
Community Serving Retail	2,495 sf	107	2	1	1	9	4	5
Transit	10%	(11)	(0)	(0)	(0)	(1)	(0)	(1)
Internal Trips	10%	(10)	(0)	(0)	0	(1)	(0)	(1)
Pass-By	50%	(43)	(1)	(0)	(1)	(4)	(2)	(2)
Subtotal Retail		43	1	1	0	3	2	1
Quality Restaurant	3,700 sf	333	3	2	1	28	19	9
Transit	10%	(33)	(0)	(0)	(0)	(3)	(2)	(1)
Internal Trips	10%	(30)	(0)	(0)	(0)	(3)	(2)	(1)
Pass-By	10%	(27)	(0)	(0)	(0)	(2)	(1)	(1)
Subtotal Restaurant		243	3	2	1	20	14	6
Coffee Shop-No Drive Thru	1,475 sf	1,100	160	82	78	60	30	30
Transit	10%	(110)	(16)	(8)	(8)	(6)	(3)	(3)
Internal Trips	20%	(198)	(29)	(15)	(14)	(11)	(5)	(6)
Pass-By	50%	(396)	(58)	(30)	(28)	(22)	(11)	(11)
Subtotal Coffee Shop		396	57	29	28	21	11	10
Public Park	18,962 sf	18	2	1	1	2	1	1
Transit	10%	(2)	(0)	(0)	(0)	(0)	(0)	(0)
Subtotal Park		16	2	1	1	2	1	1
<b>Subtotal Proposed</b>		<b>2,869</b>	<b>254</b>	<b>108</b>	<b>146</b>	<b>263</b>	<b>145</b>	<b>118</b>
<b>Prior Use Removed</b>								
HTO Restaurant (no breakfast)	15,252 sf	1,939	0	0	0	150	90	60
Transit	10%	(194)	0	0	0	(15)	(9)	(6)
Pass-by	20%	(349)	0	0	0	(27)	(16)	(11)
Apartment	8 units	53	4	1	3	5	3	2
Single Family Home	1 unit	10	1	0	1	1	0	1
<b>Subtotal Prior Uses</b>		<b>1,459</b>	<b>5</b>	<b>1</b>	<b>4</b>	<b>114</b>	<b>68</b>	<b>46</b>
<b>NET TRIPS (Proposed - Prior)</b>		<b>1,410</b>	<b>249</b>	<b>107</b>	<b>142</b>	<b>149</b>	<b>77</b>	<b>72</b>



**Attachment 2 (cont'd)**  
**Project Trip Generation Estimates**  
**5939 West Sunset Boulevard**

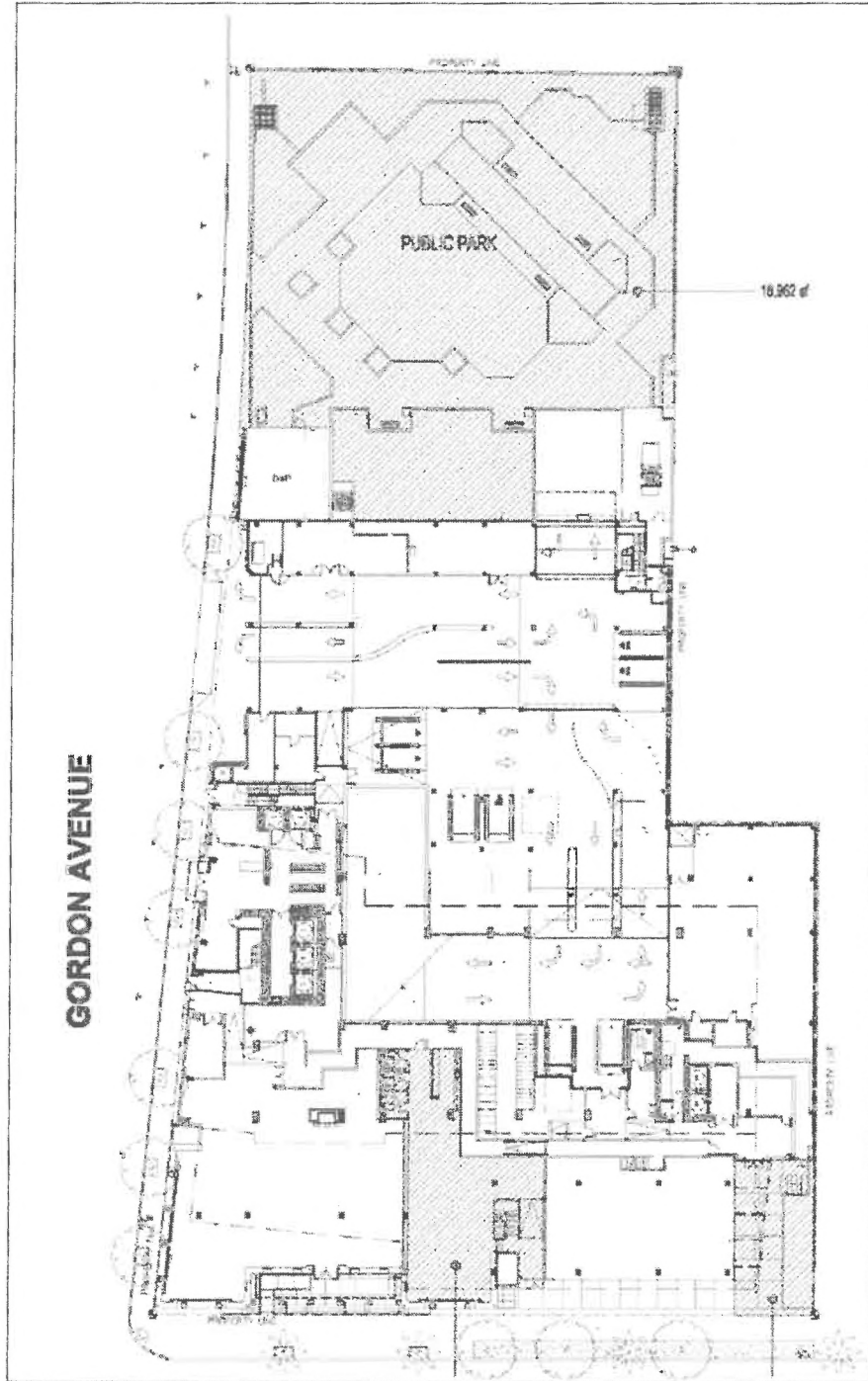
Table 2b  
 Estimated Modified Project Traffic Generation  
 Modified Project Analysis Without Credits For Prior Uses

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
<b>Proposed Project</b>								
Apartment	299 units	1,988	152	30	122	185	120	65
Transit	10%	(199)	(15)	(3)	(12)	(19)	(12)	(7)
Subtotal Apartment		1,789	137	27	110	166	108	58
Office	38,440 sf	424	60	53	7	57	10	47
Transit	10%	(42)	(6)	(5)	(1)	(6)	(1)	(5)
Subtotal Office		382	54	48	6	51	9	42
Community Serving Retail	2,495 sf	107	2	1	1	9	4	5
Transit	10%	(11)	(0)	(0)	(0)	(1)	(0)	(1)
Internal Trips	10%	(10)	(0)	(0)	0	(1)	(0)	(1)
Pass-By	50%	(43)	(1)	(0)	(1)	(4)	(2)	(2)
Subtotal Retail		43	1	1	0	3	2	1
Quality Restaurant	3,700 sf	333	3	2	1	28	19	9
Transit	10%	(33)	(0)	(0)	(0)	(3)	(2)	(1)
Internal Trips	10%	(30)	(0)	(0)	(0)	(3)	(2)	(1)
Pass-By	10%	(27)	(0)	(0)	(0)	(2)	(1)	(1)
Subtotal Restaurant		243	3	2	1	20	14	6
Coffee Shop-No Drive Thru	1,475 sf	1,100	160	82	78	60	30	30
Transit	10%	(110)	(16)	(8)	(8)	(6)	(3)	(3)
Internal Trips	20%	(198)	(29)	(15)	(14)	(11)	(5)	(6)
Pass-By	50%	(396)	(58)	(30)	(28)	(22)	(11)	(11)
Subtotal Coffee Shop		396	57	29	28	21	11	10
Public Park	18,962 sf	18	2	1	1	2	1	1
Transit	10%	(2)	(0)	(0)	(0)	(0)	(0)	(0)
Subtotal Park		16	2	1	1	2	1	1
<b>Total Proposed</b>		<b>2,869</b>	<b>254</b>	<b>108</b>	<b>146</b>	<b>263</b>	<b>145</b>	<b>118</b>

# Attachment 3

## Conceptual Site Plan

### 5939 West Sunset Boulevard



**SUNSET BOULEVARD**

**Sunset & Gordon Mixed-Use Project (CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR)  
(VTT-74172) (ENV-2015-1923-EIR)**

Jennifer.Roy@lw.com <Jennifer.Roy@lw.com>  
To: Zina.Cheng@lacity.org, mindy.nguyen@lacity.org  
Cc: DJ.Moore@lw.com, Roopika.Subramanian@lw.com

Tue, Oct 30, 2018 at 11:43 AM

Good morning,

Please see the attached correspondence concerning the Sunset & Gordon Mixed-Use Project (CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR) (VTT-74172) (ENV-2015-1923-EIR), Council File No. 08-1509-S3. This matter is scheduled to be heard at the November 6, 2018, Planning and Land Use Management Committee meeting.

Best,

Jennifer

**Jennifer K. Roy**

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 **SG\_VMTMemo\_10-24-18.pdf**  
474K



## TECHNICAL MEMORANDUM

Date: October 24, 2018  
To: Mindy Nguyen, City of Los Angeles Planning Department  
From: Tom Gaul  
**Subject: VMT Analysis for Sunset & Gordon Mixed-Use Project**

Ref: 2850

This document summarizes an assessment of vehicle miles traveled (VMT) generated by the proposed Sunset & Gordon Mixed Use Project (the "Modified Project") located at 5929-5945 Sunset Boulevard and 1512-1540 North Gordon Street in the City of Los Angeles. The Modified Project is the subject of a Supplemental Environmental Impact Report (SEIR)<sup>1</sup> and Final Environmental Impact Report (FEIR)<sup>2</sup>, and its traffic impacts were evaluated in a traffic study prepared by Overland Traffic Consultants<sup>3</sup>.

On September 27, 2013, Governor Jerry Brown signed Senate Bill 743 into law and started a process that will fundamentally change transportation impact analysis conducted as part of California Environmental Quality Act (CEQA) compliance. The Governor's Office of Planning and Research (OPR) was charged with developing new guidelines for evaluating transportation impacts under CEQA using methods that no longer focus on measuring automobile delay and level of service. This change at the state level recognizes the unintended consequences of using LOS as an impact metric, which results in understating potential transportation impacts in greenfield areas and discouraging more sustainable infill projects and alternative transportation projects. SB 743 directed agencies to develop new guidelines that develop a transportation performance metric that can help promote: the reduction of greenhouse gas emissions, the development of multimodal networks, and a more sustainable diversity of land uses.

OPR issued proposed updates to the CEQA guidelines in support of these goals in November 2017.<sup>4</sup> The proposed updates established vehicle miles traveled as the primary metric for evaluating a project's environmental impacts on the transportation system. The State of California Natural Resources Agency is currently engaged in a rulemaking process to formalize the OPR's proposed guidance.

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<sup>1</sup> City of Los Angeles Department of City Planning, *Draft Supplemental Environmental Impact Report, Sunset and Gordon Mixed-Use Project*, August 2017.

<sup>2</sup> City of Los Angeles Department of City Planning, *Sunset & Gordon Final Supplemental Environmental Impact Report*, May 2018.

<sup>3</sup> Overland Traffic Consultants, Inc., *Traffic Impact Analysis for Sunset & Gordon Mixed-Use*, October 2016; Overland Traffic Consultants, Inc., *Sunset & Gordon Mixed-Use Project Supplemental Traffic Analysis*, March 2018.

<sup>4</sup> State of California, Governor's Office of Planning and Research, *Proposed Updates to the CEQA Guidelines, Final*, November 2017.



The City of Los Angeles embarked on a parallel process to revise its significance thresholds for transportation impacts to be based on VMT and to revise its transportation impact assessment processes and guidelines accordingly. As part of this process, the City is also developing a VMT Calculator tool to be used to assess the VMT impacts of proposed development projects within the City. The VMT Calculator also assesses the effectiveness of selected transportation demand management (TDM) measures proposed for a project based on available research.

The City is currently engaged in this process and has not yet adopted its updated transportation significance thresholds or its updated transportation impact analysis procedures. However, the City has prepared draft VMT analysis procedures and the associated VMT Calculator for beta testing. Accordingly, an analysis was conducted for the Modified Project using the City's draft VMT analysis procedures and VMT Calculator. This analysis considered both the Modified Project's proposed land uses and the enhanced TDM Plan proposed as part of the Modified Project.

Figure 1 presents the City's VMT Calculator dashboard as analyzed for the Sunset & Gordon Modified Project. As indicated, with implementation of the TDM Plan, the Modified Project would not have a significant impact on either household VMT per capita or work VMT per employee as estimated by the VMT Calculator.

As noted previously, the City's revised VMT analysis procedures and the VMT Calculator are currently in draft form. Thus, they are subject to change. However, the analysis conducted demonstrates that under current VMT methodology being evaluated by the City, the Modified Project – which is an infill development in an area well-served by transit – would result in less than significant transportation impacts.

# CITY OF LOS ANGELES VMT CALCULATOR Version 1.0



## Project Information

Project: Sunset & Gordon Mixed-Use Project (30 Affordable)  
 Scenario: TG 9/21/18  
 Address: 1512 N GORDON ST, 90028



Land Use Type	Value	Unit
Office   General Office	38.44	ksf
Housing   Multi-Family	269	DU
Retail   General Retail	2.495	ksf
Retail   Fast-Food Restaurant	1.475	ksf
Retail   Quality Restaurant	3.7	ksf
Office   General Office	38.44	ksf
Housing   Affordable Housing - Family	30	DU

Click here to add a single custom land use type (will be included in the above list)

## TDM Strategies

Select each section to show individual strategies  
 Use  to denote if the TDM strategy is proposed part of the project or is a mitigation strategy

**A Parking**

Reduce Parking Supply:  Proposed Proj  Mitigation. Value: 100 (city code parking provision for the project site), 74 (actual parking provision for the project site)

Unbundle Parking:  Proposed Proj  Mitigation. Value: 150 (monthly parking cost (dollar) for the project site)

Parking Cash-Out:  Proposed Proj  Mitigation. Value: 25 (percent of employees eligible)

Price Workplace Parking:  Proposed Proj  Mitigation. Value: 6.00 (daily parking charge (dollar)), 25 (percent of employees subject to priced parking)

Residential Area Parking Permits:  Proposed Proj  Mitigation. Value: 200 (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
<b>1,733</b> Daily Vehicle Trips	<b>1,443</b> Daily Vehicle Trips
<b>10,651</b> Daily VMT	<b>8,910</b> Daily VMT
<b>6.9</b> Household VMT per Capita	<b>5.2</b> Household VMT per Capita
<b>8.1</b> Work VMT per Employee	<b>7.0</b> Work VMT per Employee
<b>Significant VMT impact?</b>	
<b>Household: Yes</b> Threshold = 5.0 15% Below APC	<b>Household: No</b> Threshold = 8.0 15% Below APC
<b>Work: Yes</b> Threshold = 7.6 15% Below APC	<b>Work: No</b> Threshold = 7.6 15% Below APC



Figure 1  
 VMT Calculator Analysis for Sunset & Gordon Modified Project