

**DEPARTMENT OF
CITY PLANNING**

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

VAHID KHORSAND
VICE-PRESIDENT

DAVID H. J. AMBROZ
CAROLINE CHOE

RENEE DAKE WILSON
KAREN MACK
MARC MITCHELL
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES
COMMISSION OFFICE MANAGER
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP
DIRECTOR

(213) 978-1271

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER
(213) 978-1272

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

<http://planning.lacity.org>

December 4, 2018

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

CASE NOS. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR AND VTT-74172-1A, LOCATED AT 5929-5945 WEST SUNSET BOULEVARD AND 1512-1540 NORTH GORDON STREET; CF 08-1509-S2 / 08-1509-S3

Planning staff respectfully requests your consideration of the following technical modifications to the recommendation for Case Nos. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR and VTT-74172-1A. These technical modifications are in addition to the technical modifications dated November 5, 2018.

On August 9, 2018, the City Planning Commission considered an appeal of Case No. VTT-74172-1A for a Vesting Tentative Tract Map to permit the merger and re-subdivision of nine lots to create one master lot and one airspace lot, and the limited dedication and merger of Gordon Street below grade at a width of four feet and depth of 48.33 feet, approximately 0.3 feet below the finished grade of the public sidewalk; and Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR for the development of 299 residential units, including 269 market rate units, 15 affordable housing units at the Very Low Income level (5 percent of total units) and 15 units for workforce housing; approximately 46,110 square feet of commercial space comprised of 38,440 square feet of office space, approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor community serving retail space (including up to a 1,475 square-foot coffee shop); and an approximately 18,962 square-foot public park on the north side of the project site along Gordon Street. In total, the project will contain approximately 324,693 square feet of floor area; and include a 22-story structure consisting of an 18-floor residential tower above a four-level above-grade podium structure. The project will provide approximately 508 parking spaces within the three levels of subterranean parking and three levels of above-grade parking that are currently developed on the project site, and no additional construction would be required to provide parking within the project to meet Los Angeles Municipal Code (LAMC) requirements, in conjunction with the approval of a Zone Change Ordinance that would allow for the reduction

of clear space at structural elements in the project's parking structure and up to 66 percent of the parking stalls to be compact parking stalls.

At that meeting, the City Planning Commission denied the appeal, and approved the proposed project, including a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed 3,700 square-foot ground floor restaurant; an On-Menu Incentive for a 20 percent decrease in the total required amount of usable open space, in conjunction with Parking Option One; and a Site Plan Review for a project which creates, or results in an increase of, 50 or more dwelling units; and recommended that the City Council approve a Resolution for a General Plan Amendment to the 1988 Hollywood Community Plan to re-designate the portion of the project site located at 1528-1540 North Gordon Street (Lots 17, 18, and 19 of Bagnoli Tract No. Two), from High Medium Residential to Regional Center Commercial, a draft Ordinance effectuating a Vesting Zone Change and Height District Change from (T)(Q)C2-2D-SN to (T)(Q)C2-2D-SN, and (T)(Q)R4-1VL to (T)(Q)C2 2D, subject to conditions that would permit a total allowable floor area for the entire project site of approximately 324,693 square feet, 299 dwelling units, and building height of approximately 250 feet (22 stories), including Q Conditions to permit for the reduction of clear space at structural elements in the project's parking structure and to allow up to 66 percent of the parking stalls to be compact parking stalls.

On September 7, 2018, a second level appeal of Case No. VTT-74172-1A, and first level appeal of the Conditional Use Permit and Site Plan Review entitlements of the related to Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR were filed and are pending final decision by the City Council.

The following technical corrections are requested for your consideration to provide clarifying statements regarding transportation impacts, and are unrelated to the pending appeals. Added text is shown in underline.

Corrections to Letter of Determination for Case No. VTT-74172-1A

Clarification of CEQA Findings, pages 181, 182, 188

The following should be added to the CEQA Findings in order to further clarify that a supplemental traffic evaluation and a vehicle miles traveled (VMT) analysis, provided voluntarily by the applicant for informational purposes, conclude that the project's transportation impacts would be less than significant prior to mitigation and further reduced with mitigation, and the project would not have a significant transportation using the VMT methodology:

Last paragraph, page 181

The Future Plus Modified Project Traffic Conditions Analysis indicates that for the A.M. peak hour, the addition of Modified Project traffic could significantly impact one intersection in the A.M. peak hour during the future (2017 or 2018) conditions: Bronson Avenue and Sunset Boulevard. The Future Plus Modified Project Traffic Conditions Analysis indicates that for the P.M. peak hour, the addition of Modified Project traffic could significantly impact one intersection in the P.M. peak hour during the future (2017 or 2018) conditions: Gower Street and Sunset Boulevard. In addition, as part of the Final Supplemental EIR an additional distribution analysis was conducted which determined that the intersection of Vine

Street and Sunset Boulevard could be significantly impacted by Modified Project traffic during the P.M. Peak Hour. A subsequent supplemental traffic evaluation provided for informational purposes by Overland Traffic Consultants, Inc. (October 18, 2018), demonstrates that, when assessed using the Institute of Traffic Engineers' Trip Generation Manual (10th Edition), which is current best practices for transportation engineering, the intersection of Vine Street and Sunset Boulevard would not be significantly impacted by Modified Project traffic, even without mitigation. LADOT concurred with this findings in a letter dated November 5, 2018.

Last paragraph, page 182

Mitigation Measure MM K.1-3 would provide a Transportation Demand Management (TDM) Plan at the Modified Project that incorporates enhanced measures to achieve a reduction in the Modified Project's vehicle trips by 10 percent during the P.M. Peak Hour, which would be more than sufficient to ensure that the Vine Street and Sunset Boulevard intersection would be mitigated to a level such that the intersection would not be significantly impacted by Modified Project traffic. Further, as described above, pursuant to the updated analysis provided for informational purposes in the Overland Traffic Consultants October 18, 2018, supplemental traffic evaluation, the Modified Project would not have a significant impact on the intersection of Vine Street and Sunset Boulevard, even without mitigation, when assessed using the Institute of Traffic Engineers' Trip Generation Manual (10th Edition). LADOT concurred with this finding in a letter dated November 5, 2018. Nevertheless, the Supplemental EIR conservatively requires implementation of the TDM Plan to reduce potential transportation impacts, and therefore the TDM Plan will be implemented pursuant to Mitigation Measure MM K.1-3.

New Section before "2. Project Design Features," page 188

Senate Bill 713 (2013) directs agencies to develop new guidelines that develop a transportation performance metric based on vehicle miles traveled (VMT). Although the City has not yet adopted significance thresholds for transportation impacts to be based on VMT, it has embarked on a process to revise its transportation impact assessment processes and guidelines accordingly and has prepared draft VMT analysis procedures and a draft VMT Calculator. Fehr & Peers prepared a VMT analysis for the Modified Project (October 24, 2018) for informational purposes based on these draft procedures and materials, which considered both the Modified Project's proposed land uses and the TDM Plan proposed as part of the Modified Project. The analysis shows that, with implementation of the Mitigation Measure MM K.1-3 (TDM Plan), the Modified Project would not have a significant impact

on either household VMT per capita or work VMT per employee. LADOT concurred with this finding in a letter dated November 5, 2018. Thus, while the City has not adopted VMT processes and guidelines to evaluate transportation impacts, under the City's draft VMT procedures and thresholds, transportation impacts would be less than significant with mitigation. Therefore, the conclusions provided using VMT are consistent with the conclusions in the Supplemental EIR's transportation analysis; i.e., potential impacts would be less than significant with mitigation.

Corrections to Letter of Determination for Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR

Clarification of General Plan Text Finding, page F-4

The following should be added to the first full paragraph of page F-4 in order to further clarify that the project will include a Transportation Demand Management Plan to reduce transportation impact; and that a supplemental traffic evaluation and a vehicle miles traveled (VMT) analysis, provided voluntarily by the applicant for informational purposes, conclude that the project's transportation impacts would be less than significant prior to mitigation and further reduced with mitigation, and the project would not have a significant transportation using the VMT methodology:

The project's location in a transit rich corridor and in close proximity to employment, retail, restaurants, and entertainment will promote the use of transit and pedestrian trips in lieu of vehicular trips. Prospective residential and commercial tenants will have increased opportunities to access alternate modes of transportation, which will contribute to the goal of reducing traffic congestion and improving air quality. The project will include implementation of a Transportation Demand Management Plan (TDM Plan) approved by LADOT, which will further reduce the Project's vehicle trips. With implementation of the TDM Plan, the project will not result in any significant transportation impacts. Further, a supplemental traffic evaluation provided for informational purposes by Overland Traffic Consultants, Inc. (October 18, 2018) confirms that the project's transportation impacts were conservatively analyzed in the Supplemental EIR and would be even less when assessed using the Institute of Traffic Engineer's Trip General Manual (10th Edition), which is current best practices for transportation engineering. In addition, a vehicle miles traveled (VMT) analysis conducted by Fehr & Peers (October 24, 2018) using the City's draft VMT Calculator and provided for informational purposes, shows that, with implementation of the TDM Plan, the project would not have any significant transportation impacts using that methodology. On November 5, 2018, LADOT provided a review of the Overland Traffic Consultants October 18, 2018 analysis and the Fehr & Peers October 24, 2018, analysis. LADOT's review confirms that LADOT concurs with the analyses' conclusions that: (1) the project impacts to the study intersections and roadway segments analyzed would be less

than significant prior to mitigation and the project impacts would be further reduced with mitigation; and (2) the project would not have a significant transportation impact using the City's VMT methodology. [...]

Clarification of CEQA Findings, pages F-150, F-155

The following should be added to the CEQA Findings in order to further clarify that a supplemental traffic evaluation and a vehicle miles traveled (VMT) analysis, provided voluntarily by the applicant for informational purposes, conclude that the project's transportation impacts would be less than significant prior to mitigation and further reduced with mitigation, and the project would not have a significant transportation using the VMT methodology:

First full paragraph, page F-150

The Future Plus Modified Project Traffic Conditions Analysis indicates that for the A.M. peak hour, the addition of Modified Project traffic could significantly impact one intersection in the A.M. peak hour during the future (2017 or 2018) conditions: Bronson Avenue and Sunset Boulevard. The Future Plus Modified Project Traffic Conditions Analysis indicates that for the P.M. peak hour, the addition of Modified Project traffic could significantly impact one intersection in the P.M. peak hour during the future (2017 or 2018) conditions: Gower Street and Sunset Boulevard. In addition, as part of the Final Supplemental EIR an additional distribution analysis was conducted which determined that the intersection of Vine Street and Sunset Boulevard could be significantly impacted by Modified Project traffic during the P.M. Peak Hour. **A subsequent supplemental traffic evaluation provided for informational purposes by Overland Traffic Consultants, Inc. (October 18, 2018), demonstrates that, when assessed using the Institute of Traffic Engineers' Trip Generation Manual (10th Edition), which is current best practices for transportation engineering, the intersection of Vine Street and Sunset Boulevard would not be significantly impacted by Modified Project traffic, even without mitigation. LADOT concurred with this findings in a letter dated November 5, 2018.**

Last paragraph, page F-150

Mitigation Measure MM K.1-3 would provide a Transportation Demand Management (TDM) Plan at the Modified Project that incorporates enhanced measures to achieve a reduction in the Modified Project's vehicle trips by 10 percent during the P.M. Peak Hour, which would be more than sufficient to ensure that the Vine Street and Sunset Boulevard intersection would be mitigated to a level such that the intersection would not be significantly impacted by Modified Project traffic. **Further, as described above, pursuant to the updated analysis provided for informational purposes in the Overland Traffic Consultants October 18, 2018, supplemental traffic evaluation, the Modified Project would not have a significant impact on the intersection of Vine Street and**

Sunset Boulevard, even without mitigation, when assessed using the Institute of Traffic Engineers' Trip Generation Manual (10th Edition). LADOT concurred with this finding in a letter dated November 5, 2018. Nevertheless, the Supplemental EIR conservatively requires implementation of the TDM Plan to reduce potential transportation impacts, and therefore the TDM Plan will be implemented pursuant to Mitigation Measure MM K.1-3.

New Section before "2. Project Design Features," page F-155

Senate Bill 713 (2013) directs agencies to develop new guidelines that develop a transportation performance metric based on vehicle miles traveled (VMT). Although the City has not yet adopted significance thresholds for transportation impacts to be based on VMT, it has embarked on a process to revise its transportation impact assessment processes and guidelines accordingly and has prepared draft VMT analysis procedures and a draft VMT Calculator. Fehr & Peers prepared a VMT analysis for the Modified Project (October 24, 2018) for informational purposes based on these draft procedures and materials, which considered both the Modified Project's proposed land uses and the TDM Plan proposed as part of the Modified Project. The analysis shows that, with implementation of the Mitigation Measure MM K.1-3 (TDM Plan), the Modified Project would not have a significant impact on either household VMT per capita or work VMT per employee. LADOT concurred with this finding in a letter dated November 5, 2018. Thus, while the City has not adopted VMT processes and guidelines to evaluate transportation impacts, under the City's draft VMT procedures and thresholds, transportation impacts would be less than significant with mitigation. Therefore, the conclusions provided using VMT are consistent with the conclusions in the Supplemental EIR's transportation analysis; i.e., potential impacts would be less than significant with mitigation.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning



Nuri Cho
City Planning Associate

VPB:CTL:MN:nc