

February 27, 2020

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Marqueece Harris-Dawson, Chair
Planning and Land Use Management
Committee
Los Angeles City Council
200 N. Spring Street
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c/o clerk.plumcommittee@lacity.org

Re: 1424 Deepwater
Case No. CPC-2018-7329-GPAJ-ZCJ-SPR; Council Files No. 20-0033
Hearing Date: March 3, 2020

Honorable Chair Harris-Dawson and Councilmembers,

This letter is submitted on behalf of LINC Housing in support of the 1424 Deepwater Project. This supportive housing project consists of 56 dwelling units, all of which will be restricted to very low income senior households exclusive of one manager's unit and will include on-site supportive services ("Project"). The Project has been approved by the Planning Commission and has received wide-spread community support including the support of the Councilmember.

The Planning Commission approved all the entitlements required for the Project, including a Zone Change, General Plan Amendment and Site Plan Review. An appeal has been filed against the Site Plan Review approval which, among other things, raises issues concerning the California Environmental Quality Act ("CEQA"). The Project was approved in full compliance with CEQA under a recently enacted Statutory Exemption applicable to supportive housing pursuant to Public Resources Code Section 21080.27. This Statutory Exemption became effective on September 26, 2019. Prior to that time, the City prepared a detailed Mitigated Negative Declaration ("MND") for the Project. The MND is also contained in the record, and the project approvals include detailed CEQA findings.

This letter responds to each of the points raised in the current appeal.

I. The CEQA Exemption under Public Resources Code Section 21080.27 applies to the Project.

As detailed in the Planning Commission approval Letter of Determination dated December 18, 2019 (“LOD”), the Project meets all the elements of the Statutory Exemption pursuant to Public Resources Code Section 21080.27. Once the elements of the Statutory Exemption are established, there are no exceptions applicable.

Section 21080.27 applies to projects which meet certain criteria on location, type and funding as detailed in state law. The Project meets these elements: first, the Project was approved by the City; second, the Project provides supportive housing in the City. Such housing qualifies as “supportive housing” pursuant to Section 50675.14 of the Health and Safety Code, as it will not limit the length of tenancy, provides the requisite number of units to qualifying homeless individuals and provides the requisite amount of on-site supporting services. (LOD, p. F-17.) The Project’s housing also meets the eligibility requirements for qualified supportive housing of Article 11 (commencing with Section 65650) of Chapter 3 of Division 1 of Title 7 of the Government Code, as it restricts all of its units to very low income households (exclusive of the manager’s unit), provides the requisite number of units to qualifying homeless individuals and the requisite amount of on-site supporting services, and each unit will contain a bathroom and full kitchen with a stovetop, sink and refrigerator. (LOD, pp. F-17 to F-18.) Finally, the Project has received a funding commitment from the Los Angeles Housing and Community Investment Department, and submitted a funding commitment letter dated October 22, 2018 demonstrating that the Project will receive funds from the Proposition HHH Permanent Supportive Housing Loan Program. (See LOD, p. F-19 and Exhibit G.)

Despite the contention in the appeal, nothing under Section 21080.27 limits the Project’s ability to provide affordable housing units to seniors. So long as the Project meets the criteria of the Statutory Exemption, the additional element of providing senior housing does not impact its application.

II. The Mitigated Negative Declaration is also adequate under CEQA.

The appeal argues that the MND’s analysis of impacts related to abandoned oil wells on the Project site is inadequate. In fact, The MND, including Appendix D (Memorandum on Proposed and Anticipated Oil Well and Methane Mitigation Measures), provides substantial evidence that the Project will not result in any significant impacts related to building over abandoned wells. The MND establishes Mitigation measures MM-1 through MM-7, with which the Project will comply in

addition to state regulations, that require a methane mitigation system, passive system, subsurface methane investigation, leak testing and ventilation and protection of oil wells, and completion of all oil well abandonment activities prior to the issuance of grading or building permits. (LOD, pp. F-9 and F-10; and MND, pp. 49-51.)

The appeal mistakenly relies on a letter dated September 18, 2019 from the Department of Conservation, Division of Oil, Gas, and Geothermal Resources (“DOGGR”) which includes boiler plate language cautioning developers of the financial impacts of constructing over abandoned oil wells. The standard language in the DOGGR letter does not take into account the effectiveness of the proposed mitigation measures described above. Regarding safety of placing structures over abandoned oil wells, the MND Appendix D cites to DOGGR’s online Frequently Asked Questions, which asks whether it is safe to construct over abandoned oil wells, and answers: “Yes, However, during DOGGR’s construction site plan review process, the construction site engineer will require all wells to be tested for leakage and all wells under buildings or restricted access must be vented and abandoned or re-abandoned to present day standards. It is advisable to design your project so that you avoid building over old wells since the cost to abandoning or re=abandoning a well is very high, ranging from \$25,000 - \$100,000 and up.” This illustrates that DOGGR’s advice regarding construction over abandoned wells is in fact meant to caution property owners to avoid high financial costs associated with re-abandoning the wells, rather than to prohibit such construction.

III. The Project is consistent with the Community Plan and General Plan.

The Planning Commission found that the Project is in conformity with the General Plan. General Plan consistency involves a review and weighing of all of the goals and policies in the plan. While the appeal take individual policies and alleges inconsistencies, the record as a whole establishes the Project’s consistency with all applicable goals and policies.

- a. The Project is consistent with the existing development patterns and will protect the single-family neighborhood to the north from the encroachment of new out-of-scale development.**

The appeal alleges that the Project, a three-story residential building, is inconsistent with the single-family home neighborhood to the north of the Project site. The record contains evidence that the Project does not impact the character of the single-family homes to the north, and in fact will serve as a buffer between the single-family residential neighborhood to the north and the commercial uses to the

south. (LOD, p. F-5, F-6, F-12.) The Project will be at a lower density and height than is allowed on the commercial properties to the south. The Project is designed with substantial setbacks and landscaping to serve as a buffer from the surrounding residential uses on the north. The Project will be approximately 43 feet away from the nearest single-family homes to the north as the building will be set back approximately 32 feet from the northerly property line, which abuts an 11-foot wide strip of vacant land that separates the single-family homes to the north and the Project site. No vehicular or pedestrian access will be allowed onto any residential street to the north, and a block wall and tall cypress trees will screen the Project from the single-family residential buildings to the north.

b. The Project contributes to the City's goal of providing an equitable distribution of affordable housing.

The appeal erroneously argues that there is distinction between “affordable” housing encouraged in the General Plan and “low-income” housing. In fact, low-income housing is a subset of affordable housing. The Southern California Association of Governments (“SCAG”) is in the process of allocating a forecasted household need for the City, which is currently projected at 455,565 units, of which 115,676 must be restricted for very-low income households.¹ Each of the Project’s units will be restricted to very low income households (exclusive of the manager’s unit). That means that these units will only be available to persons and families whose incomes do not exceed 50 percent of the area mean income.² (LOD, p. C-1; City Municipal Code § 11.5.11; Health and Safety Code § 50105.) Therefore, the Project implements the City’s goals related to affordable housing.

IV. The Project provides sufficient parking consistent with state requirements for affordable housing projects.

The appeal alleges that the Project does not provide sufficient parking to serve future residents. The Project is eligible for a Developer’s Incentive for reduced parking as a 100 percent affordable housing project at a ratio of 0.3 parking space per dwelling unit for special needs having either paratransit service or unobstructed access within 1/2 mile to fixed bus route service that operates at least 8 times a day, consistent with Government Code Section 65915(p)(2). Accordingly, the Project will provide 19 parking spaces at grade level, and 48 long-term and 5 short-term bicycle

¹ Regional Council Approved DRAFT RHNA Methodology Estimate Tool (Updated 02/18/20)

² U.S. Department of Housing and Urban Development limits for very low income housing are described by the Housing Authority of Los Angeles at <https://home.hacla.org/abouts8> (last accessed 01/31/20).

parking spaces. The record contains evidence that the Project applicant has extensive experience operating supportive housing developments and has knowledge indicating that this amount of parking is sufficient to meet the Project's needs.

V. The appeal misstates Project access, which is clearly described in the record.

The appeal states that the Project's access is not adequately described. The record clearly demonstrates that the Project's access is limited to Eubank Avenue and that the Project includes a 26-foot wide drive aisle along the northernly property line (See the Project's conceptual site plans on page 17 of the MND.) The drive aisle is entirely internal to the Project site and, therefore, no dedication of public right-of-way is required and no impediment to the property to the north will occur. Further, there are no gates allowing any access (pedestrian, vehicular or emergency) to the north into the residential area. The Project drive aisle terminates in a "hammer-head" turnaround sufficiently sized to accommodate all traffic including deliveries and emergency vehicles on site.

VI. The Project will not impede any emergency access routes.

The appeal alleges that the Project will impact emergency access in the vicinity of the Project. The record contains evidence that the Project will have no traffic impacts and no impacts to emergency access to the Project site and in the Project area. The Los Angeles Department of Transportation ("LADOT") has reviewed the Project and, in correspondence dated November 15, 2018 (see MND, Appendix F), determined that the project does not exceed the LADOT threshold to require a traffic analysis and would not result in significant impacts related to traffic.

Although a traffic analysis was not required for the Project, a Site Access Assessment was prepared that forecasts potential vehicular trip generation, analyzes the operation of the Project's driveway, and assesses the Project's relative effect to traffic operations on Eubank Avenue. (See Exhibit A, Site Access Analysis.) The site access analysis demonstrates that the vehicle ingress and egress from the Project driveway is expected to operate at a very good level of service ("LOS") (i.e., LOS B) during both the AM and PM peak hours under "existing with Project" conditions. The analysis concluded that Project-related traffic will not have any adverse effect on traffic flow on Eubank Avenue, including during the weekday AM and PM commute peak hours.

The MND also analyzes potential impacts to emergency access. The MND explains that the nearest emergency route is Pacific Coast Highway, approximately 230 feet to

the south of the Project site, and Avalon Boulevard, approximately 1,500 feet to the west of the Project site. The Project would not require the closure of any public or private streets and would not result in excessive traffic congestion such that it would impede emergency vehicle access to the Project site or surrounding area. Further, emergency access to and from the Project site will be provided in accordance with requirements of the Los Angeles Fire Department. Therefore, the record demonstrates that the Project will not impact emergency access to the Project site or the Project area.

VII. The Project is designed to protect the privacy of the neighboring residents.

The appeal alleges that the Project will affect the privacy of the nearby single-family neighborhood. However, the record shows that the Project is designed to protect such privacy. The Project provides substantial setbacks and landscaping to serve as a buffer from the surrounding residential uses on the north. The Project will be more than 44 feet away from the nearest single-family properties to the north, as the building will be set back more than 33 feet from the northerly property line, which abuts an 11-foot wide strip of vacant land that separates the single-family homes to the north and the Property. The northerly property line will provide an 8-foot block wall and italian cypress trees to screen the Project from the single-family residential buildings to the north. The record contains Project plans that demonstrate these buffers and the sight lines from the upper story of the Project into the neighboring single-family homes, and show that proposed walls and trees will ensure that Project residents do not look directly into neighboring yards or properties. (See Exhibit B, Project Buffer and Sight Line.) These exhibits shows that the Project does not impact the privacy of the neighboring homes.

VIII. Clarification of Condition

In reviewing the Project's LOD dated December 18, 2019, we found that the language of Condition 33 is inconsistent with the City Municipal Code requirements. Accordingly, we request a minor clarification of this condition to conform to the language to the Municipal Code. The requested clarification is attached to this letter (see Exhibit C, Corrections to Letter of Determination) and makes no substantive change to the required mitigation. This correction has been approved as a minor clarification by staff, who confirmed it is not a substantive change. We ask that your Committee make this minor change for purposes of clarification.

For the reasons outlined above, the appeal is without merit and should be denied. LINC Housing respectfully requests that the PLUM Committee recommend approval of the Project and allow the construction of this much-needed supportive housing

Marqueece Harris-Dawson, Chair
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project. We look forward to presenting the Project and responding to any questions at the PLUM Committee meeting on March 3, 2020.

Sincerely,

A handwritten signature in black ink, appearing to read "Clare Bronowski", with a long, sweeping flourish extending to the right.

CLARE BRONOWSKI
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

CB:smd

Enclosures
Exhibit A
Exhibit B
Exhibit C

Exhibit A

MEMORANDUM

| | | | |
|----------|--|----------|------------------|
| To: | Cody Snyder LINC Housing | Date: | December 2, 2019 |
| From: | David S. Shender, P.E. Jason A. Shender Linscott, Law & Greenspan, Engineers | LLG Ref: | 5-19-0487-1 |
| Subject: | Site Access Assessment for the Proposed Affordable Housing Project Located at the 1424 Deepwater Avenue | | |

This memorandum has been prepared by Linscott, Law & Greenspan, Engineers (LLG) to provide a site access assessment associated with the proposed affordable housing project (the “Project”) located at 1424 Deepwater Avenue in the Wilmington area of the City of Los Angeles (the “Project Site”). The Project proposes the development of 56 permanent supportive housing dwelling units. A total of 19 parking spaces will be provided in an on-site surface parking lot. The Project Site location and general vicinity are shown in **Figure 1**.

The site plan for the Project is illustrated in **Figure 2**. As shown on the site plan, vehicular access is proposed via a driveway on Eubank Avenue.

This memorandum provides: 1) a description of the existing setting; 2) a description of the proposed Project and its forecast potential vehicular trip generation; 3) an operational analysis of the Project’s driveway; and 4) an assessment of the Project’s relative effect to traffic operations on Eubank Avenue.

Existing Setting

As noted above, the Project Site is located at 1424 Deepwater Avenue in the Wilmington area of the City of Los Angeles. The existing Project Site is vacant. The Project Site is bound by single-family homes to the north and west, a self-storage facility to the south, and Eubank Avenue to the east. An existing driveway apron is provided at the Project Site on Eubank Avenue in the same general location as the proposed Project driveway, although it is currently fenced off.

Eubank Avenue is striped to provide one vehicle travel lane in each direction adjacent to the Project Site, as well as one separate bicycle lane in each direction. Street parking is not permitted on Eubank Avenue.

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Existing Traffic Volumes

Automatic 24-hour machine traffic counts were conducted on Tuesday, November 19, 2019 on Eubank Avenue between E. Sandison Street and E. O Street to determine the average daily traffic (ADT) on Eubank Avenue, which borders the Project Site to the east. Additionally, the ADT counts provide the existing traffic volumes for the AM and PM peak commuter periods.

Copies of the 24-hour machine counts are contained in *Appendix A* attached to this memorandum. The existing AM and PM peak hour volumes on the Eubank Avenue segment intersection are shown on *Figure 3*.

Proposed Project Description

The Project proposes the development of 56 permanent supportive senior housing dwelling units. A total of 19 parking spaces are proposed to be provided within the Project's on-site surface parking lot.

As shown on *Figure 2*, vehicular access to the Project Site will be provided via one driveway along the west side of Eubank Avenue, at the northeasterly end of the Project Site. The Project driveway is proposed to accommodate left-turn and right-turn ingress and egress turning movements. The Project Site will not be accessible from Deepwater Avenue.

Project Trip Generation

Traffic volumes expected to be generated by the proposed Project during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using the affordable housing trip rates published on Table 3.3-2 of the LADOT *Transportation Assessment Guidelines*¹.

Table 1 attached to this memorandum provides the trip generation forecast for the Project. As shown in *Table 1*, the Project on a typical weekday is forecast to result in 96 net new daily vehicle trips (e.g., 48 inbound trips, 48 outbound trips), 7 net new AM peak hour trips (3 inbound trips and 4 outbound trips), and 8 net new PM peak hour trips (4 inbound trips and 4 outbound trips).

¹*Transportation Assessment Guidelines*, City of Los Angeles Department of Transportation, July 2019.

Per the LADOT *Transportation Assessment Guidelines*, preparation of a Vehicle Miles Traveled (VMT) analysis and a Transportation Assessment for review and approval by LADOT staff is not required, as the Project would not generate 250 net new daily trips.

Project Trip Assignment

The weekday AM and PM commuter peak hour vehicle trips forecast to be generated by the Project were assigned to Eubank Avenue. **Figure 4** provides the vehicular trip distribution for the Project and **Figure 5** displays the forecast AM and PM peak hour Project-related trips at the driveway.

Traffic Volume Forecast

As previously noted, the existing traffic volumes on Eubank Avenue at the proposed Project driveway are presented in **Figure 3**. The forecast traffic volumes associated with the Project at the Eubank Avenue driveway are then added to the existing volumes to obtain the Existing with Project traffic volumes, which are shown on **Figure 6**.

Driveway Operation Analysis

An operational analysis was prepared to evaluate expected operations at the Project driveway. The operational analysis was prepared using the existing weekday AM and PM peak hour traffic counts on Eubank Avenue, as well as the forecast traffic volumes turning to and from the Project driveway, which are presented on **Figure 6**.

Forecast traffic operations at the Project driveway were evaluated for the Existing with Project conditions. As the driveway is proposed to be stop-sign controlled (i.e., stop signs facing exiting Project traffic), the analysis was prepared using the unsignalized intersection methodology provided in the *Highway Capacity Manual* (HCM) published by the Transportation Research Board. The HCM methodology allows the analysis of turning movements at the driveway, with the following specific outputs:

- Control delay (measured in vehicles/seconds): Control delay is the estimated time that the average motorist will require to wait prior to completing a specific turning movement at an intersection during the analyzed peak hour.

- Level of Service (LOS): A qualitative description of operations at an intersection, ranging from LOS A to F. LOS is defined based on calculated amount of motorist delay.
- 95th Percentile Vehicle Queue: The calculated length of vehicle queues waiting to complete a specific turning movement at an intersection during the analyzed peak hour. The 95th percent confidence level indicates that the queue will be at or below this length 95 percent of the time during the analyzed peak hour.

Control delay, LOS, and 95th Percentile Vehicle Queue calculations have been prepared for the Project driveway under Existing with Project conditions during the AM and PM peak hours. **Table 2** provides a summary of the HCM analysis for the Project driveway intersection during the AM and PM peak hours. The HCM data worksheets for the driveway are contained in **Appendix B**.

As indicated in *Table 2*, vehicle ingress and egress from the Project Site driveway is expected to operate at a very good LOS (i.e., LOS B) during both the AM and PM peak hours under Existing with Project conditions. Specifically, for motorists turning left into the Project Site from northbound Eubank Avenue, the forecast average motorist delay is 8.0 seconds in the AM peak hour and 8.3 seconds in the PM peak hour. Additionally, the forecast 95th percentile queuing related to vehicles on northbound Eubank Avenue turning left into the Project Site would not exceed one vehicle for all movements at the site driveway. This is due to: 1) the relatively minimal delays for vehicles to complete the left-turn; and 2) the highly infrequent occurrence of vehicles turning left into the Project Site from northbound Eubank Avenue (i.e., two vehicles in the AM peak hour and three vehicles in the PM peak hour as shown on *Figure 6*).

Based on the driveway operation analysis, Project-related traffic will not have any adverse effect to traffic flow to Eubank Avenue, including during the weekday AM and PM commuter peak hours.

Summary

This memorandum provides the site access assessment prepared for the proposed affordable housing project located at 1424 Deepwater Avenue in the Wilmington area of the City of Los Angeles. The conclusions of the site access assessment are as follows:

- The Project is forecast to generate 96 new daily vehicle trips, 7 net new AM peak hour trips, and 8 net new PM peak hour trips during a typical weekday.

- Based on the driveway operations analysis, vehicle ingress and egress at the Project driveway would operate at good Levels of Service (i.e., LOS B or better) during the weekday AM and PM peak hours. Specifically, motorists turning left into the Project Site from northbound Eubank Avenue would on average experience a delay of approximately eight seconds. The relatively limited delay and highly infrequent occurrence of left-turns into the Project Site (two vehicles in the AM peak hour and three vehicles in the PM peak hour) would result in nearly no vehicle queues on Eubank Avenue.
- Based on the driveway operation analysis, Project-related traffic will not have any adverse effect to traffic flow to Eubank Avenue, including during the weekday AM and PM commuter peak hours.

cc: File

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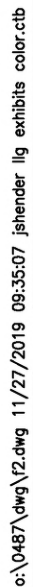
NOT TO SCALE

MAP SOURCE: GOOGLE MAPS

PROJECT SITE

STUDY STREET SEGMENT

FIGURE 1
VICINITY MAP



NOT TO SCALE

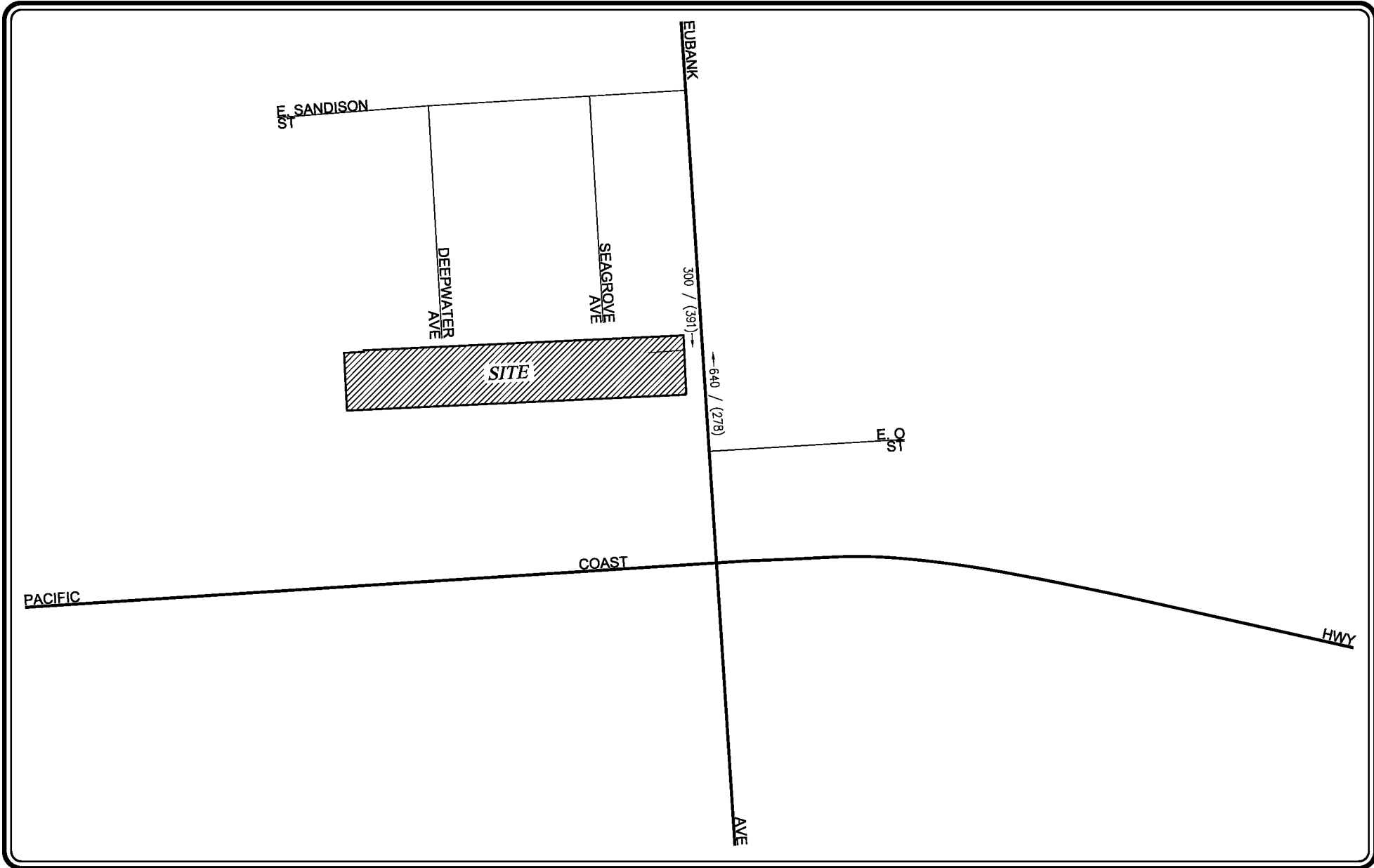
MAP SOURCE: D33 DESIGN & PLANNING

LINSCOTT, LAW & GREENSPAN, engineers

FIGURE 2
PROJECT SITE PLAN

1424 DEEPWATER AVENUE ACCESS

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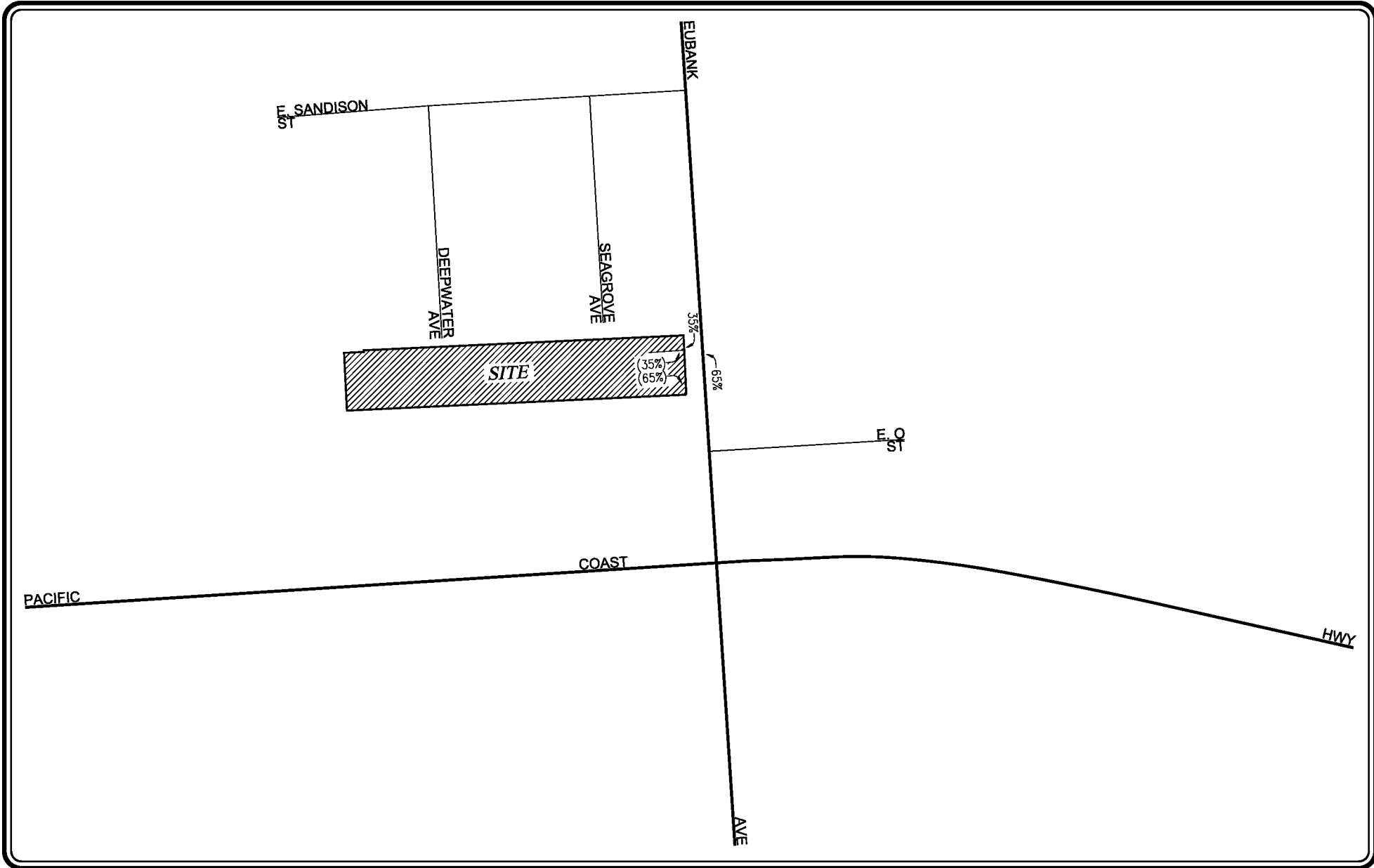


NOT TO SCALE

XX / (XX) = AM / (PM) PEAK HOUR TRAFFIC VOLUMES

FIGURE 3
EXISTING TRAFFIC VOLUMES

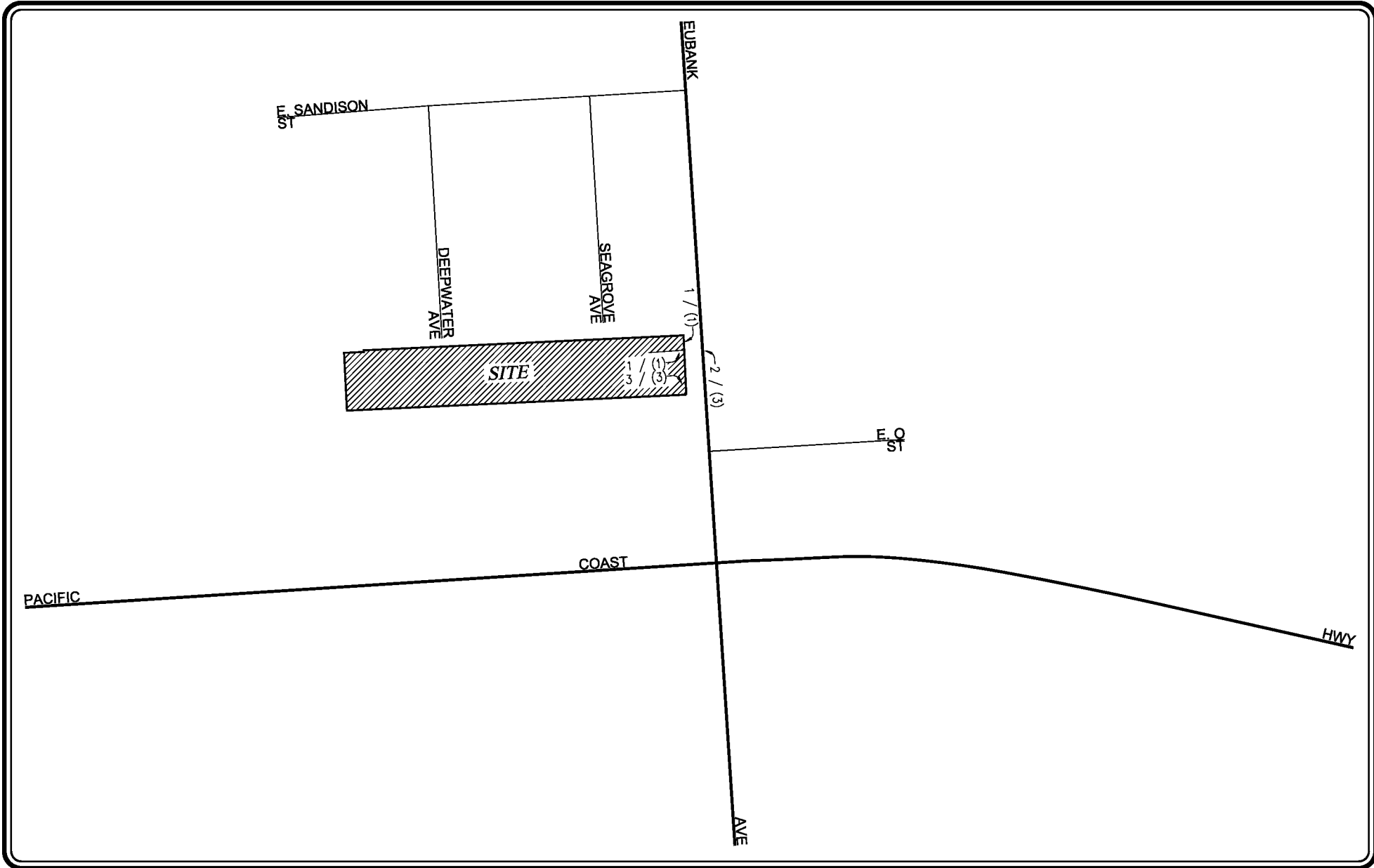
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■ PROJECT SITE
= INBOUND PERCENTAGES
(##) = OUTBOUND PERCENTAGES

FIGURE 4
PROJECT TRIP DISTRIBUTION

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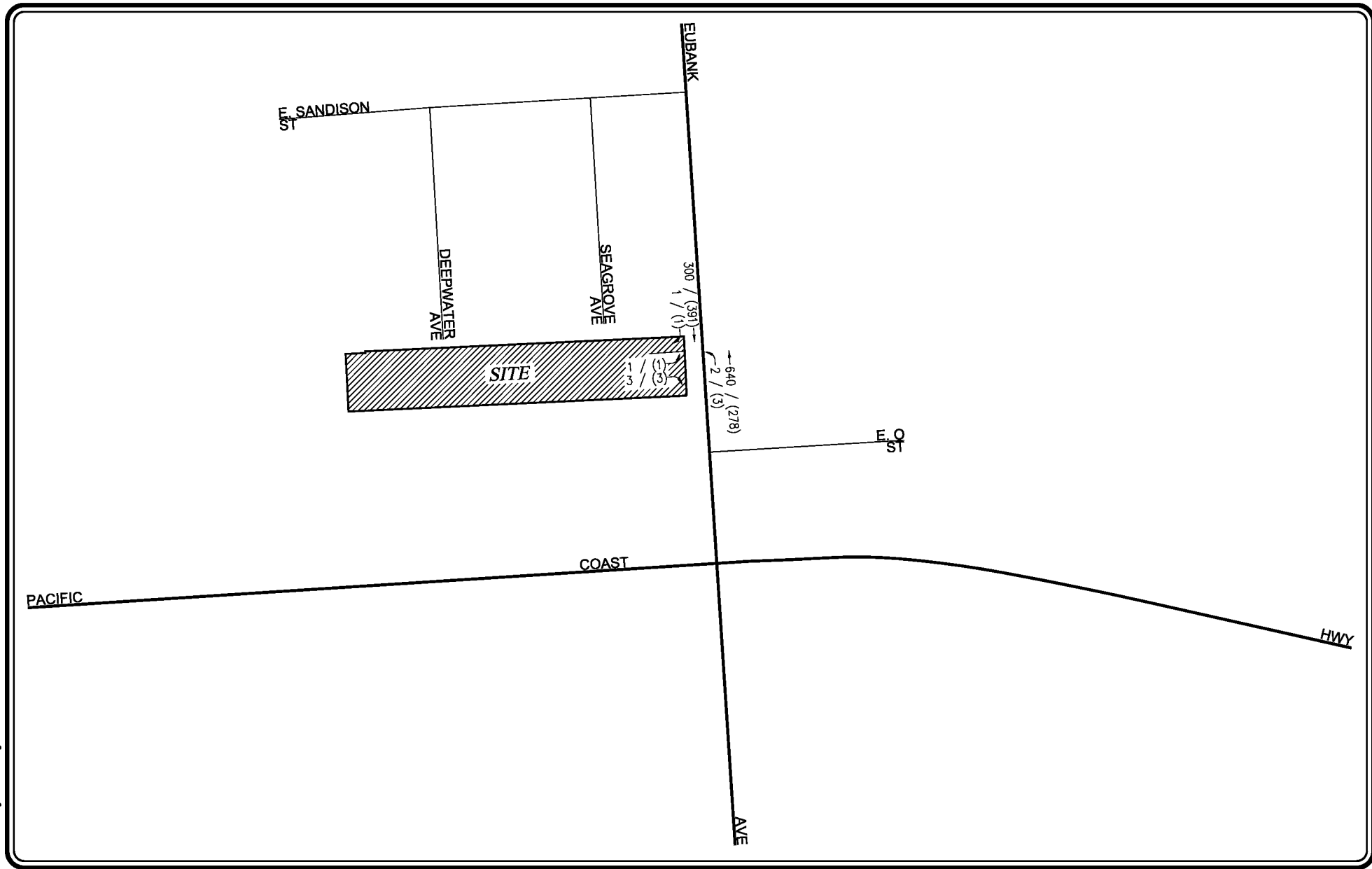


NOT TO SCALE

XX / (XX) = AM / (PM) PEAK HOUR TRAFFIC VOLUMES

FIGURE 5
PROJECT TRAFFIC VOLUMES

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NOT TO SCALE

XX / (XX) = AM / (PM) PEAK HOUR TRAFFIC VOLUMES

FIGURE 6
EXISTING WITH PROJECT TRAFFIC VOLUMES

Table 1
PROJECT TRIP GENERATION [1]

20-Nov-19

| LAND USE | SIZE | DAILY TRIP ENDS [2] VOLUMES | AM PEAK HOUR VOLUMES [2] | | | PM PEAK HOUR VOLUMES [2] | | |
|---|-------|-----------------------------------|-----------------------------|----------|----------|-----------------------------|----------|----------|
| | | | IN | OUT | TOTAL | IN | OUT | TOTAL |
| <i>Proposed Project</i> Permanent Supportive Senior Housing [3] | 56 DU | 96 | 3 | 4 | 7 | 4 | 4 | 8 |
| NET INCREASE PROJECT TRIPS | | 96 | 3 | 4 | 7 | 4 | 4 | 8 |

[1] Source: Table 3.3-2 of the LADOT "Transportation Assessment Guidelines", July 2019.

[2] Trips are one-way traffic movements, entering or leaving.

[3] City of Los Angeles Affordable Housing (Seniors) trip generation average rates.
 - Daily Trip Rate: 1.72 trips/dwelling units; 50% inbound/50% outbound
 - AM Peak Hour Trip Rate: 0.12 trips/dwelling unit; 38% inbound/62% outbound
 - PM Peak Hour Trip Rate: 0.15 trips/dwelling unit; 52% inbound/48% outbound

Table 2
HCM DRIVEWAY ANALYSIS [A]
WEEKDAY AM AND PM PEAK HOURS
PROPOSED PROJECT DRIVEWAY

02-Dec-19

| NO. | INTERSECTION | PEAK HOUR | TRAFFIC MOVEMENT | EXISTING + PROJECT | | |
|-----|--|-----------|--------------------------|--------------------|---------|-----------|
| | | | | DELAY [B] | LOS [C] | QUEUE [D] |
| 1 | Eubank Avenue / Project Site Driveway | AM | NB Left (Inbound) | 8.0 | A | 0.0 |
| | | | EB Left/Right (Outbound) | 13.1 | B | 0.0 |
| | | PM | NB Left (Inbound) | 8.3 | A | 0.0 |
| | | | EB Left/Right (Outbound) | 11.9 | B | 0.0 |

[A] Intersection analysis based on the Highway Capacity Manual operational analysis methodologies.

[B] Control delay reported in seconds per vehicle.

[C] Unsignalized Intersection Levels of Service were based on the following criteria:

| <u>Control Delay (s/veh)</u> | <u>LOS</u> |
|------------------------------|------------|
| <= 10 | A |
| > 10-15 | B |
| > 15-25 | C |
| > 25-35 | D |
| > 35-50 | E |
| > 50 | F |

[D] 95th percentile vehicle queue expressed in number of vehicles.

APPENDIX A

24-HOUR MACHINE TRAFFIC COUNT DATA

VOLUME

Eubank Ave Bet. E Sandison St & E O St

Day: Tuesday
Date: 11/19/2019City: Wilmington
Project #: CA19_5717_001

| DAILY TOTALS | | | | | NB | SB | EB | | | | | WB | Total |
|--------------|-------|-------|----|-----|-------|-----------|-------|-------|----|-----|-------|-----|-------|
| | | | | | 3,703 | 3,646 | | | | | | 0 | 0 |
| AM Period | NB | SB | EB | WB | TOTAL | PM Period | NB | SB | EB | WB | TOTAL | | |
| 00:00 | 3 | 5 | | | 8 | 12:00 | 38 | 53 | | | 91 | | |
| 00:15 | 3 | 2 | | | 5 | 12:15 | 43 | 60 | | | 103 | | |
| 00:30 | 8 | 4 | | | 12 | 12:30 | 40 | 49 | | | 89 | | |
| 00:45 | 9 | 23 | 8 | 19 | 17 | 12:45 | 55 | 176 | 46 | 208 | 101 | 384 | |
| 01:00 | 7 | 6 | | | 13 | 13:00 | 60 | 38 | | | 98 | | |
| 01:15 | 7 | 4 | | | 11 | 13:15 | 65 | 47 | | | 112 | | |
| 01:30 | 5 | 2 | | | 7 | 13:30 | 56 | 55 | | | 111 | | |
| 01:45 | 1 | 20 | 4 | 16 | 5 | 13:45 | 37 | 218 | 58 | 198 | 95 | 416 | |
| 02:00 | 1 | 4 | | | 5 | 14:00 | 53 | 52 | | | 105 | | |
| 02:15 | 3 | 5 | | | 8 | 14:15 | 50 | 45 | | | 95 | | |
| 02:30 | 4 | 5 | | | 9 | 14:30 | 83 | 64 | | | 147 | | |
| 02:45 | 6 | 14 | 3 | 17 | 9 | 14:45 | 69 | 255 | 94 | 255 | 163 | 510 | |
| 03:00 | 4 | 3 | | | 7 | 15:00 | 93 | 133 | | | 226 | | |
| 03:15 | 10 | 3 | | | 13 | 15:15 | 66 | 129 | | | 195 | | |
| 03:30 | 5 | 4 | | | 9 | 15:30 | 59 | 85 | | | 144 | | |
| 03:45 | 4 | 23 | 0 | 10 | 4 | 15:45 | 55 | 273 | 85 | 432 | 140 | 705 | |
| 04:00 | 6 | 3 | | | 9 | 16:00 | 49 | 83 | | | 132 | | |
| 04:15 | 6 | 1 | | | 7 | 16:15 | 60 | 95 | | | 155 | | |
| 04:30 | 8 | 8 | | | 16 | 16:30 | 64 | 81 | | | 145 | | |
| 04:45 | 14 | 34 | 9 | 21 | 23 | 16:45 | 58 | 231 | 90 | 349 | 148 | 580 | |
| 05:00 | 14 | 6 | | | 20 | 17:00 | 85 | 105 | | | 190 | | |
| 05:15 | 10 | 12 | | | 22 | 17:15 | 63 | 108 | | | 171 | | |
| 05:30 | 27 | 9 | | | 36 | 17:30 | 71 | 88 | | | 159 | | |
| 05:45 | 40 | 91 | 19 | 46 | 59 | 17:45 | 59 | 278 | 64 | 365 | 123 | 643 | |
| 06:00 | 33 | 11 | | | 44 | 18:00 | 41 | 51 | | | 92 | | |
| 06:15 | 35 | 25 | | | 60 | 18:15 | 28 | 60 | | | 88 | | |
| 06:30 | 69 | 31 | | | 100 | 18:30 | 36 | 40 | | | 76 | | |
| 06:45 | 67 | 204 | 46 | 113 | 113 | 18:45 | 24 | 129 | 41 | 192 | 65 | 321 | |
| 07:00 | 63 | 38 | | | 101 | 19:00 | 38 | 43 | | | 81 | | |
| 07:15 | 130 | 31 | | | 161 | 19:15 | 14 | 35 | | | 49 | | |
| 07:30 | 188 | 70 | | | 258 | 19:30 | 23 | 29 | | | 52 | | |
| 07:45 | 197 | 578 | 81 | 220 | 278 | 19:45 | 16 | 91 | 31 | 138 | 47 | 229 | |
| 08:00 | 125 | 95 | | | 220 | 20:00 | 25 | 28 | | | 53 | | |
| 08:15 | 74 | 54 | | | 128 | 20:15 | 18 | 17 | | | 35 | | |
| 08:30 | 55 | 65 | | | 120 | 20:30 | 15 | 29 | | | 44 | | |
| 08:45 | 56 | 310 | 41 | 255 | 97 | 20:45 | 15 | 73 | 21 | 95 | 36 | 168 | |
| 09:00 | 45 | 41 | | | 86 | 21:00 | 21 | 35 | | | 56 | | |
| 09:15 | 58 | 40 | | | 98 | 21:15 | 20 | 18 | | | 38 | | |
| 09:30 | 40 | 48 | | | 88 | 21:30 | 13 | 21 | | | 34 | | |
| 09:45 | 23 | 166 | 37 | 166 | 60 | 21:45 | 19 | 73 | 10 | 84 | 29 | 157 | |
| 10:00 | 43 | 37 | | | 80 | 22:00 | 8 | 22 | | | 30 | | |
| 10:15 | 40 | 39 | | | 79 | 22:15 | 10 | 17 | | | 27 | | |
| 10:30 | 38 | 39 | | | 77 | 22:30 | 20 | 19 | | | 39 | | |
| 10:45 | 32 | 153 | 33 | 148 | 65 | 22:45 | 18 | 56 | 15 | 73 | 33 | 129 | |
| 11:00 | 39 | 53 | | | 92 | 23:00 | 14 | 9 | | | 23 | | |
| 11:15 | 37 | 45 | | | 82 | 23:15 | 11 | 11 | | | 22 | | |
| 11:30 | 42 | 44 | | | 86 | 23:30 | 8 | 8 | | | 16 | | |
| 11:45 | 78 | 196 | 44 | 186 | 122 | 23:45 | 5 | 38 | 12 | 40 | 17 | 78 | |
| TOTALS | 1812 | 1217 | | | 3029 | TOTALS | 1891 | 2429 | | | 4320 | | |
| SPLIT % | 59.8% | 40.2% | | | 41.2% | SPLIT % | 43.8% | 56.2% | | | 58.8% | | |

| DAILY TOTALS | | | | NB | SB | EB | | | | WB | Total | |
|-----------------|-------|-------|-------|-------|-------|-----------------|-------|-------|-------|-------|-------|--|
| | | | | 3,703 | 3,646 | | | | | 0 | | |
| AM Peak Hour | 07:15 | 07:30 | | | 07:15 | PM Peak Hour | 14:30 | 14:45 | | | 14:30 | |
| AM Pk Volume | 640 | 300 | | | 917 | PM Pk Volume | 311 | 441 | | | 731 | |
| Pk Hr Factor | 0.812 | 0.789 | | | 0.825 | Pk Hr Factor | 0.836 | 0.829 | | | 0.809 | |
| 7 - 9 Volume | 888 | 475 | 0 | 0 | 1363 | 4 - 6 Volume | 509 | 714 | 0 | 0 | 1223 | |
| 7 - 9 Peak Hour | 07:15 | 07:30 | | | 07:15 | 4 - 6 Peak Hour | 17:00 | 16:45 | | | 16:45 | |
| 7 - 9 Pk Volume | 640 | 300 | 0 | 0 | 917 | 4 - 6 Pk Volume | 278 | 391 | 0 | 0 | 668 | |
| Pk Hr Factor | 0.812 | 0.789 | 0.000 | 0.000 | 0.825 | Pk Hr Factor | 0.818 | 0.905 | 0.000 | 0.000 | 0.879 | |

APPENDIX B

HCM AND LEVELS OF SERVICE EXPLANATION HCM DATA WORKSHEETS – WEEKDAY AM AND PM PEAK HOURS

LEVEL OF SERVICE FOR UNSIGNALIZED INTERSECTIONS

In the *Highway Capacity Manual (HCM)*, published by the Transportation Research Board, 2010, level of service for unsignalized intersections is defined in terms of delay, which is a measure of driver discomfort, frustration, fuel consumption, and lost travel time. The delay experienced by a motorist is made up of a number of factors that relate to control, geometrics, traffic, and incidents. Total delay is the difference between the travel time actually experienced and the reference travel time that would result during base conditions, in the absence of incidents, control, traffic, or geometric delay. Only the portion of total delay attributed to the traffic control measures, either traffic signals or stop signs, is quantified. This delay is called *control delay*. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay.

Level of Service criteria for unsignalized intersections are stated in terms of the average control delay per vehicle. The level of service is determined by the computed or measured control delay and is defined for each minor movement. Average control delay for any particular minor movement is a function of the service time for the approach and the degree of utilization. (Level of service is not defined for the intersection as a whole for two-way stop controlled intersections.)

| Level of Service Criteria for TWSC/AWSC Intersections | |
|---|------------------------------------|
| Level of Service | Average Control Delay (Sec/Veh) |
| A | ≤ 10 |
| B | > 10 and ≤ 15 |
| C | > 15 and ≤ 25 |
| D | > 25 and ≤ 35 |
| E | > 35 and ≤ 50 |
| F | > 50 |

Level of Service (LOS) values are used to describe intersection operations with service levels varying from LOS A (free flow) to LOS F (jammed condition). The following descriptions summarize *HCM* criteria for each level of service:

LOS A describes operations with very low control delay, up to 10 seconds per vehicle.

LOS B describes operations with control delay greater than 10 and up to 15 seconds per vehicle.

LOS C describes operations with control delay greater than 15 and up to 25 seconds per vehicle.

LOS D describes operations with control delay greater than 25 and up to 35 seconds per vehicle.

LOS E describes operations with control delay greater than 35 and up to 50 seconds per vehicle.

LOS F describes operations with control delay in excess of 50 seconds per vehicle. For two-way stop controlled intersections, LOS F exists when there are insufficient gaps of suitable size to allow side-street demand to safely cross through a major-street traffic stream. This level of service is generally evident from extremely long control delays experienced by side-street traffic and by queuing on the minor-street approaches.

HCS7 Two-Way Stop-Control Report

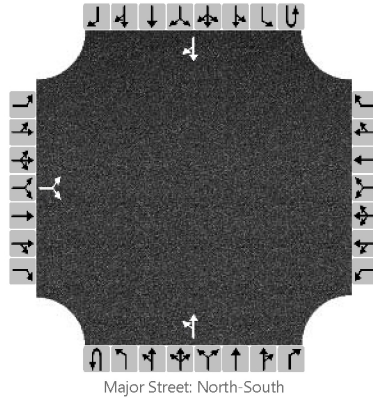
General Information

| | |
|--------------------------|------------------------------|
| Analyst | JAS |
| Agency/Co. | Linscott, Law & Greenspan |
| Date Performed | 11/21/2019 |
| Analysis Year | 2019 |
| Time Analyzed | Existing + Project -AM |
| Intersection Orientation | North-South |
| Project Description | 1424 Deepwater Avenue Access |

Site Information

| | |
|----------------------------|-----------------------|
| Intersection | Intersection #1 |
| Jurisdiction | City of Los Angeles |
| East/West Street | Project Site Driveway |
| North/South Street | Eubank Avenue |
| Peak Hour Factor | 0.83 |
| Analysis Time Period (hrs) | 0.25 |

Lanes



Vehicle Volumes and Adjustments

| Approach | Eastbound | | | | Westbound | | | | Northbound | | | | Southbound | | | |
|----------------------------|-----------|----|----|----|-----------|---|---|---|------------|----|-----|---|------------|---|-----|----|
| Movement | U | L | T | R | U | L | T | R | U | L | T | R | U | L | T | R |
| Priority | | 10 | 11 | 12 | | 7 | 8 | 9 | 1U | 1 | 2 | 3 | 4U | 4 | 5 | 6 |
| Number of Lanes | | 0 | 1 | 0 | | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 0 |
| Configuration | | | LR | | | | | | | LT | | | | | | TR |
| Volume, V (veh/h) | | 1 | | 3 | | | | | | 2 | 640 | | | | 300 | 1 |
| Percent Heavy Vehicles (%) | | 3 | | 3 | | | | | | 3 | | | | | | |
| Proportion Time Blocked | | | | | | | | | | | | | | | | |
| Percent Grade (%) | 0 | | | | | | | | | | | | | | | |
| Right Turn Channelized | No | | | | No | | | | No | | | | No | | | |
| Median Type/Storage | Undivided | | | | | | | | | | | | | | | |

Critical and Follow-up Headways

| | | | | | | | | | | | | | | | | |
|------------------------------|--|------|--|------|--|--|--|--|--|------|--|--|--|--|--|--|
| Base Critical Headway (sec) | | 7.1 | | 6.2 | | | | | | 4.1 | | | | | | |
| Critical Headway (sec) | | 6.43 | | 6.23 | | | | | | 4.13 | | | | | | |
| Base Follow-Up Headway (sec) | | 3.5 | | 3.3 | | | | | | 2.2 | | | | | | |
| Follow-Up Headway (sec) | | 3.53 | | 3.33 | | | | | | 2.23 | | | | | | |

Delay, Queue Length, and Level of Service

| | | | | | | | | | | | | | | | | |
|---|------|--|------|--|--|--|--|--|-----|------|--|--|--|--|--|--|
| Flow Rate, v (veh/h) | | | 5 | | | | | | | 2 | | | | | | |
| Capacity, c (veh/h) | | | 448 | | | | | | | 1189 | | | | | | |
| v/c Ratio | | | 0.01 | | | | | | | 0.00 | | | | | | |
| 95% Queue Length, Q ₉₅ (veh) | | | 0.0 | | | | | | | 0.0 | | | | | | |
| Control Delay (s/veh) | | | 13.1 | | | | | | | 8.0 | | | | | | |
| Level of Service, LOS | | | B | | | | | | | A | | | | | | |
| Approach Delay (s/veh) | 13.1 | | | | | | | | 0.1 | | | | | | | |
| Approach LOS | B | | | | | | | | | | | | | | | |

HCS7 Two-Way Stop-Control Report

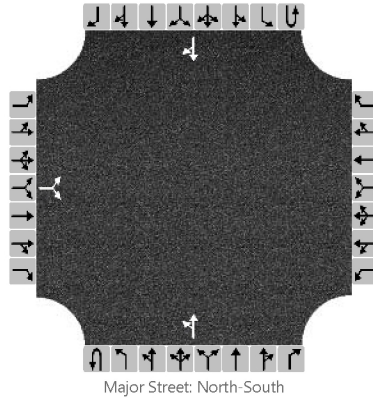
General Information

| | |
|--------------------------|------------------------------|
| Analyst | JAS |
| Agency/Co. | Linscott, Law & Greenspan |
| Date Performed | 11/21/2019 |
| Analysis Year | 2019 |
| Time Analyzed | Existing + Project - PM |
| Intersection Orientation | North-South |
| Project Description | 1424 Deepwater Avenue Access |

Site Information

| | |
|----------------------------|-----------------------|
| Intersection | Intersection #1 |
| Jurisdiction | City of Los Angeles |
| East/West Street | Project Site Driveway |
| North/South Street | Eubank Avenue |
| Peak Hour Factor | 0.88 |
| Analysis Time Period (hrs) | 0.25 |

Lanes



Vehicle Volumes and Adjustments

| Approach | Eastbound | | | | Westbound | | | | Northbound | | | | Southbound | | | |
|----------------------------|-----------|----|----|----|-----------|---|---|---|------------|----|-----|---|------------|---|-----|----|
| Movement | U | L | T | R | U | L | T | R | U | L | T | R | U | L | T | R |
| Priority | | 10 | 11 | 12 | | 7 | 8 | 9 | 1U | 1 | 2 | 3 | 4U | 4 | 5 | 6 |
| Number of Lanes | | 0 | 1 | 0 | | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 0 |
| Configuration | | | LR | | | | | | | LT | | | | | | TR |
| Volume, V (veh/h) | | 1 | | 3 | | | | | | 3 | 278 | | | | 391 | 1 |
| Percent Heavy Vehicles (%) | | 3 | | 3 | | | | | | 3 | | | | | | |
| Proportion Time Blocked | | | | | | | | | | | | | | | | |
| Percent Grade (%) | 0 | | | | | | | | | | | | | | | |
| Right Turn Channelized | No | | | | No | | | | No | | | | No | | | |
| Median Type/Storage | Undivided | | | | | | | | | | | | | | | |

Critical and Follow-up Headways

| | | | | | | | | | | | | | | | | |
|------------------------------|--|------|--|------|--|--|--|--|--|------|--|--|--|--|--|--|
| Base Critical Headway (sec) | | 7.1 | | 6.2 | | | | | | 4.1 | | | | | | |
| Critical Headway (sec) | | 6.43 | | 6.23 | | | | | | 4.13 | | | | | | |
| Base Follow-Up Headway (sec) | | 3.5 | | 3.3 | | | | | | 2.2 | | | | | | |
| Follow-Up Headway (sec) | | 3.53 | | 3.33 | | | | | | 2.23 | | | | | | |

Delay, Queue Length, and Level of Service

| | | | | | | | | | | | | | | | | |
|---|------|--|------|--|--|--|--|--|-----|------|--|--|--|--|--|--|
| Flow Rate, v (veh/h) | | | 5 | | | | | | | 3 | | | | | | |
| Capacity, c (veh/h) | | | 524 | | | | | | | 1109 | | | | | | |
| v/c Ratio | | | 0.01 | | | | | | | 0.00 | | | | | | |
| 95% Queue Length, Q ₉₅ (veh) | | | 0.0 | | | | | | | 0.0 | | | | | | |
| Control Delay (s/veh) | | | 11.9 | | | | | | | 8.3 | | | | | | |
| Level of Service, LOS | | | B | | | | | | | A | | | | | | |
| Approach Delay (s/veh) | 11.9 | | | | | | | | 0.1 | | | | | | | |
| Approach LOS | B | | | | | | | | | | | | | | | |

Exhibit B



Eubank Ave.

Seagrove Ave.

Deepwater Ave.

Baypoint Ave.

Proposed Housing Site

Pacific Coast Hwy

Senior Center

55 one-bedroom apartments for seniors experiencing homelessness (plus one manager's unit)

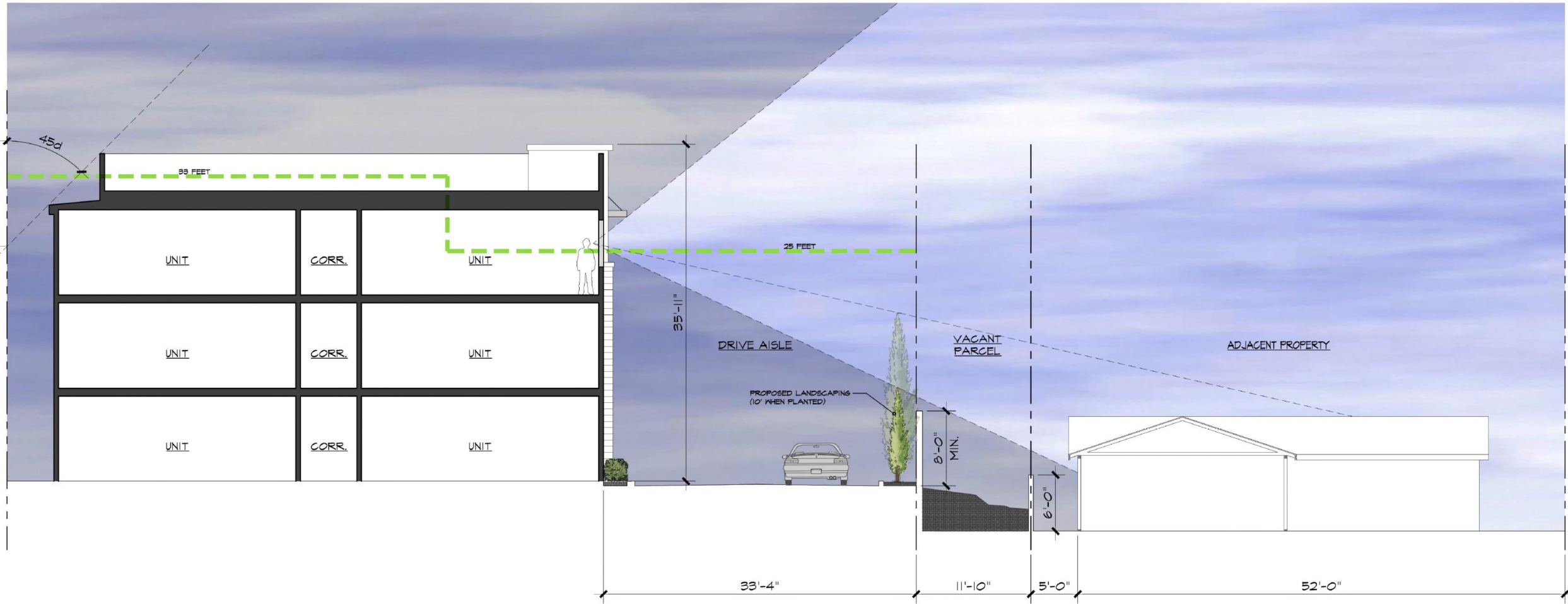


North Elevation



Added landscaping on both sides of the drive aisle

Designed to protect privacy



Line of Sight

Exhibit C

CORRECTIONS TO LETTER OF DETERMINATION

CPC-2018-7329-GPAJ-ZCJ-SPR

CONDITION 33 [INSERT UNDERLINED TEXT]

33. The Applicant shall conduct a subsurface methane investigation in accordance with Los Angeles Department of Building and Safety Document No. P/BC 2014- 101 Site Testing Standards for Methane. The subsurface methane investigation shall include but is not limited to:

- a. Installation of three to four (3-4) gas probes set throughout the Site;
- b. Gas Probe Sets include probes at approximate depths of 5, 10, and 20 feet below ground surface or the lowest building slab elevation;
- c. Collection of methane soil gas and pressure measurements in the field

The purpose of the subsurface methane investigation is to determine the level of methane concentrations that exist at the site, and the level of methane pressure (in inches water pressure) that exists at the site. **If the results of the subsurface methane investigation dictate (based on Table 1A of the Los Angeles Department of Building and Safety LADBS Methane Code)**, the Applicant shall install an Active System and miscellaneous systems subject to the approval of the Los Angeles Department of Building and Safety ("LADBS"), including:

- d. An active mechanical extraction system (i.e., a fan pulling sub-slab air as opposed to active);
- e. Gas detection, alarm, and mechanical ventilation system on the lowest occupied spaces;
- f. A control panel for active/mechanical components;
- g. Additional vent risers.