

**ARMBRUSTER GOLDSMITH & DELVAC LLP**

LAND USE ENTITLEMENTS □ LITIGATION □ MUNICIPAL ADVOCACY

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May 19, 2021

**VIA EMAIL**

Planning and Land Use Management (PLUM) Committee  
Los Angeles City Council  
Attn: Armando Bencomo, Deputy City Clerk, PLUM  
Committee  
200 N. Spring Street, Room 395  
Los Angeles, CA 90012

clerk.plumcommittee@lacity.org

**Re: Case No. CPC-2019-4908-DB-SPR; CF 20-0680 (1309-1331 South Pacific Avenue) – Updated LADOT Assessment Letter**

Honorable Members of the PLUM Committee:

This firm represents RKD 13 PAC., LP (the “Applicant”), the applicant for the above-referenced project (the “Project”) located at 1309-1331 South Pacific Avenue. The Project is the construction of a four-story, 45-foot and five-inch residential building with 102 dwelling units (including 12 Very Low-Income affordable units). This letter supplements the letter our firm submitted to the PLUM Committee on April 16, 2021.

Enclosed is an updated Department of Transportation (DOT) assessment letter, dated May 6, 2021, following DOT’s review of the supplemental traffic impact report for the reduced Project scope, prepared by Linscott, Law & Greenspan, Engineers (LLG). The assessment letter concludes:

The overall trip generation intensity is identical to the previous report and as such, the supplemental review report summarily concludes that the traffic impact analysis findings of the original project proposal is sufficiently applicable to the revised project concept as well. After completing a review of the pertinent data provided in the supplemental VMT report, DOT is providing this traffic impact assessment addendum to confirm its concurrence with this finding.

The assessment letter concludes, further, that “implementation of the Project would not result in a significant Household or Work VMT impact.”

The assessment letter provides further evidence that the Project would not result in any significant traffic impacts.

ARMBRUSTER GOLDSMITH & DELVAC LLP

PLUM Committee of  
The Los Angeles City Council  
May 19, 2021  
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Thank you for your time and consideration of this matter. Please do not hesitate to contact me with any questions.

Sincerely,



Dave Rand

cc: Connie Chauv, Department of City Planning  
Michelle Singh, Department of City Planning  
Susan Ramirez, Department of City Planning  
Jonathan Lonner, Burns & Bouchard  
Damon Mamalakis, AGD  
Danny Mandel, AGD

Enclosure:

Exhibit A – DOT, Addendum to the Traffic Assessment for the Proposed 102 Unit Residential Project Located at 1331 S. Pacific Avenue, May 6, 2021

**ATTACHMENT A**

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

1331 S. Pacific Avenue  
DOT Case No. HRB19-108121 (48281)

Date: May 6<sup>th</sup>, 2021

To: Susan Jimenez, Administrative Clerk  
Department of City Planning

From:   
Robert Sanchez, Transportation Engineer  
Department of Transportation

Subject: **ADDENDUM TO THE TRAFFIC ASSESSMENT FOR THE PROPOSED 102 UNIT RESIDENTIAL PROJECT LOCATED AT 1331 S. PACIFIC AVENUE**

On October 22, 2019, the Department of Transportation (DOT) issued a traffic assessment report to the Department of City Planning (DCP) for a proposed 110-unit residential apartment complex located at 1331 S. Pacific Avenue. On April 15, 2021, DOT received a supplemental traffic impact report for a reduced project scope, prepared by Linscott, Law & Greenspan, Engineers (LLG). Under the revised project concept, the project scope reduced from 110 to 102 apartment units which includes 12 affordable housing units. The overall trip generation intensity is identical to the previous report and as such, the supplemental review report summarily concludes that the traffic impact analysis findings of the original project proposal is sufficiently applicable to the revised project concept as well. After completing a review of the pertinent data provided in the supplemental VMT report, DOT is providing this traffic impact assessment addendum to confirm its concurrence with this finding.

In compliance with SB 743 and the California Environmental Quality Act (CEQA), a vehicle miles traveled analysis is required to identify the project's ability to promote the reduction of green-house gas emissions, access to diverse land uses, and the development of multi-modal networks. The significance of a project's impact in this regard is measured against the VMT thresholds established in DOT's Transportation Assessment Guidelines (TAG), as described below.

#### **DISCUSSION AND FINDINGS**

A. Project Description

The revised project proposal is for the construction of a 102 residential apartment complex consisting of 90 market units and 12 affordable housing units. The existing site is currently occupied by 2,400 square feet of warehouse, 4,000 square feet of light industrial and 1,600 of restaurant/bar. The project buildout year has been revised from 2022 to 2023. The site access and circulation scheme for the project remains the same as stated in the previously approved traffic study. The existing driveway southeast of the project site along Pacific Avenue will be removed. Vehicular access will be provided via the existing driveway along 14<sup>th</sup> Street near the southwest corner of the site as shown in Figure (1) **Attachment A**.

B. CEQA Screening Threshold

Prior to accounting for trip reductions resulting from the application of Transportation Demand

Management (TDM) Strategies, a trip generation analysis was conducted to determine if the project would exceed 250 daily vehicle trips screening threshold. Using the City of Los Angeles VMT Calculator tool, which draws upon trip rate estimates published in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9<sup>th</sup> Edition as well as applying trip generation adjustments when applicable, based on sociodemographic data and the built environment factors of the project's surroundings, it was determined that the project does exceed the net 250 daily vehicle trips threshold. The VMT calculator version 1.3 was the latest VMT calculator available at the time the analysis was submitted and accepted by DOT. A copy of the VMT calculator screening page, with the corresponding net daily trips estimate, is provided as **Attachment B** to this report.

C. Transportation Impacts

On July 30, 2019, pursuant to SB 743 and the recent changes to Section 15064.3 of the State's CEQA Guidelines, the City of Los Angeles adopted VMT as a criteria in determining transportation impacts under CEQA. The new DOT Transportation Assessment Guidelines (TAG) provides instructions on preparing transportation assessments for land use proposals and defines the significant impact thresholds. The updated version of the TAG introduced July 2020, has been refined to reflect consistency with the vehicle miles traveled (VMT) impact methodology.

The DOT VMT Calculator tool measures project impact in terms of Household VMT per Capita, and Work VMT per Employee. DOT identified distinct thresholds for significant VMT impacts for each of the seven Area Planning Commission (APC) areas in the City. For the Harbor APC area, in which the project is located, the following thresholds have been established:

- Household VMT per Capita: 9.2
- Work VMT per Employee: 12.3

As cited in the VMT Analysis report, prepared by Linscott, Law & Greenspan, Engineers (LLG) the work VMT employee is not applicable since the project does not have a commercial component. The estimate Household VMT per capita for the proposed project is 9.2 which does not exceed the Harbor APC threshold of 9.2 VMT per capita. Therefore, it is concluded that implementation of the Project would not result in a significant Household or Work VMT impact. A copy of the VMT Calculator summary reports is provided as **Attachment C** that to this report.

## **PROJECT REQUIREMENTS**

To comply with transportation and mobility goals and provisions of adopted City plans and ordinances, the applicant should be required to implement the following:

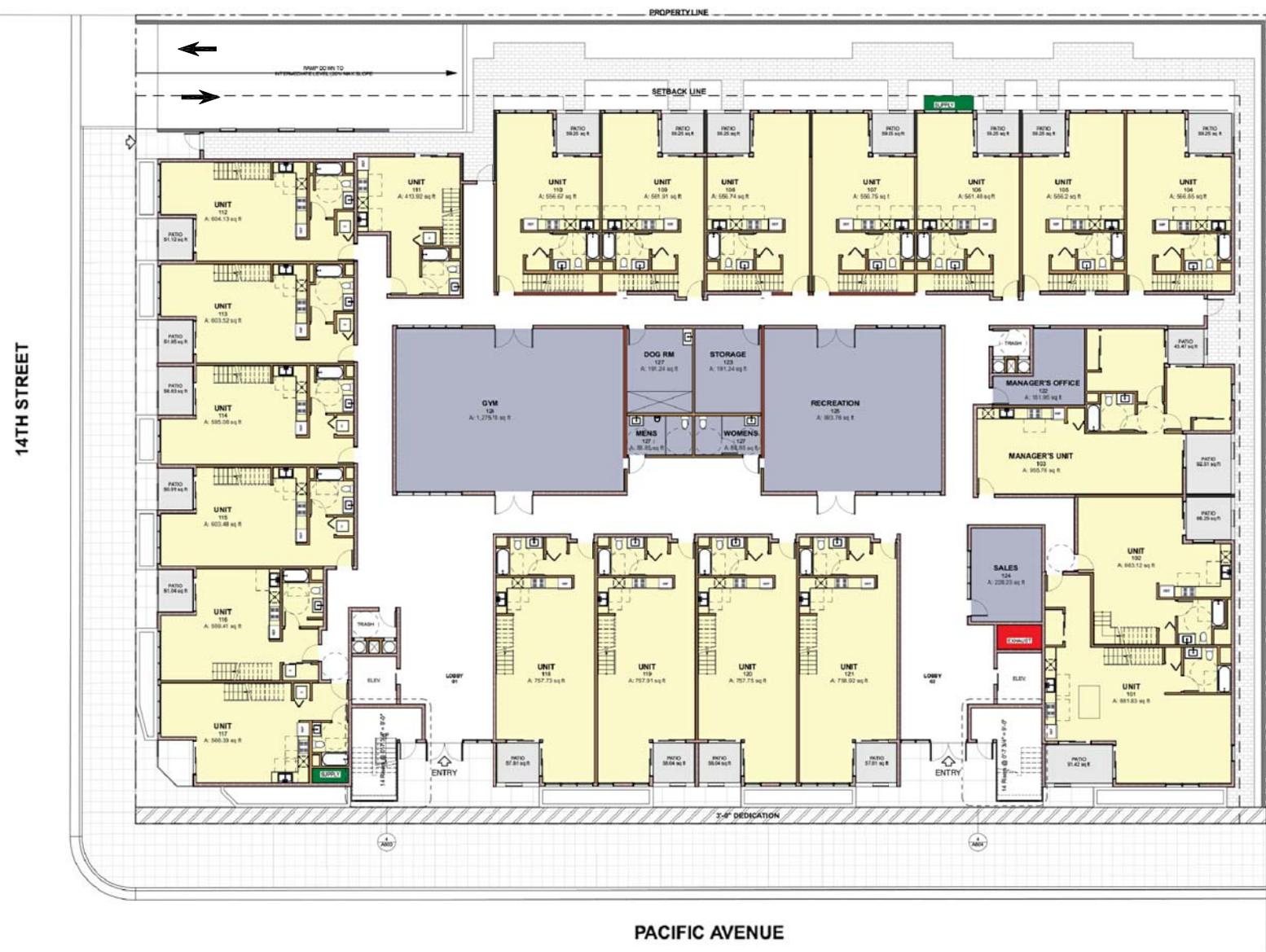
1. Parking Requirements  
Parking for vehicles and bicycles will be provided onsite. The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for this project. The project is proposing to provide 127 parking spaces along with 90 long term and 8 short term bicycle racks.

2. Highway Dedication and Street Widening Requirements  
In order to mitigate potential access and circulation impacts, the applicant may be required to make highway dedications and improvements. The applicant shall consult the Bureau of Engineering (BOE) for any highway dedication or street widening requirements. These requirements must be guaranteed before the issuance of any building permit through the B-permit process of the BOE. They must be constructed and completed prior to the issuance of any certificate of occupancy to the satisfaction of DOT and BOE. In an effort to be consistent with the Mobility Plan 2035, the proposed project plans to dedicate 3 feet along Pacific Avenue.
3. Project Access and Circulation  
The proposed site plan is acceptable to DOT; however, review of the study does not constitute approval of the driveway dimensions and internal circulation schemes. Those require separate review and approval and should be coordinated with DOT's West LA/Coastal Development Review Section (7166 W Manchester Ave, @ 213-485-1062). In order to minimize potential building design changes, the applicant should contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. All new driveways should be Case 2 driveways and any security gates should be a minimum 20 feet from the property line. All truck loading and unloading should take place on site with no vehicles backing into the project from public streets via any of the project driveways.
4. Worksite Traffic Control Requirements  
DOT recommends that a construction work site traffic control plan be submitted to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <http://ladot.lacity.org/what-we-do/plan-review> to determine which section to coordinate review of the work site traffic control plan. 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 truck traffic be restricted to off-peak hours to the extent feasible.
5. Development Review Fees  
Section 19.15 of the LAMC 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 me or Valeria Ceja at (213) 485-1062.

#### Attachments

- c: Jacob Haik, Aksel Palacios, Council District No. 15  
David Weintraub, Department of City Planning  
Roy Kim, Quan Tran, DOT  
Crystal Lee, BOE  
Clare M. Look-Jaeger, Francesca S. Bravo, Linscott, Law & Greenspan, Engineers



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SOURCE: KETTER

NOT TO SCALE

FIGURE 1  
SITE PLAN

# CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



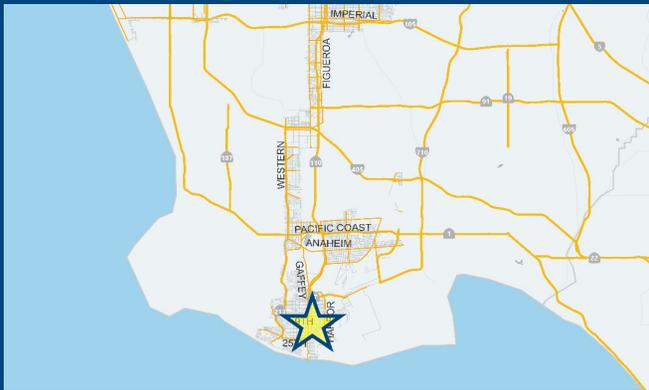
*Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?*

## Project Information

Project:

Scenario:

Address:



Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?

Yes  No

## Existing Land Use

Land Use Type	Value	Unit
Housing   Single Family		DU

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

## Proposed Project Land Use

Land Use Type	Value	Unit
Housing   Affordable Housing - Family	12	DU
Housing   Affordable Housing - Family	12	DU
Housing   Multi-Family	90	DU

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

## Project Screening Summary

Existing Land Use	Proposed Project
0 Daily Vehicle Trips	484 Daily Vehicle Trips
0 Daily VMT	4,164 Daily VMT
<b>Tier 1 Screening Criteria</b>	
Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. <input type="checkbox"/>	
<b>Tier 2 Screening Criteria</b>	
The net increase in daily trips < 250 trips	484 Net Daily Trips
The net increase in daily VMT ≤ 0	4,164 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf
<b>The proposed project is required to perform VMT analysis.</b>	



# CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



## Project Information

Project:

Scenario:

Address:



Proposed Project Land Use Type	Value	Unit
Housing   Affordable Housing - Family	12	DU
Housing   Multi-Family	90	DU

## TDM Strategies

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

	Proposed Project	With Mitigation
Max Home Based TDM Achieved?	No	No
Max Work Based TDM Achieved?	No	No

- A** Parking
- B** Transit
- C** Education & Encouragement
  - Voluntary Travel Behavior Change Program  Proposed Prj  Mitigation  percent of employees and residents participating
  - Promotions & Marketing  Proposed Prj  Mitigation  percent of employees and residents participating
- D** Commute Trip Reductions
- E** Shared Mobility
- F** Bicycle Infrastructure
- G** Neighborhood Enhancement

## Analysis Results

Proposed Project	With Mitigation
<b>484</b> Daily Vehicle Trips	<b>484</b> Daily Vehicle Trips
<b>4,164</b> Daily VMT	<b>4,164</b> Daily VMT
<b>9.2</b> Household VMT per Capita	<b>9.2</b> Household VMT per Capita
<b>N/A</b> Work VMT per Employee	<b>N/A</b> Work VMT per Employee
<b>Significant VMT Impact?</b>	
<b>Household: No</b> Threshold = 9.2 15% Below APC	<b>Household: No</b> Threshold = 9.2 15% Below APC
<b>Work: N/A</b> Threshold = 12.3 15% Below APC	<b>Work: N/A</b> Threshold = 12.3 15% Below APC

