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# 6436 W. Hollywood Blvd Mixed-Use Development Project

Eduardo Hermoso <eduardo.hermoso@lacity.org>

Wed, Jul 25, 2018 at 2:18 PM

To: Luciralia Ibarra < luciralia.ibarra@lacity.org>

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Luciralia,

Minor corrections were made on the assessment letter that was sent out yesterday, July 24th. Attached, is the updated Traffic Impact Study assessment letter. Please rescind the original assessment letter that was sent out.

Thank You.

[Quoted text hidden]

#### Eduardo Hermoso

Transportation Engineer Associate & Metro Development Review

Los Angeles Department of Transportation 213.972.8451

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

# **CITY OF LOS ANGELES**

# INTER-DEPARTMENTAL CORRESPONDENCE

6436 W. Hollywood Blvd DOT Case No. CEN 16-44677

Date:

July 25, 2018

To:

Luciralia Ibarra, Senior City Planner

Department of City Planning

From:

Wes Pringle, Transportation Engineer

**Department of Transportation** 

Subject:

TRANSPORTATION IMPACT ASSESSMENT FOR THE PROPOSED

MIXED-USE DEVELOPMENT PROJECT LOCATED AT 6436 WEST

**HOLLYWOOD BOULEVARD** 

The Department of Transportation (DOT) has reviewed the traffic impact analysis, dated January 2018 prepared by Gibson Transportation Consulting Inc., for the proposed mixeduse development located at 6430-6436 West Hollywood Boulevard and 1624-1648 Wilcox Avenue. In order to evaluate the effects of the project's traffic on the available transportation infrastructure, the significance of the project's traffic impacts is measured in terms of change to the volume-to-capacity (V/C) ratio between the "future no project" and the "future with project" scenarios. This change in the V/C ratio is compared to established threshold standards to assess the project-related traffic impacts. Based on DOT's traffic impact criteria<sup>1</sup>, the traffic study included the detailed analysis of 22 intersections, including 19 signalized and three unsignalized and determined that the project-related traffic would significantly impact one of the study signalized intersections as summarized in Attachment 1. The results of the traffic analysis which accounted for other known development projects in evaluating potential cumulative impacts, adequately evaluated the project's traffic impacts on the surrounding community. The implementation of a Transportation Demand Management (TDM) program and Transportation System Management (TSM) improvements has been proposed to alleviate the effects of this impacted intersection.

## **DISCUSSION AND FINDINGS**

## A. Project Description

The project proposes to develop 260 apartment units, approximately 14,600 square feet (sf) of community serving retail and office space, and approximately 3,200 sf of high turnover sit down restaurant. Approximately 9,000 sf of existing commercial uses would be incorporated into the development and approximately 14,880 sf of office space and approximately 10,520 sf of retail space would be removed. Vehicular access to project site will be accommodated via a new full-access driveway on Wilcox Avenue. The driveway would provide access to on-site parking

<sup>&</sup>lt;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.

within two subterranean levels, one at-grade level and two above grade levels. The project is expected to be completed by year 2023.

## B. Trip Generation

The project is estimated to generate a net increase of approximately 1,625 daily trips, 121 trips during the a.m. peak hour and 143 trips during the p.m. peak hour. The trip generation estimates are based on rates published by the Institute of Transportation Engineers (ITE) <u>Trip Generation</u>, 9<sup>th</sup> Edition, 2012. These trip generation rates are typically derived from surveys of similar stand-alone (single) land use projects in suburban areas with little to no transit service. Therefore, DOT's transportation impact study guidelines allow projects to reduce their total trip generation to account for potential transit usage to and from the site and for the internal-trip making opportunities that are afforded by mixed-use projects. Consistent with these guidelines, the estimated trip generation includes trip credits to account for the mixed-use nature of the project and for the expected transit mode share. A copy of the trip generation table can be found in **Attachment 2**.

# C. 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 December 2015, the study also 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. The project did meet at least one of the four thresholds defined in the agreement; therefore, additional freeway analysis was required. Detailed analyses of the Caltrans facilities indicated that the project traffic would not cause any off-ramp queue to extend onto the freeway mainline.

# D. Traffic Impacts

The study estimates that the project would result in a significant traffic impacts (premitigation) at the intersection of Cahuenga Boulevard and Franklin Avenue during a.m. peak hour under Existing with Project conditions and during a.m. and p.m. peak hours under Future Year 2023 plus Project conditions.

The transportation mitigation program (discussed in the "Project Requirements" section below) would help reduce vehicle trips generated by the Project and fully reduces the significant impact.

## E. Construction Impacts

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.

# **PROJECT REQUIREMENTS**

# A. <u>Transportation Improvement and Mitigation Program</u>

Consistent with City policies on sustainability and smart growth and with DOT's trip reduction and multi-modal transportation goals, the project includes the development of a trip reduction program and solutions that promote other modes of travel. The traffic demand management and mitigation program includes the following improvements:

1. Transportation Demand Management (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 <u>prior</u> to the issuance of the first building permit for this project and a final TDM program approved by DOT is required <u>prior</u> to the issuance of the first certificate of occupancy for the project. The preliminary plan will include, at a minimum, measures consistent with the City's Trip Reduction Ordinance. As recommended by the transportation study, the TDM program could include, but is not be limited to the following:

- Provide an on-site transportation coordinator to promote the TDM program and alternatives to the car and facilitate rideshare;
- Transportation Information Center, educational programs, kiosks and/or other measures:
- Implementation of vehicle trip reduction incentives and services for Project employees and/or tenants; provide on-site education on alternative transportation modes;
- Bicycle amenities such as racks to promote bicycling;
- The project will support existing and/or future efforts for Mobility Hub program in the study area;
- · Preferential rideshare parking location;
- Parking incentives and support for formation of carpools/vanpools;
- Unbundling and lease of parking spaces for residents;
- Record a Covenant and Agreement to ensure that the TDM program will be maintained;
- Contribute a one-time fixed fee contribution of \$25,000 to be deposited into

the City's Bicycle Plan Trust fund to implement bicycle improvements in the vicinity of the project.

Participate as a member in the Hollywood Community TMO, when operational;

In order to assess the project's actual trip generation and any subsequent TDM Plan (if deemed necessary), a traffic monitoring plan will be implemented once the project is built and occupied to equilibrium (i.e., the level at which the owner/management deems maximum occupancy). The monitoring program should be conducted annually to ensure compliance for a period of 3 years. If the project is found to not conform to the trip reduction targets summarized in **Attachment 3**, the project will have an additional year to meet the trip reduction levels. If the project continues to not meet the TDM goals, the City and project staff will cooperate on implementing further TDM Strategies. The final traffic monitoring plan and TDM Plan will be prepared for and approved by the LADOT prior to the issuance of the first certificate of occupancy for the project.

# 2. Transportation System Management (TSM) Improvements

The project would contribute up to \$270,000 toward TSM improvements within the Hollywood-Wilshire District that may be considered to better accommodate intersection operations and increase intersection capacity throughout the study area.

LADOT's ATSAC Operation and Communication Section has identified the need for the installation of new 3-inch conduits with new two 25-pair interconnect cables and 48SM fiber optic cables. The installation of the new 3-inch conduits with new interconnect / fiber optic cables will be from the existing ATSAC communication hub located at the Los Angeles Police Department (LAPD) Hollywood Station (1358 Wilcox Ave, Los Angeles 90028) to the intersection at Highland Avenue and Hollywood Boulevard. The propose 3-inch conduits route will be from the existing ATSAC communication hub, east to Cahuenga Boulevard, north to Hollywood Boulevard, and east to Highland Avenue. The installation of new interconnect/ fiber optic cables would improve to the network capacity to better utilize adaptive traffic signal control, additional closed circuit television (CCTV) cameras to real-time video monitoring of intersection, corridor, transit, and pedestrian operations within the Hollywood area. Collectively, these TSM improvements provide a system wide benefit by reducing delays experienced by motorists at study intersections.

Should the project be approved, then a final determination on how to implement the TSM improvements listed above will be made by DOT prior to the issuance of the first building permit. These TSM improvements will be implemented **either** by the applicant through the B-Permit process of the Bureau of Engineering (BOE), **or** through payment of a one-time fixed fee of **\$270,000** to DOT to fund the cost of the upgrades. If DOT selects the payment option, then the applicant would be required to pay **\$270,000** to DOT, and DOT shall design and construct the upgrades.

If the upgrades are implemented by the applicant through the B-Permit process, then these TSM improvements must be guaranteed <u>prior</u> to the issuance of any building permit and completed <u>prior</u> to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the events 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.

# B. Implementation of Improvements and Mitigation Measures

The applicant should be responsible for the cost and implementation of any necessary traffic equipment modifications, bus stop relocations and lost parking meter revenues associated with the proposed TSM improvements described above. All proposed TSM improvements within the City of Los Angeles must be guaranteed through BOE's B-Permit process, prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, at (213) 972-8687, to arrange a pre-design meeting to finalize the proposed design. Costs related to any relocation of bus zones and shelters, and to modifying or upgrading traffic equipment and that are necessary to implement the proposed mitigations shall be incurred by the applicant.

If a proposed traffic mitigation measure does not receive the required approval during plan review, a substitute mitigation measure may be provided subject to the approval of LADOT or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is environmentally equivalent or superior to the original measure in mitigating the project's significant traffic impact. To the extent that a mitigation measure proves to be infeasible and no substitute mitigation is available, then a significant traffic impact would remain.

# C. <u>Highway Dedication and Street Widening Requirements</u>

On January 20, 2016, the City Council adopted the Mobility Plan 2035 which represents 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, Hollywood Boulevard has been designated as an Avenue I which would require a 35-foot half-width roadway within a 50-foot half-width right-of-way and Wilcox Avenue has been designated as a Modified Avenue III which would require a 20-foot half-width roadway within a 35-foot half-width right-of-way. The applicant should check with Bureau of Engineering's Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project.

# D. Parking Requirements

The traffic study indicated that the project would provide a total of 420 vehicle parking spaces and 304 bicycle parking spaces on-site. The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for the project.

#### E. Driveway Access and Circulation

The proposed site plan illustrated in Attachment 4 is acceptable to DOT; however, review of the study does not constitute approval of internal circulation schemes and driveway dimensions. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 5th Floor, Station 3, @ 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. Any changes to the project's site access. circulation scheme, or loading/unloading area after issuance of this report would require separate review and approval and should be coordinated as well.

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#### F. 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 Eduardo Hermoso at (213) 972-8451.

#### Attachments

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Amy Ablakat, Council District 13 C: Bhuvan Bajaj, Hollywood-Wilshire District Office, DOT Taimour Tanavoli, Case Management Office, DOT Carl Mills, BOE Development Services Emily Wong, Gibson Transportation Consulting, Inc.

TABLE 10
FUTURE WITH PROJECT CONDITIONS (YEAR 2023)
SIGNIFICANT IMPACT ANALYSIS

			Future with	Future without Project	F	ture with Pro	Future with Project Conditions	lls.
	Intersection	Peak Hour	N/C	FOS	V/C	FOS	Change in V/C	Significant
1.	Cahuenga Boulevard & US-101 NB Off-Ramp	AM a	0.411	∢ (	0.422	∢ (	0.011	Q :
٦	Wilcov Avenue &	MV	0.733	ا د	0.759	ا اد	0.006	ON S
j	Franklin Avenue	PM A	0.703	шΟ	0.909	υС	0.005	99
ь,	Cahuenga Boulevard &	AM	1.098	L	1.115		0.017	YES
	Franklin Avenue	PM	1.019	ш	1.031	. ц.	0.012	YES
4.	Vine Street &	AM	0.369	A	0.370	A	0.001	2
	Franklin Avenue / US-101 SB Off-Ramp	PM	0.445	A	0.447	A	0.002	ON.
ري غ	Argyle Avenue / US-101 NB On-Ramp &	AM	0.806	۵	0.807	۵	0.001	2
	Franklin Avenue	PM	0.803	۵	0.803	۵	0.000	ON.
9	Wilcox Avenue &	AM	0.449	A	0.455	A	900'0	ON ON
١	Yucca Street	PM	0.387	∢	0.397	٧	0.010	ON
7.	Cahuenga Boulevard &	AM	0.599	∢ :	0.603	В	0.004	ON ON
,	Tucca Street	MA.	0.642	В	0.643	В	0.001	ON O
no.	Vine Street &	AM	0.620	<u>m</u>	0.623	Δ	0.003	ON
(	ותרכם אוופפו	Σ	0.617	20	0.619	В	0.002	Q.
ni Di	Argyle Avenue &	A S	0.293	∢ •	0.297	⋖	0.004	ON ON
	rucca street	PM	0.474	4	0.475	∢	0.001	NO
10.	Highland Avenue &	AM	0.984	*	0.988	* Ľ	0.004	ON
]	Hollywood Boulevard	PM	0.951	*	0.958	* L	0.007	ON
	Whitley Avenue &	AM	0.531	∢	0.534	٧	0.003	ON
]	Hollywood Boulevard	Md.	0.465	A	0.467	∢	0.002	ON
72	Wilcox Avenue &	AM	0.871	Δ	0.883	۵	0.012	ON
	Hollywood Boulevard	PM	0.735	O	0.752	S	0.017	ON N
<u>(,,</u>	Cahuenga Boulevard &	AM	996.0	*	0.973	*	0.007	Q.
[	Hollywood boulevard	PM	0.815	*	0.823	*	0.008	<u>Q</u>
4.	Vine Street &	AM	0.925	* ·	0.927	* IL	0.002	ON N
7	Tollywood boulevard	E. P.	0.937	*	0.942	*	0.005	2
<u>.</u>	Argyle Avenue &	AM :	0.698	ш ·	669'0	ш	0.001	<u>Q</u>
,	Hollywood boulevard	PM	0.727	ပ	0.731	O	0.004	ON.
76.	Wilcox Avenue &	AM	0.383	۷	0.399	4	0.016	ON ON
ļ	Seima Avenue	Md	0.516	A	0.537	V	0.021	ON
٦٧.	Cahuenga Boulevard &	AM	0.531	Α.	0.534	ď	0.003	ON
Ş	Sellia Avenue	E P	0.549	∢	0.551	4	0.002	<u>Q</u>
<u>o</u>	VVIICOX AVenue & Sinset Rollevand	AM	0.660	م م	0.675	<u>aa</u> (	0.015	2 :
10	Cohiona Bailanail B	M	0.700	١	0.708	اد	0.008	2
6	Sunset Boulevard	A A	0.864	* *	0.980	* *	0.003	2 2
			41001		0,000	-	0,000	2

# Notes \*

USS based on field observations, as the CMA methodology for Individual intersections does not in every case account for vehicular queues along corridors, pedestrian, conflicts, etc., and thus, the calculated average operating conditions may appear better than is observed.

#### TABLE 8 TRIP GENERATION

	ITE Land	0:	D.7	/	AM Peak Hou	ır	i	PM Peak Hou	r
Land Use	Use	Size	Daily	In	Out	Total	ln	Out	Total
Trip Generation Rates [a]									
Apartment	220	per du	6,65	20%	80%	0.51	65%	35%	0.62
General Office	710	per ksf	11,03	88%	12%	1.56	17%	83%	1.49
Shopping Center	820	per ksf	42.70	62%	38%	0,96	48%	52%	3.71
High-Turnover Restaurant	932	per ksf	127.15	55%	45%	10.81	60%	40%	9.85
Proposed Project									
Apartment	220	260 du	1,729	27	106	133	105	56	161
Less 15% Transit/Walk-In Reduction [b]			(259)	(4)	(16)	(20)	(16)	(8)	(24)
Subtotal - Apartment			1,470	23	90	113	89	48	137
Office	710	3.58 ksf	39	5	1	6	1	4	5
Less 15% Transit/Walk-In Reduction [b]			(6)	(1)	0	(1)	0	(1)	(1)
Subtotal - Office	1		33	4	1	5	1	3	4
				1755					
Retail	820	11,02 ksf	471	7	4	11	20	21	41
Less 5% Internal Capture Reduction [c]			(24)	0	0	0	(1)	(1)	(2)
Less 15% Transit/Walk-In Reduction [b]			(67)	(1)	(1)	(2)	(3)	(3)	(6)
Less 20% Pass-by Reduction [d]			(76)	(1)	(1)	(2)	(3)	(3)	(6)
Subtotal - Retail			304	5	2	7	13	14	27
	1		107	10	4.0	0.5	4.0	10	
Restaurant	932	3.2 ksf	407	19	16	35	19	13	32
Less 5% Internal Capture Reduction [c]	F		(20)	(1)	(1)	(2)	(1)	(1)	(2)
Less 15% Transit/Walk-In Reduction [b]			(58)	(3)	(2)	(5)	(3)	(2)	(5)
Less 20% Pass-by Reduction [d]			(66)	(3)	(3)	(6)	(3)	(2)	(5)
Subtotal - Restaurant			263	12	10	22	12	8	20
Total - Proposed Project			2,070	44	103	147	115	73	188
Existing Uses to be Removed									
Office	710	14.88 ksf	164	20	3	23	4	18	22
Less 15% Transit/Walk-In Reduction [b]			(25)	(3)	0	(3)	(1)	(3)	(4)
Subtotal - Office			139	17	3	20	3	15	18
Retail	820	10.52 ksf	449	6	4	10	19	20	39
Less 15% Transit/Walk-In Reduction [b]			(67)	(1)	(1)	(2)	(3)	(3)	(6)
Less 20% Pass-by Reduction [d]		1	(76)	(1)	(1)	(2)	(3)	(3)	(6)
Subtotal - Retail			306	4	2	6	13	14	27
Total - Existing Uses to be Removed			445	21	5	26	16	29	45
Total - Net New Project Trips			1,625	23	98	121	99	44	143

Notes

du: dwelling units
ksf: 1,000 square feet
[a] Source: Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.

<sup>[</sup>a] Source: rnp veneration, wn Edition, institute of transportation Engineers, 2012.
[b] The Project site is located within a 1/4 mile of the Metro Red Line Hollywood/Vine station and a Metro RapidBus stop (Line 780), therefore a 15% transit adjustment was applied, per Traffic Study Policies and Procedures (LADOT, August 2014).
[c] Internal capture adjustments account for person trips made between distinct land uses within a mixed-use development (i.e., between residents and retail).
[d] Pass-by adjustments account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.

TABLE 11 TRIP GENERATION WITH TDM PROGRAM REDUCTION

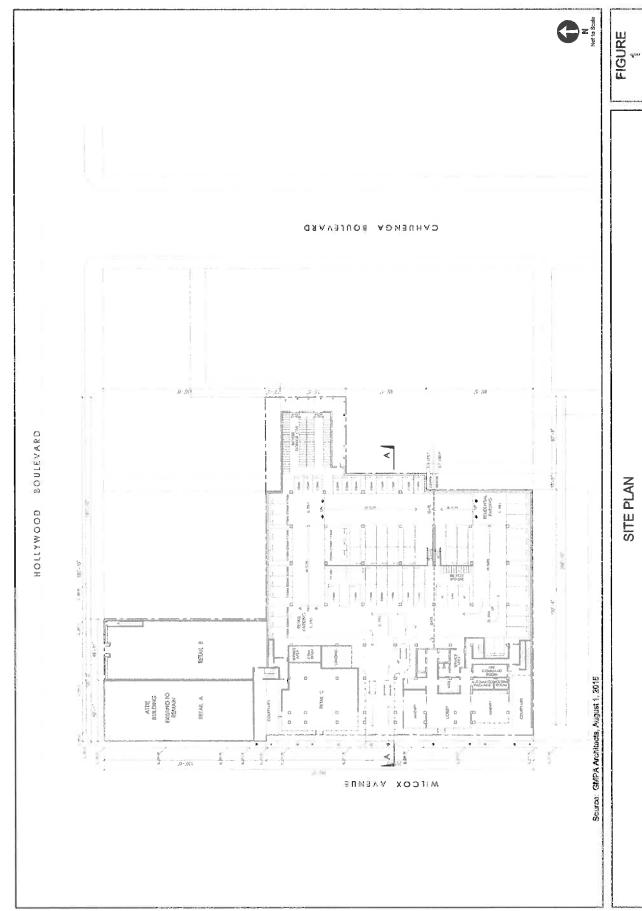
Land Use	ITE Land	Size	Daily		AM Peak Ho			PM Peak Ho	
	Use			In	Out	Total	In	Out	Total
Proposed Project									
Apartment	220	260 du	1,729	27	106	133	105	56	161
Less 15% Transit/Walk-In Reduction [b]			(259)	(4)	(16)	(20)	(16)	(8)	(24)
Subtotal - Apartment			1,470	23	90	113	89	48	137
			1		<b></b>	<del> </del>	1	†	
Office	710	4 ksf	39	5	1	6	1	4	5
Less 15% Transit/Walk-In Reduction [b]			(6)	(1)	0	(1)	0	(1)	(1)
Subtotal - Office			33	4	1	5	1	3	4
Retail	820	11 ksf	471	7	4	11	20	21	41
Less 5% Internal Capture Reduction [c]			(24)	0	0	0	(1)	(1)	(2)
Less 15% Transit/Walk-In Reduction [ь]			(67)	(1)	(1)	(2)	(3)	(3)	(6)
Less 20% Pass-by Reduction [d]			(76)	(1)	(1)	(2)	(3)	(3)	(6)
Subtotal - Retail			304	5	2	7	13	14	27
Restaurant	932	3 ksf	407	19	16	35	19	13	32
Less 5% Internal Capture Reduction [c]			(20)	(1)	(1)	(2)	(1)	(1)	(2)
Less 15% Transit/Walk-In Reduction [b]			(58)	(3)	(2)	(5)	(3)	(2)	(5)
Less 20% Pass-by Reduction [d]			(66)	(3)	(3)	(6)	(3)	(2)	(5)
Subtotal - Restaurant			263	12	10	22	12	8	20
Total - Proposed Project			2,070	44	103	147	115	73	188
TDM Program									
Apodement									1
Apartment			(204)	(2)	(4.4)	(47)	(42)	(7)	(20)
Less 15% TDM Program Reduction			(221)	(3)	(14)	(17)	(13)	(7)	(20)
Office									
Less 15% TDM Program Reduction			(5)	(1)	0	(1)	0	0	0
Retail									
Less 15% TDM Program Reduction			(46)	(1)	0	(1)	(2)	(2)	(4)
Restaurant									
Less 15% TDM Program Reduction			(39)	(2)	(2)	(4)	(2)	(1)	(3)
								. ,	1.7
Total - TDM Reduction			(311)	(7)	(16)	(23)	(17)	(10)	(27)
Total - Existing Uses to be Removed [e]			(445)	(21)	(5)	(26)	(16)	(29)	(45)
Total - Net New Project Trips with TDM Program			1,314	16	82	98	82	34	116

Notes
du: dwelling units
ksf: 1,000 square feet
[a] Source: Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.

<sup>[</sup>b] The Project site is located within a 1/4 mile of the Metro Red Line Hollywood/Vine station and a Metro RapidBus stop (Line 780), therefore a 15% transit adjustment was applied, per Traffic Study Policies and Procedures (LADOT, August 2014).
[c] Internal capture adjustments account for person trips made between distinct land uses within a mixed-use development (i.e., between residents and retail).

<sup>[</sup>d] Pass-by adjustments account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.
[e] See Table 8.





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