



Hirsch/Green Transportation Consulting, Inc.

December 20, 2023

Mr. Walter Marks
Walter N. Marks, Inc.
Helms Hall of Fame
8758 Venice Boulevard, Suite 100
Los Angeles, California 90034

RE: Non-CEQA Transportation Analysis Updates for Proposed Mirabel Mixed-Use Project
at 688 S. Cochran Avenue in the Miracle Mile Community of the City of Los Angeles

Dear Mr. Marks,

This document provides updates to the “non-CEQA” local transportation impact analyses for the proposed Mirabel mixed-use project at 688 S. Cochran Avenue in the Miracle Mile community of the City of Los Angeles, to bring it current with the publication of the Notice of Preparation (“NOP”) for the project’s Sustainable Communities Environmental Impact Report (“SCEIR”). As you know, the NOP was published on August 31, 2023, with its required 30-day public comment period ending on October 2, 2023. The close of the NOP public comment period typically defines the “cutoff” date for the collection of data and/or identification of other related information to be used in the preparation of the various technical studies contained in the project’s SCEIR.

A detailed traffic impact assessment (“TIA”) was prepared for the project in May of 2022, and is incorporated herein in its entirety by reference. The project evaluated in that study contained a total of 348 residential units (including 29 “very low income” and nine “moderate income” units) and 12,821 square feet of commercial floor area (7,378 square feet of retail, 4,443 square feet of restaurant space, and a 1,000 square foot café). The May 2022 TIA, which was reviewed by the City of Los Angeles Department of Transportation (“LADOT”) and approved on May 23, 2022, concluded that the project was consistent with all applicable City plans, programs, and policies related to providing and maintaining a sustainable transportation network, and would not result in any significant vehicle miles traveled (“VMT”) impacts or other undesirable traffic-related effects under the City’s adopted (CEQA-compliant) transportation impact analysis standards.

However, following LADOT’s approval of the May 2022 TIA, the project’s residential component was modified to convert the “moderate income” units (provided voluntarily) to “market-rate” units, although there were no changes to the project’s “commercial” component (either uses or sizes), vehicular or bicycle parking supply, or site vehicular access (driveway) locations or operations. The potential effects of this modification on the proposed project’s VMT and trip generation levels were evaluated in a brief technical memorandum (dated “August 9, 2023”) prepared by our firm, which is also included in this document in its entirety by reference. In addition to incorporating the

change in the project's description, these supplemental evaluations also provided updates to the VMT and trip generation estimates for both the proposed project and existing site uses identified in the May 2022 TIA, utilizing Version 1.4 of LADOT's VMT Calculator tool (which was released after completion of the May 2022 TIA) along with trip generation rates and data identified in the (current) 11th Edition of the Institute of Transportation Engineers' ("ITE") *Trip Generation* manual (replacing the 10th Edition *Trip Generation* manual data used in the May 2022 study).

The results of these supplemental August 9, 2023 evaluations indicated that, due primarily to the use of the updated trip generation rates, the "revised" project would exhibit reductions in both its VMT and trip generation levels compared to the "original" project analyzed in the May 2022 TIA. Additionally, the changes to the "original" project are minimal, and would not affect the conclusions of the May 2022 TIA that the project is compatible with or will not preclude the implementation of any of the City's sustainable transportation network policies. Further, since the May 2022 TIA did not identify any undesirable effects on any of the streets or intersections in the project vicinity, no updates to the "non-CEQA" local transportation analyses were deemed necessary at that time, as they continued to provide a "worst case" assessment of the project's potential traffic impacts. It is also of note that the VMT and trip generation evaluations for the "revised" project detailed in the August 9, 2023 technical letter do not need to be updated due to the finalization of the NOP, since as discussed earlier, the VMT and trip generation calculations provided in that study reflect the "revised" project description, and utilize the current LADOT traffic analysis methodologies.

However, a recent review of the City's files indicated that, in the interim between the completion of the project's May 2022 TIA and the October 2, 2023 close of the NOP public comment period, applications for two new "related projects" within the project study area had been filed. Although the new traffic generated by any additional related projects not included in the original analyses is typically subsumed into the "background" (future without project) traffic conditions, and therefore does not substantially affect the proposed project's incremental traffic impacts, these new projects are both located within one block of the Mirabel project. As such, the traffic from these projects could alter the "future" operations of the two study intersections evaluated in the May 2022 TIA, which in turn, could potentially result in different conclusions regarding the project's traffic impacts. As a result, the updates provided in this document focus on the effects of the traffic generated by the two new related projects on the operations and service levels of the two study intersections analyzed in the May 2022 TIA, as well as on the proposed project's own traffic-related impacts.

The updates to the ("non-CEQA") traffic impact analyses for the revised project are discussed in detail in the following pages of this report. However, to briefly summarize the conclusions of the updated analyses, the inclusion of the new related projects would produce only minor changes to the study intersection operations, and more importantly, the "revised" project would not result in any undesirable traffic-related effects on the transportation network in the study area. Therefore, the conclusions of the May 2022 TIA remain valid, and no further analyses are warranted.

“Revised” Project Trip Generation and Assignment Updates

As briefly noted earlier in this document, the trip generation calculations for the “revised” project, which include updates based on data from the 11th Edition of the ITE’s *Trip Generation* manual¹, are described in detail in the August 9, 2023 technical letter, with those trip estimates now used as the basis for the updates to the “non-CEQA” traffic impact analyses contained in this report. These updated “revised project” trip generation estimates are summarized in the following pages, along with detailed discussions of the assumptions and analysis methodologies used to update the existing and future conditions at the two study intersections analyzed in the May 2022 TIA.

“Revised” Project Trip Generation Calculations (per August 9, 2023 update)

The assumptions and methodologies used to estimate the vehicular trip generation levels for the “revised” project are described in the August 9, 2023 technical letter, which identified that the project itself would generate approximately 2,260 daily trips, including a total of about 145 trips during the AM peak hour, and a total of about 181 trips during the PM peak hour. These values equate to reductions of 167 trips per day, 13 AM peak hour trips, and six PM peak hour trips compared to the “original” project. Additionally, the August 9, 2023 trip generation updates for the existing site uses indicated that they produce a total of approximately 2,401 trips per day, including about 120 trips during the AM peak hour and about 213 trips during the PM peak hour, which represent *increases* compared to the estimates from the May 2022 TIA of 170 daily trips, 16 AM peak hour trips, and 28 PM peak hour trips. Therefore, based on the updated estimates, the “revised” project would generate 337 fewer daily trips, 29 fewer (total) AM peak hour trips, and 34 fewer (total) PM peak hour trips than the “original” project analyzed in the May 2022 TIA. Summaries of the trip estimates for the “revised” project (per the August 9, 2023 update) and “original” project (from the May 2022 TIA), and a comparison of their overall and component trips, are provided in Tables A-1(a) and A-1(b), respectively, in Attachment A of this document.

“Revised” Project Trip Assignment Procedures and Results

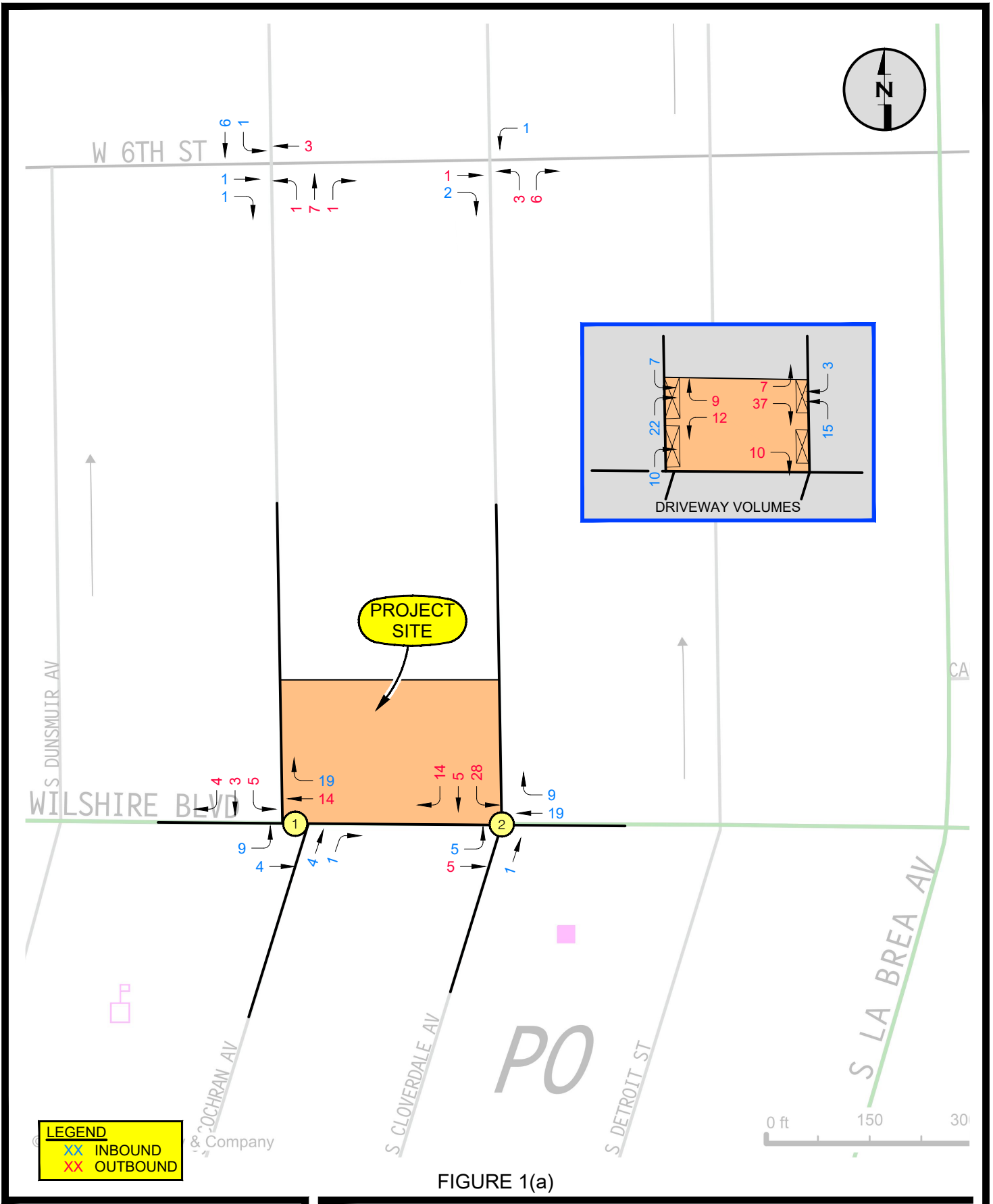
The trips generated by both the proposed (“revised”) project and the existing site uses shown in Tables A-1(a) and A-1(b) were assigned to the study area streets and intersections utilizing the same assumptions and methodologies described in detail in the May 2022 TIA. Note that, since the “revised” project generates both fewer “gross” trips and “net” trips than the “original” project, the study intersections and other parameters for the trip assignment procedures remain identical to those used in the May 2022 TIA. Further, as also discussed in that study, and as identified in the trip generation summary tables in Attachment A, the trips generated by both the “original” and “revised” projects are separated into “primary” and “ride-service” trips, in order to accurately assign these various trips to the appropriate project driveways (as noted in the May 2022 TIA, the project provides separate driveways for each of these two distinct types of project trips).

¹ *Trip Generation*, 11th Edition, Institute of Transportation Engineers, Washington, D.C., September 2021.

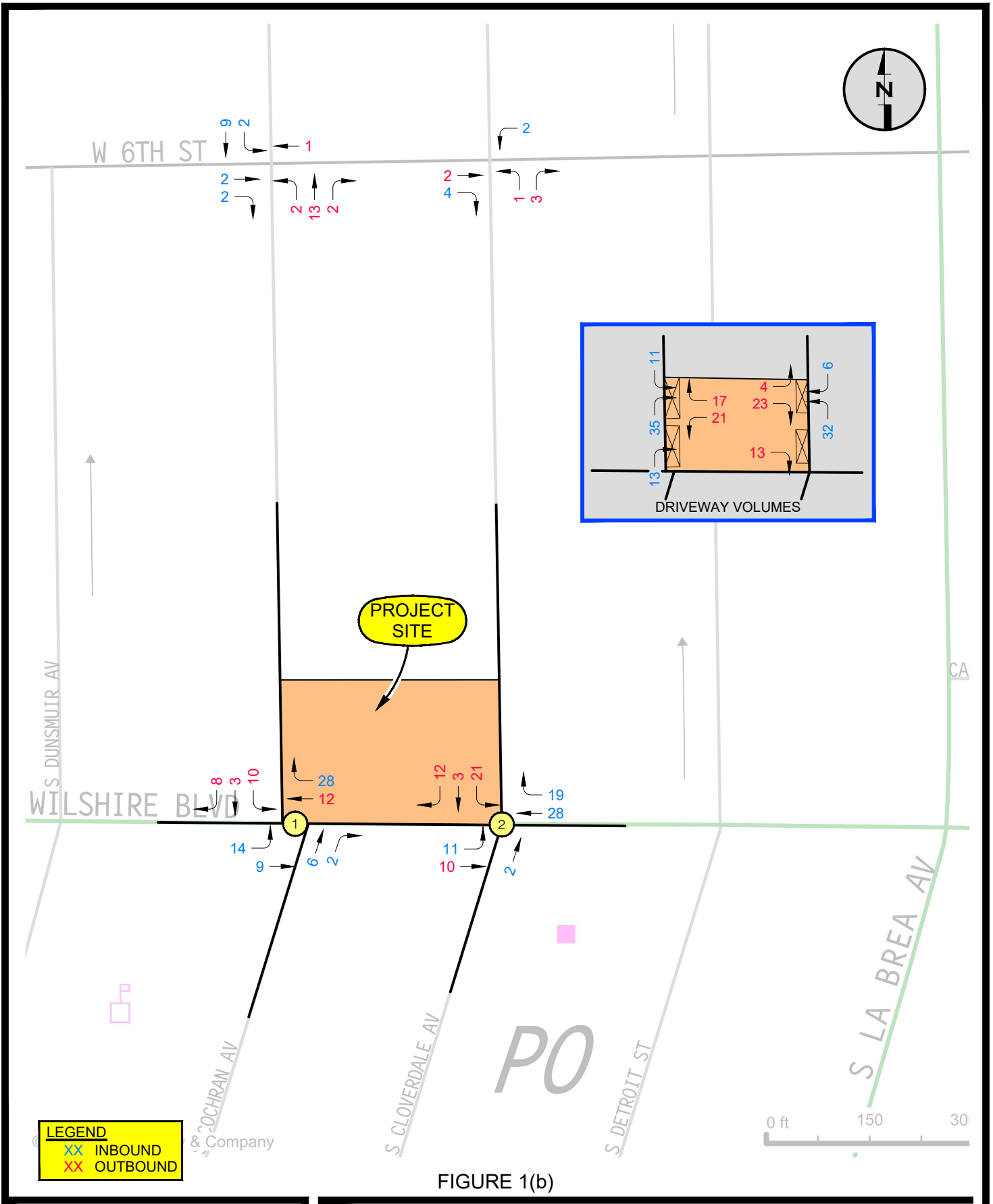
Specifically, the project's residential and commercial uses will access the on-site parking garage via separate driveways, with the "residential" driveway located on Cloverdale Avenue, and the "commercial" driveway located on Cochran Avenue. As noted earlier, the project also includes an on-site drop-off/pick-up area for project-related "ride-service" vehicles, accessed exclusively by a right-turn only entry driveway on Cochran Avenue and a right-turn only exit driveway on Cloverdale Avenue; these "ride-service" vehicle driveways are separate from the residential and commercial component "primary" trip driveways. As a result of these driveway access restrictions, the project's "ride-service" trips exhibit different travel patterns than the project's "primary" trips. Additionally, as also described in the May 2022 TIA, the trips generated by the existing site uses exhibit slightly different site access patterns than either of the proposed project's component uses, and as such, separate trip assignment assumptions were identified for the trips associated with the existing Staples store and the remaining on-site commercial uses (5401 Wilshire Boulevard).

The trip assignment percentages for both the "revised" project and existing site uses are identical to those in the May 2022 TIA, and are reiterated in Attachment B of this report for convenience. The project's residential component "primary" and "ride-service" trip assignment percentages at the two study intersections are shown in Figure B-1(a), while the assignment percentages for its commercial component "primary" and "ride-service" trips are shown in Figure B-1(b). Similarly, the trip assignment percentages for the existing Staples store and other on-site commercial uses ("5401 Wilshire") are both shown in Figure B-2; since any "ride-service" trips for the existing uses are included in their trip calculations, separate "ride-service" trip assignments are not necessary.

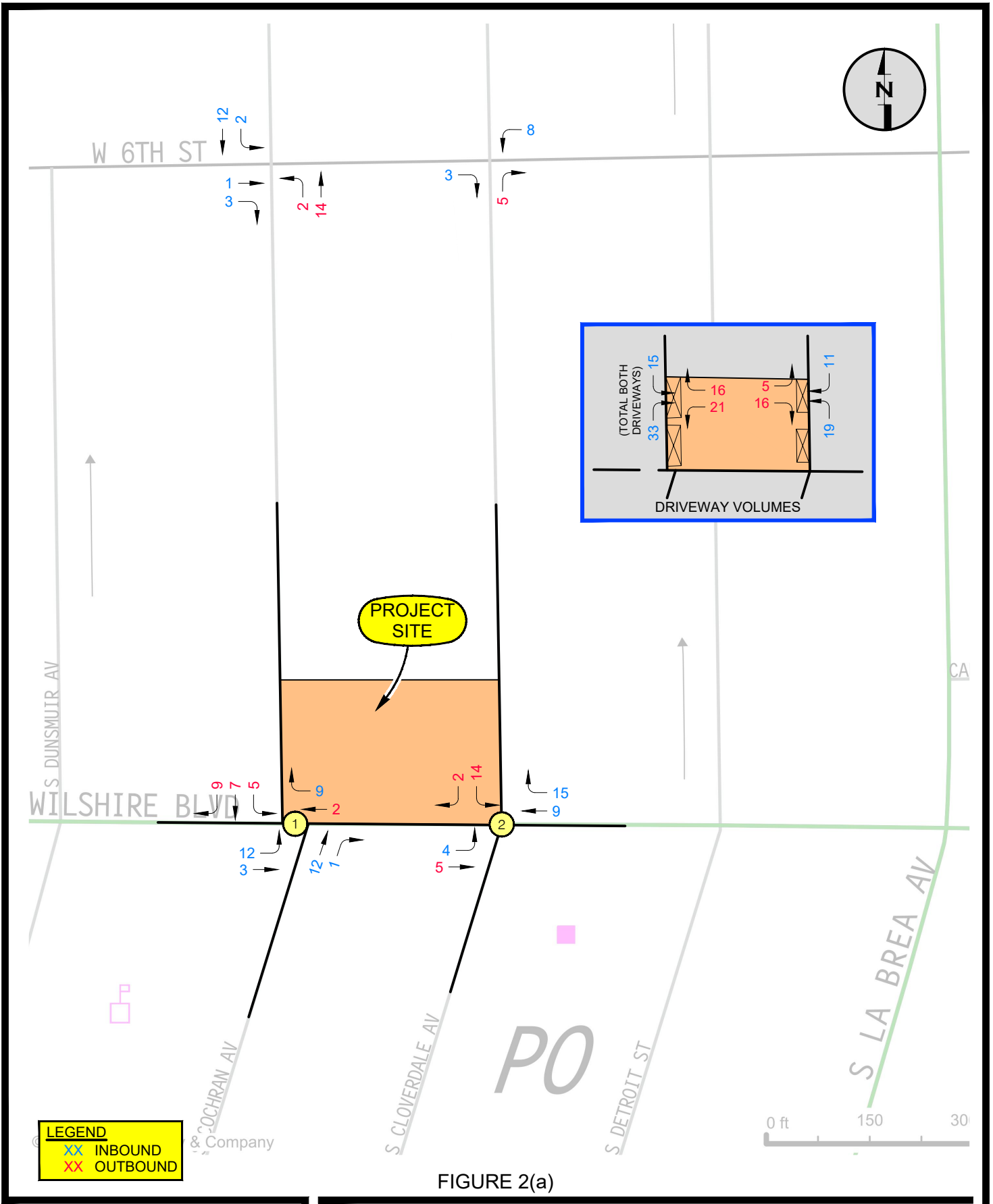
Based on these trip assignment percentages, the number of trips associated with each of the various "revised" project components and existing site uses at each of the study intersections was identified. This process involved multiplying the AM and PM peak hour trips for each of the proposed project's components and existing site uses by the appropriate assignment percentages (including individual "primary" and "ride-service" trips for each project component, as applicable). The results of this procedure for each of the individual project components and existing site uses are shown in Attachment C, while the total traffic at the study intersections and site driveways related to the proposed ("revised") project itself are shown in Figure 1(a) for the AM peak hour and Figure 1(b) for the PM peak hour. Similarly, the total AM and PM peak hour intersection and driveway volumes for the existing site uses are shown in Figures 2(a) and 2(b), respectively. The total net project-related traffic volumes at each of the study intersections and site driveways are shown in Figure 3(a) for the AM peak hour and Figure 3(b) for the PM peak hour conditions. The "net" project trips shown in Figures 3(a) and 3(b) were used to evaluate the potential effects of the "revised" project on the area transportation network, as described later in this document. Finally, the "revised" project's total AM and PM driveway traffic volumes are shown in Figure 4; note that these values are identical to those shown in Figures 1(a) and 1(b), but are superimposed on the project's site plan in Figure 4 in order to specifically identify the anticipated traffic demands at each of the project's various residential, commercial, and "ride-service" access driveways.

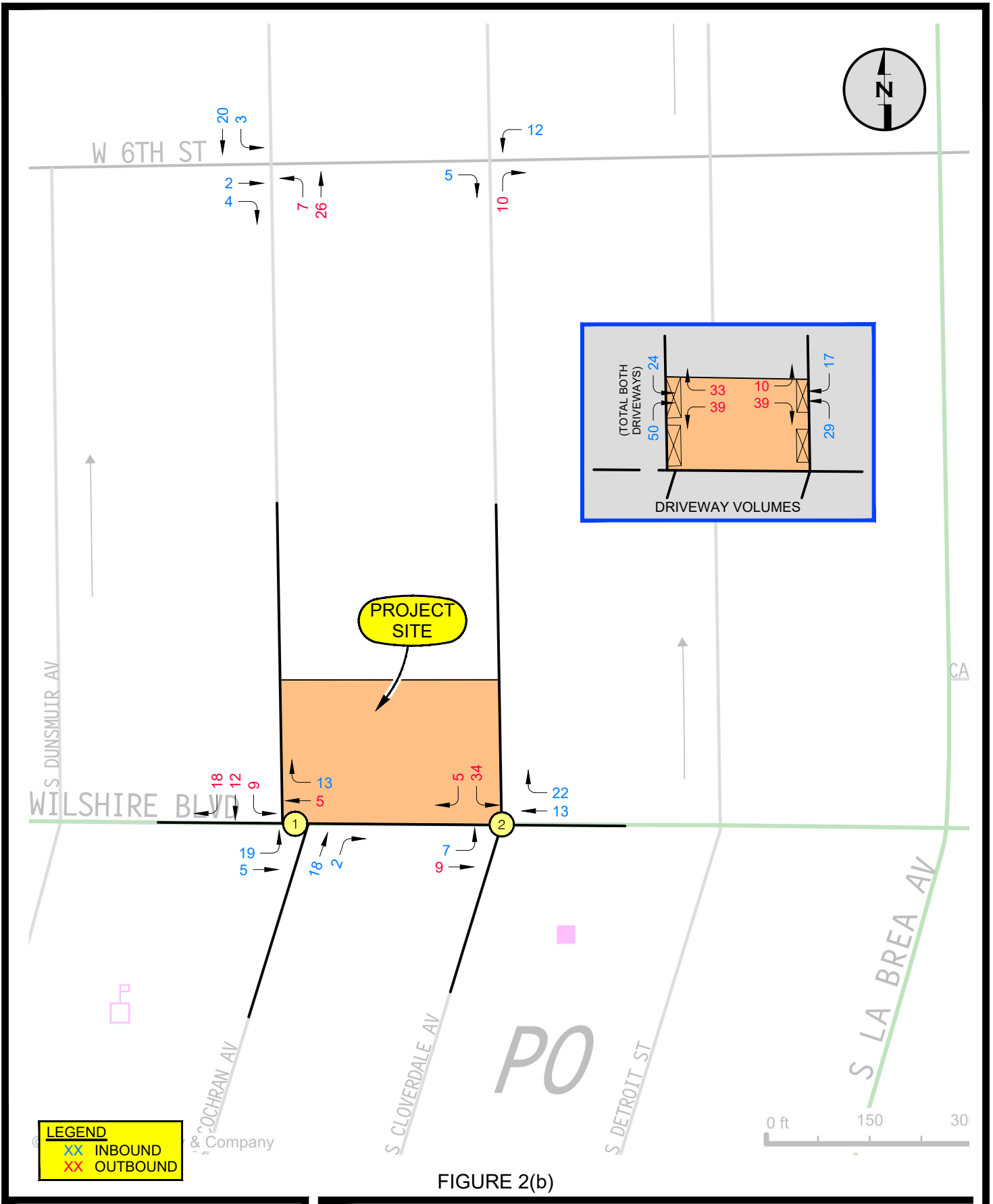


688 S. COCHRAN AVENUE
 PROJECT TRAFFIC VOLUMES
 TOTAL "REVISED" PROJECT TRIPS
 AM PEAK HOUR



688 S. COCHRAN AVENUE
 PROJECT TRAFFIC VOLUMES
 TOTAL "REVISED" PROJECT TRIPS
 PM PEAK HOUR





688 S. COCHRAN AVENUE
 PROJECT TRAFFIC VOLUMES
 TOTAL EXISTING ON-SITE COMMERCIAL USES TRIPS
 PM PEAK HOUR

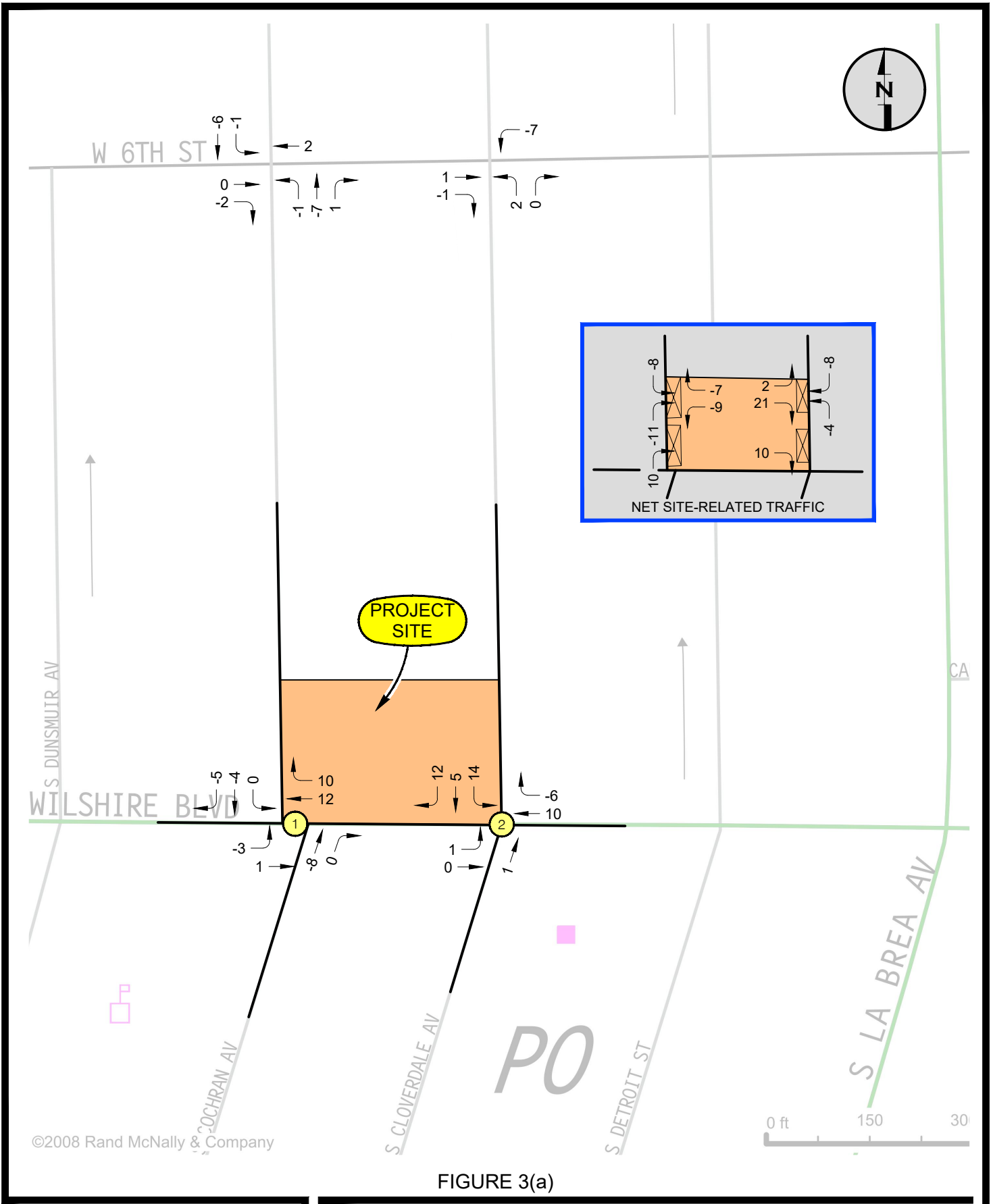


FIGURE 3(a)

688 S. COCHRAN AVENUE
PROJECT TRAFFIC VOLUMES
TOTAL NET "REVISED" PROJECT TRIPS
AM PEAK HOUR



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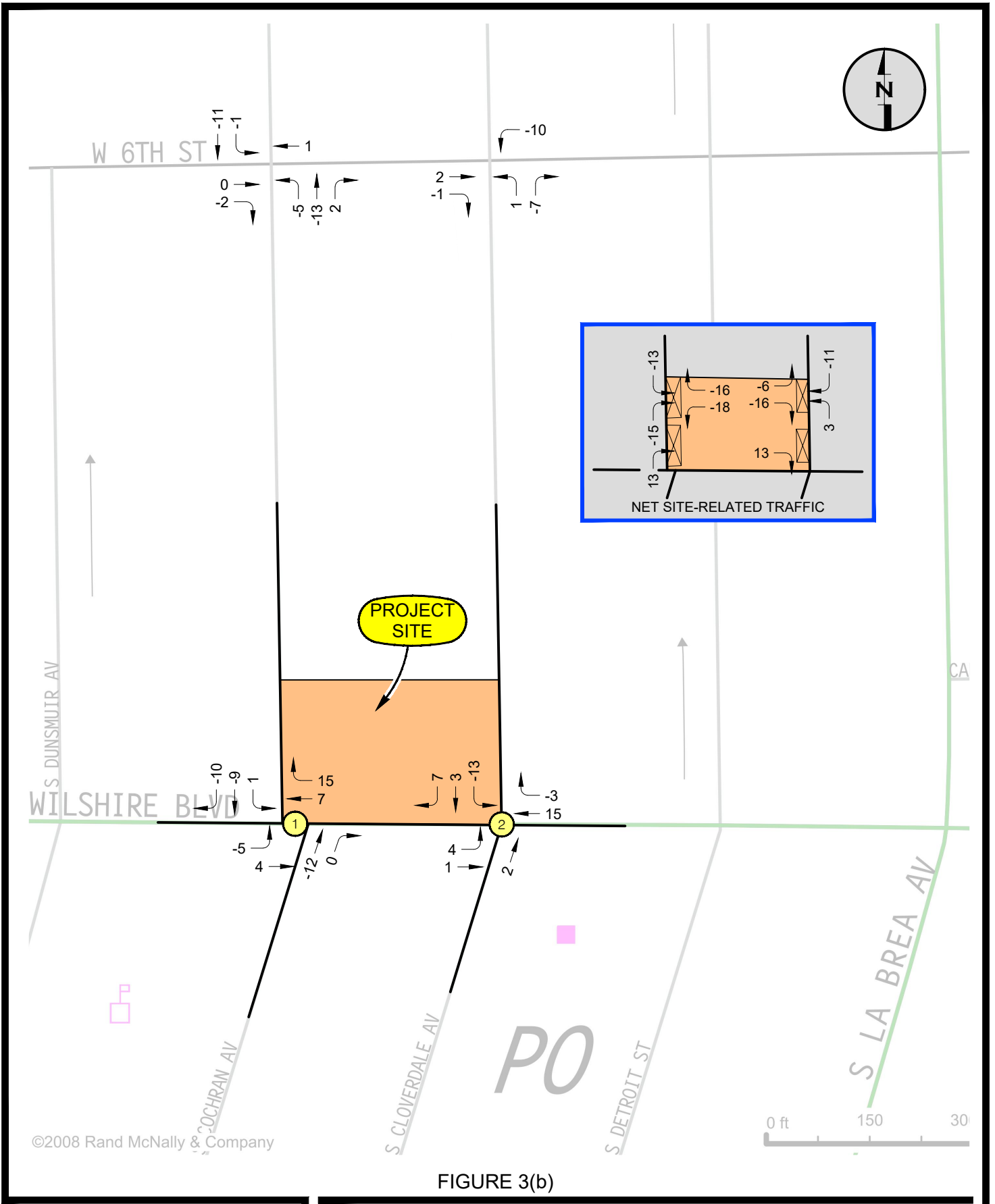


FIGURE 3(b)

688 S. COCHRAN AVENUE
PROJECT TRAFFIC VOLUMES
TOTAL NET "REVISED" PROJECT TRIPS
PM PEAK HOUR



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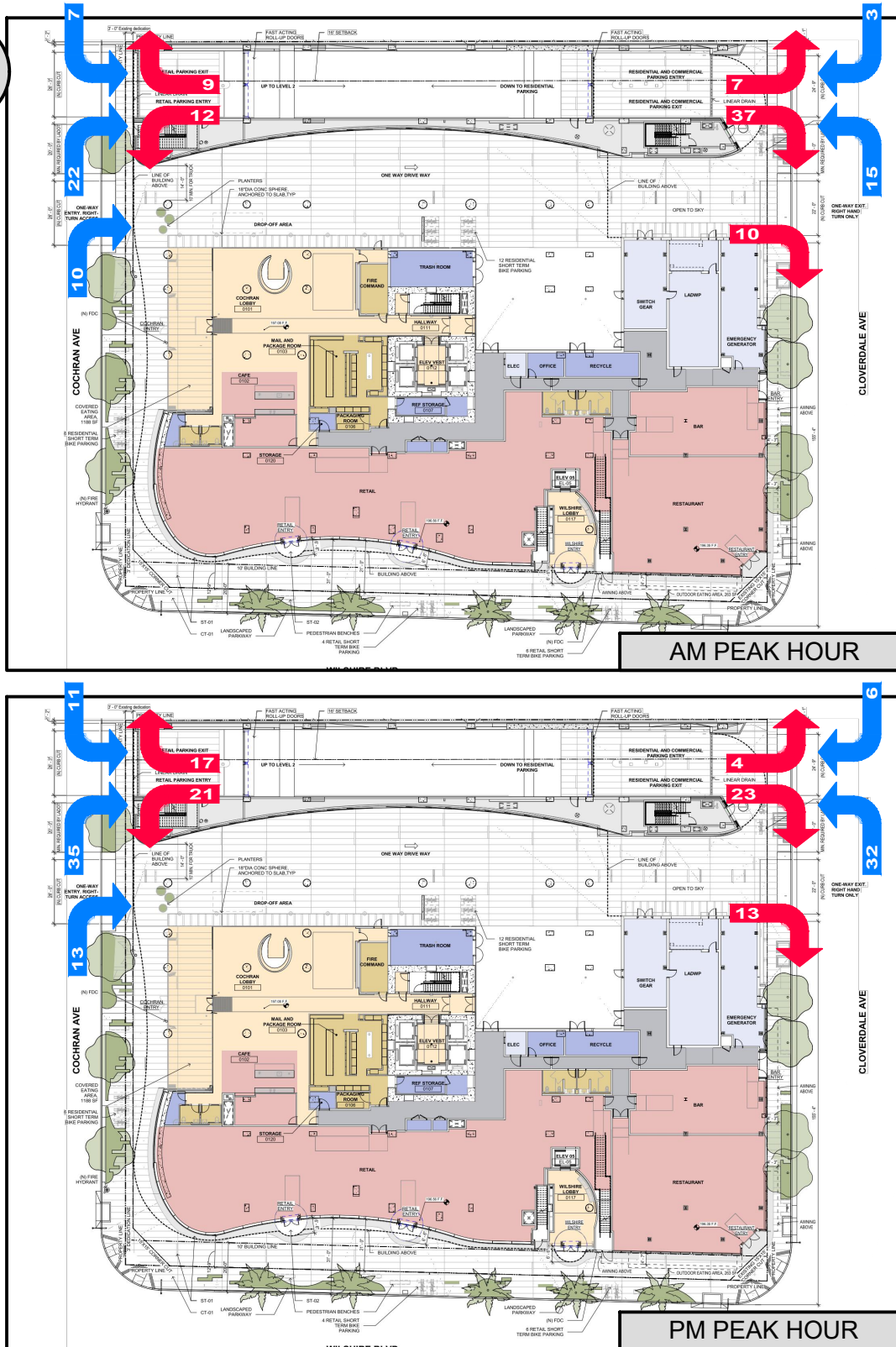
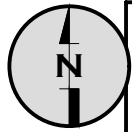


FIGURE 4

688 S. COCHRAN AVENUE
TOTAL "REVISED" PROJECT DRIVEWAY VOLUMES

Project Study Intersection Traffic Conditions Updates

As described earlier in this document, the primary purpose of these supplemental analyses is to update the “non-CEQA” traffic evaluations from the approved May 2022 TIA in order to address potential changes in the area traffic conditions due to modifications to the proposed project itself (as identified in the preceding sections of this document), as well as those associated with the new traffic generated by the two new related projects. The procedures used for these updates, along with the results of the updated analyses, are discussed in the following pages.

Existing Study Intersection Traffic Volumes

The existing (year 2021) traffic volumes at the study intersections used in the May 2022 TIA were based on traffic counts conducted in August of 2018. Although LADOT generally requires that all traffic data be as current as possible, due to the COVID-19 pandemic and its effects on traffic volumes and travel patterns, LADOT staff directed that these August 2018 traffic counts be used, without adjustment, to evaluate the existing (year 2021) area traffic conditions. Typically, updates to the traffic analyses would utilize current data, and LADOT has recently determined that the COVID-19 related effects on traffic conditions are no longer a factor. However, due to the current and on-going construction of the Metro “D” Line station at the northwest corner of the intersection of Wilshire Boulevard and La Brea Avenue, less than two blocks from the project site, including lane closures and other construction-related disruptions along both Wilshire Boulevard and La Brea Avenue, any new traffic data collected at the study intersections could be corrupted and not accurately reflect typical traffic volumes and/or travel patterns in the project vicinity.

Therefore, for the purposes of these updates, the “existing” year 2021 peak hour traffic volumes used in the May 2022 TIA were growth-factored to estimate the current year 2023 traffic volumes, based on the same 1.0 percent annual growth factor described in that study. Note that, since the 2018 traffic count data was assumed to reflect the year 2021 conditions, the traffic growth factor was applied to these volumes for a period of two years (growth-factoring 2021 to 2023 volumes). The resulting year 2023 AM and PM peak hour traffic volumes at the study intersections and existing project site driveways (including the updated existing site use trips) are shown in Figure 5.

Future (Year 2027) Study Intersection Traffic Volumes

The methodology used in this study to update the future traffic volumes at the study intersections is the same as described in the May 2022 TIA. First, the “baseline” future year (2027) volumes were estimated by applying the 1.0 percent “ambient traffic growth factor” identified previously. Next, although this growth factor is expected to fully address all potential area traffic increases, traffic generated by other nearby development projects (“related projects”) was also included in the estimates of the future year 2027 “Without Project” conditions. As with the May 2022 TIA, listings of specific projects located within the study area (an approximately one-half mile radius of the project site) were obtained from LADOT and the City of Los Angeles Planning Department.

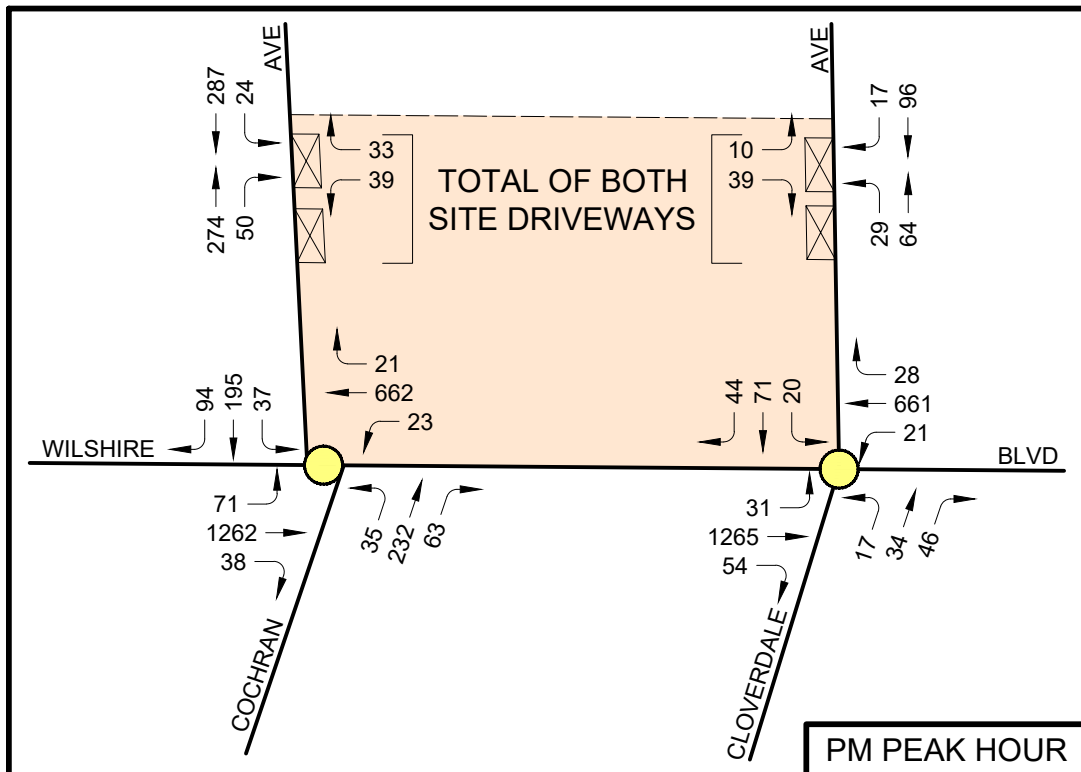
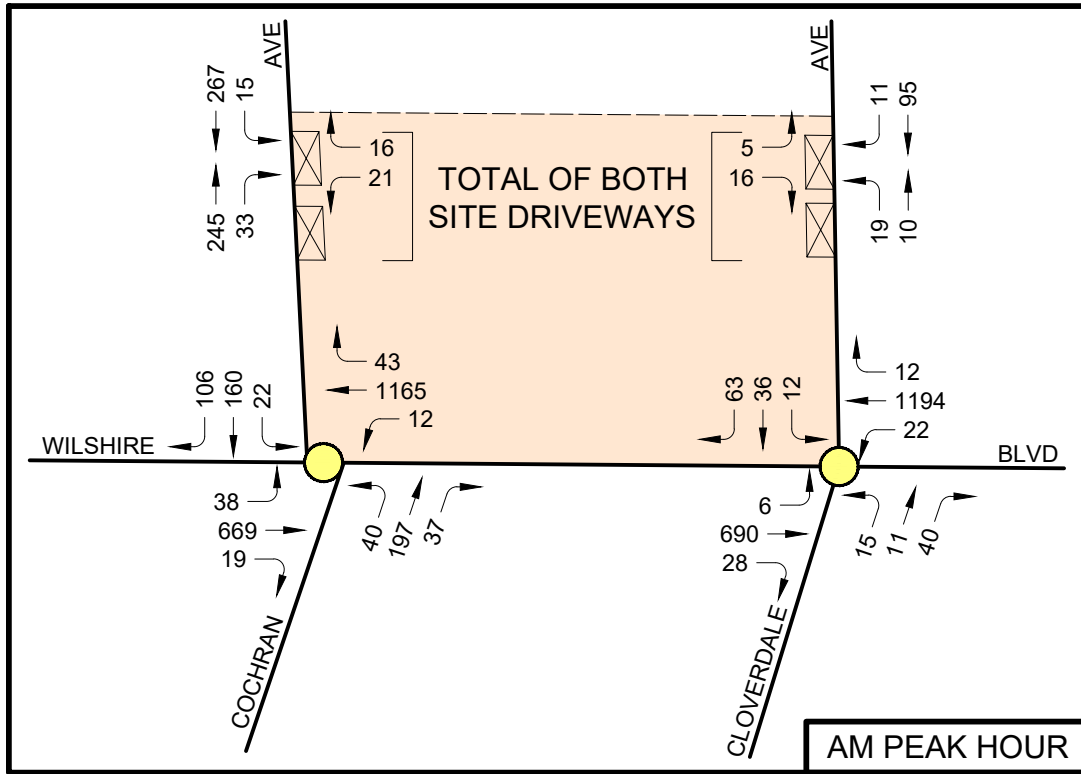


FIGURE 5

EXISTING (2023) TRAFFIC VOLUMES AM AND PM PEAK HOURS

* DUE TO COVID-19 PANDEMIC, COUNT DATA FROM AUGUST 2018 USED FOR 2021 VOLUMES;
GROWTH-FACTORED BY 1.0% PER YEAR TO 2023

As described earlier, a review of the current LADOT and Planning Department files indicated that, in addition to the 15 related projects identified in the May 2022 TIA, two new projects have been proposed for development within the study area subsequent to the preparation of that study. Further, these two new projects are located in close proximity to the subject Mirabel project site, and could be expected to directly affect the operations of the two study intersections. Therefore, the potential effects of the new traffic generated by those projects are included in these updates. The locations of each of these projects relative to the proposed project are identified in Figure 6 (with the two new projects highlighted), while the descriptions and trip generation estimates for each of the now 17 related projects are provided in Table D-1 in Attachment D of this document. The related projects trips shown in Table D-1 were then assigned to the study area roadways using the same assumptions and methodologies as described in the May 2022 TIA. The results of this procedure are shown for both the AM and PM peak hours in Figure D-1 in Attachment D.

The updated “Future (2027) Without Project” traffic volumes used in this study were developed by adding the combined effects of the assumed 1.0 percent annual ambient traffic growth factor and the potential trips generated by the related projects to the “Existing (2023)” traffic volumes. The resulting AM and PM peak hour traffic estimates, which represent the traffic volumes at the study intersections prior to the development of the proposed project, are shown in Figure 7.

Finally, the updated total net project-related trips shown in Figures 3(a) and 3(b), were added to the future (year 2027) “Without Project” AM and PM peak hour traffic volumes shown in Figure 7 to estimate the “Future (2027) With Project” volumes. The resulting “Future With Project” traffic at the two study intersections is shown for both the AM and PM peak hour conditions in Figure 8. The updated future “without” and “with project” intersection traffic volumes identified in Figure 7 and Figure 8, respectively, were used to evaluate the potential incremental traffic-related effects of the proposed (“revised”) project on the study intersections, as discussed in the following pages.

“Non-CEQA” Local Access and Circulation Analysis Updates

The same analysis procedures and assumptions described in detail in the project’s May 2022 TIA were then used to identify the vehicular delay values and corresponding level of service (“LOS”) at the study intersections (Wilshire Boulevard and Cochran Avenue, and Wilshire Boulevard and Cloverdale Avenue) for both the AM and PM peak hour. These analyses include an evaluation of the existing (year 2023) traffic conditions shown earlier in Figure 5, which is used to establish a “baseline” for assessing the effects of future traffic growth (unrelated to the proposed project), including both ambient growth and traffic from related projects, on each of the study intersections, as well as the forecast future (year 2027) “Without Project” and “With Project” traffic conditions identified in Figures 7 and 8, respectively. The comparison of the future “Without Project” and “With Project” traffic conditions was then used to identify the potential incremental traffic effects of the proposed project on the study intersections. The results of the analyses for the “Existing”, “Future Without Project”, and “Future With Project” conditions are summarized in Table 2.

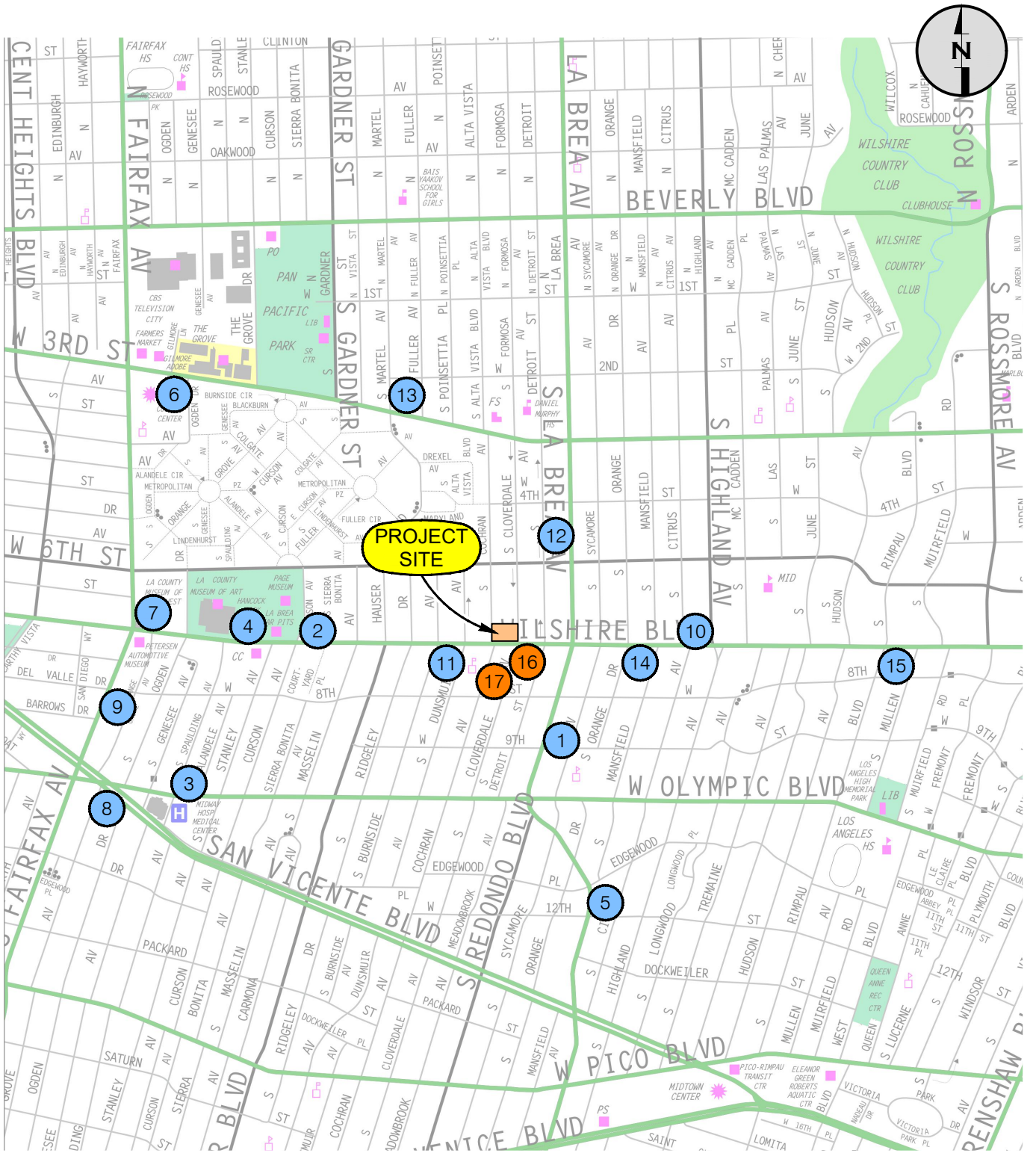


FIGURE 6

688 S. COCHRAN AVENUE
 UPDATED RELATED PROJECTS LOCATION MAP
 (ADDITION OF PROJECTS #16 AND #17)



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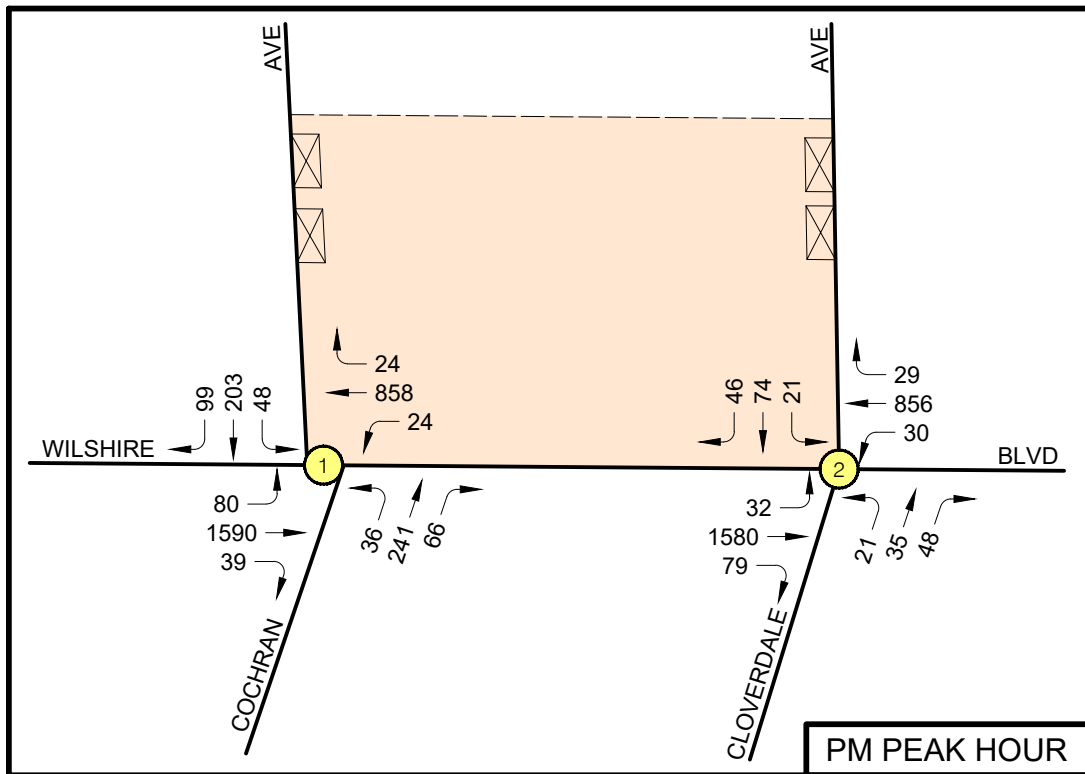
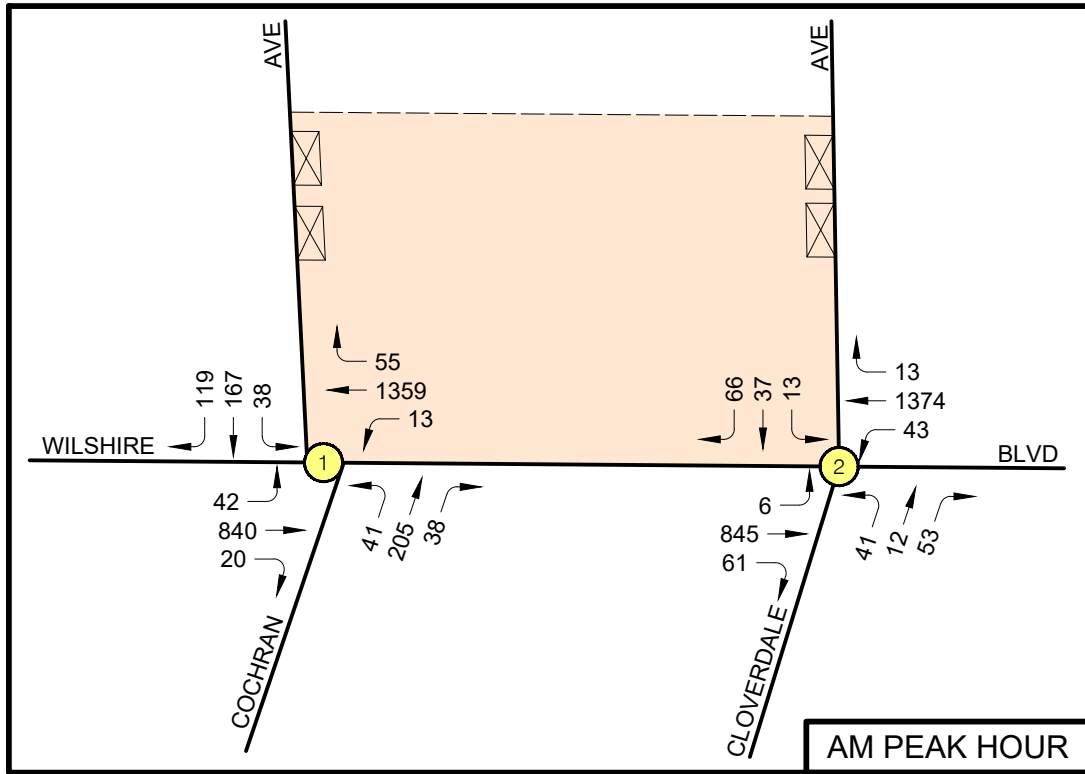


FIGURE 7

FUTURE (2027) TRAFFIC VOLUMES
WITHOUT PROJECT
AM AND PM PEAK HOURS



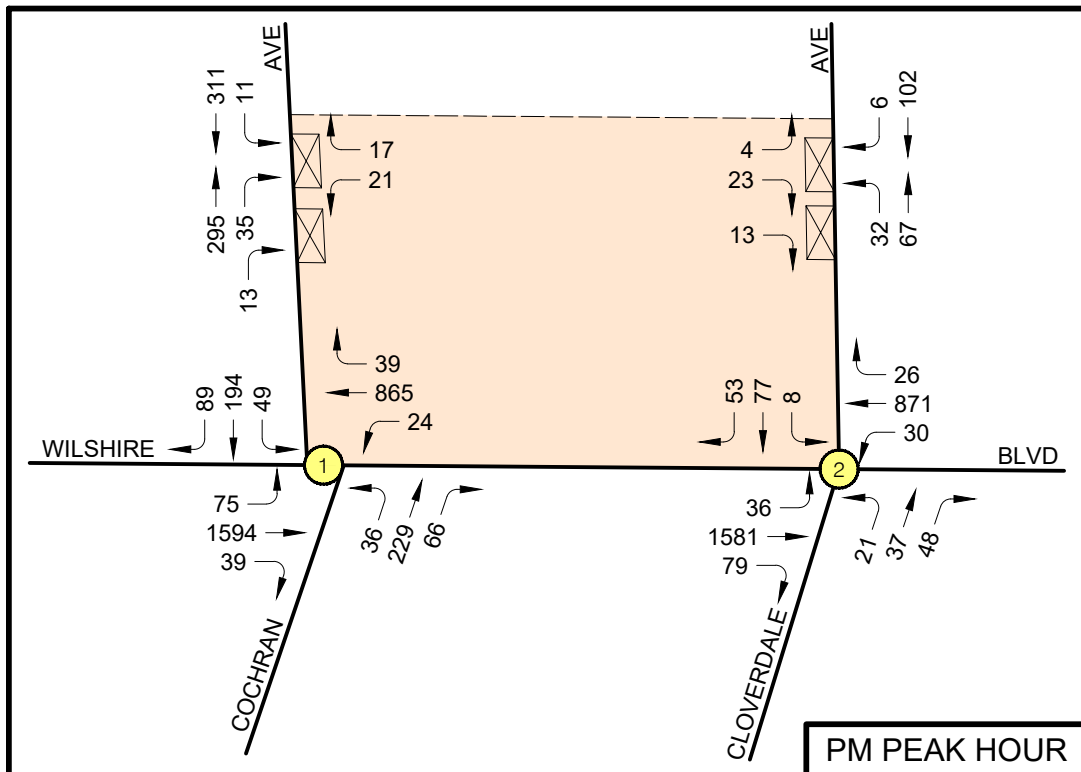
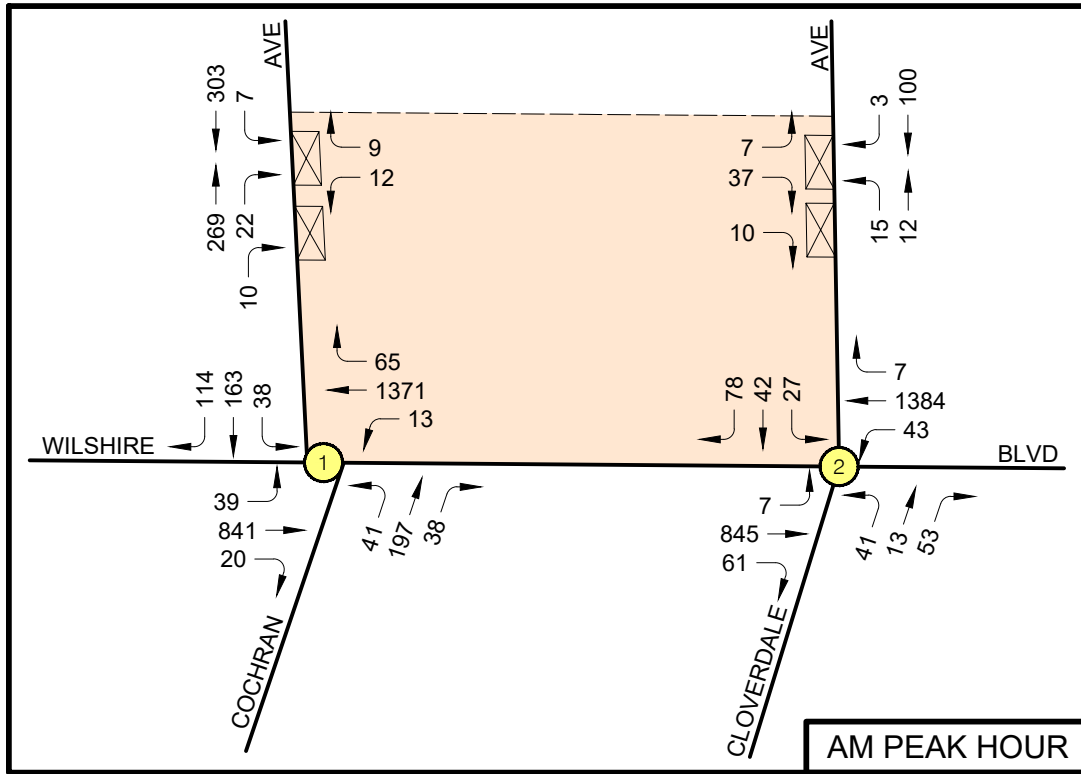


FIGURE 8

FUTURE (2027) TRAFFIC VOLUMES
WITH "REVISED" PROJECT
AM AND PM PEAK HOURS



Table 2
Highway Capacity Manual ("HCM") Delay-Based" Intersection Operations Analysis
Existing (2023) and Updated Future (2027) Peak Hour Conditions

Int. No.	Intersection	Peak Hour	Existing (2023)		Future (2027)				
			Delay *	LOS	Without Project		With Project		
					Delay *	LOS	Delay *	LOS	Change
1	Wilshire Boulevard and Cochran Avenue	AM	29.3	C	33.1	C	31.9	C	-1.2
		PM	35.4	D	43.6	D	39.9	D	-3.7
	May 2022 TIA Results (Existing Year 2021)	AM	28.6	C	31.9	C	30.7	C	-1.2
		PM	34.3	C	41.8	D	38.5	D	-3.3
2	Wilshire Boulevard and Cloverdale Avenue	AM	9.7	A	11.6	B	13.1	B	1.5
		PM	11.9	B	12.7	B	12.6	B	-0.1
	May 2022 TIA Results (Existing Year 2021)	AM	9.6	A	9.9	A	12.3	B	2.4
		PM	11.8	B	12.6	B	13.0	B	0.4

Note:

*** Total Intersection approach delay in seconds per vehicle.

As shown in Table 5, which also identifies the analysis results from the project's May 2022 TIA, the study intersections will continue to exhibit "acceptable" levels of service (LOS D or better) during both the AM and PM peak hours under the updated "Existing (year 2023)" conditions, although the operations at the intersection of Wilshire Boulevard and Cochran Avenue could be expected to deteriorate slightly from high LOS C (for the previous "year 2021" existing levels) to low LOS D conditions during the PM peak hour (but remain at LOS C during the AM peak hour), while the intersection of Wilshire Boulevard and Cloverdale Avenue will continue to exhibit LOS A and LOS B conditions similar to the May 2022 TIA during the AM and PM peak hours, respectively.

Similarly, although the anticipated future increases in traffic within the study area resulting from both general ambient traffic growth and the traffic generated by the 17 related projects identified in Attachment D could slightly deteriorate the traffic conditions at both study intersections by the year 2027 (prior to development of the proposed project), as also shown in Table 2, the operations at both locations would be generally unchanged from their "existing year" levels of service, with the exception of the intersection of Wilshire Boulevard and Cloverdale Avenue, which is forecast to experience a slight decrease, from high LOS A to low LOS B conditions, during the AM peak hour. However, Table 2 also identifies that the updated "Future (2027) Without Project" delay values and associated levels of service at both of the study intersections (which include the effects of the traffic generated by the new related projects) are similar to those identified in the May 2022 TIA, with both locations expected to continue to exhibit good operating conditions (LOS A or LOS B) during both the AM and PM peak hours even with the potential new related projects' traffic.

The potential traffic generated by the proposed (“revised”) project itself is also expected to affect the future operations of the study intersections, although as again shown in Table 2, the project is anticipated to result in only nominal incremental changes in the forecast future delay values at the study intersections. In fact, as identified in Table A-1(a), the proposed project is estimated to result in an overall reduction in site-related traffic compared to the existing site uses, and as such, could slightly improve the overall approach delays at the intersection of Wilshire Boulevard and Cochran Avenue during both peak hours, as well as at the intersection of Wilshire Boulevard and Cloverdale Avenue during the PM peak hour. Additionally, the “revised” project is not anticipated to change the forecast “Future (2027) Without Project” levels of service at either study intersection during the AM or PM peak hours. Further, a review of the left-turn vehicular queue lengths on the Wilshire Boulevard approaches of both study intersections shows that the future traffic demands can be accommodated by the existing left-turn lane lengths, and no left-turn vehicle queuing into the “through” lanes in either direction on Wilshire Boulevard at the subject locations is expected.

Finally, the “revised” project will not result in “gridlock” conditions, as the “through” traffic queues on Wilshire Boulevard are not expected to extend from either of the study intersections into any of the adjacent intersections, and therefore, would not inhibit traffic progression in either direction along Wilshire Boulevard, or impede the flow of traffic across Wilshire Boulevard from any of the study area side streets. Finally, the updated evaluations indicate that no long-term blockages of the proposed project’s primary or porte cochere driveways due to vehicular queuing northward from Wilshire Boulevard along either Cochran Avenue or Cloverdale Avenue are expected.

Therefore, based on these updated analyses, the “revised” project is not anticipated to result in detrimental or undesirable effects at the study intersections, and no project-related improvements to address transportation-related deficiencies in the area transportation network are warranted.

Project Driveway Operations Evaluation Updates

No issues with the project’s proposed driveway locations or site access scheme are anticipated, and as discussed in the preceding section, the “revised” project’s net traffic will not result in any undesirable effects to the study intersections. However, as required by the TAG, the operations of the driveways themselves were examined to assure that adequate entry and exit capacities are provided to accommodate the project’s peak vehicular demands of the project. The results of these analyses confirm that both of the “primary” driveways will operate at acceptable levels, with the project’s Cochran Avenue “commercial” driveway exhibiting LOS B conditions during both the AM and PM peak hours, while its Cloverdale Avenue “residential” driveway will operate at LOS A during both peak hours. Further, no substantial access-related delays, or on-site or on-street vehicular queuing at either of these driveways is anticipated under typical conditions. Therefore, both of the proposed project’s “primary” access driveways are expected to operate at acceptable levels, with no long-duration “internal” or on-street vehicular queuing, or disruption of pedestrian activity or vehicular traffic flows along either Cochran Avenue or Cloverdale Avenue.

Local/Residential Street Cut-Through Traffic Evaluations

These updates also evaluated the “revised” project’s potential effects on both Cochran Avenue and Cloverdale Avenue, since each of these facilities provide access to the project’s driveways, and will be directly affected by its traffic. As described in detail in the May 2022 TIA, these effects are based on the project’s incremental daily (24-hour) traffic additions to the subject roadways. Therefore, using the same trip assignment assumptions and methodologies as the May 2022 TIA, the net daily project-related traffic volumes expected to use each of these streets was identified, and the results are shown in Figure 9. As with the May 2022 TIA, these evaluations used only the project’s “primary” residential and commercial component trips, since its “ride service” trips (described earlier) will enter and exit the project site within the commercially-zoned segments of the streets, and will not travel through the “residential” portions of either of the subject streets.

The updated local/residential cut-through traffic analyses indicate that the “revised” project itself is anticipated to add a total of about 299 new daily “commercial” trips to Cochran Avenue and a total of about 162 new daily “residential” trips to Cloverdale Avenue. However, the demolition (or rehabilitation) of the existing site uses to construct the proposed project will also result in the associated removal of about 618 trips per day on Cochran Avenue, and about 287 trips per day on Cloverdale Avenue. Therefore, as also identified in Figure 9, similar to the “original” project evaluated in the May 2022 TIA, the proposed (“revised”) project would reduce the traffic levels along Cochran Avenue to the north of the project site by about 319 trips per day, and similarly, would reduce the overall traffic along Cloverdale Avenue (again, to the north of the project site) by about 125 trips per day. As a result, the “revised” project would not result in any adverse or undesirable effects on Cochran Avenue or Cloverdale Avenue, and no further analysis is required.

Other “Non-CEQA” Analysis Update Considerations

Finally, the May 2022 TIA included detailed evaluations of the “original” project’s potential effects on pedestrian, bicycle, and public transit facilities and access in the immediate project vicinity. While the modifications to the “original” project (which result in the “revised” project analyzed in these updates) involved the proposed conversion of nine “moderate-income” residential units to typical “market-rate” units, the total number of residential units remains the same as evaluated in the May 2022 TIA (although according to the updated VMT Calculator evaluations contained in the August 9, 2023 VMT/trip generation technical letter, the total number of project residents could decrease slightly, from 818 residents to 810 residents). Additionally, the “revised” project’s proposed commercial component uses and sizes would be unchanged from the May 2022 TIA. Further, the modifications to the project would not change any of the construction-related timelines or activity levels from those analyzed in the May 2022 TIA, which itself concluded that the project would not cause undesirable effects on pedestrian, bicycle, or public transit access or operations, and as such, the evaluations of those items provided in that study remain valid for this update, and no further analyses of any of these items related to the “revised” project are necessary.

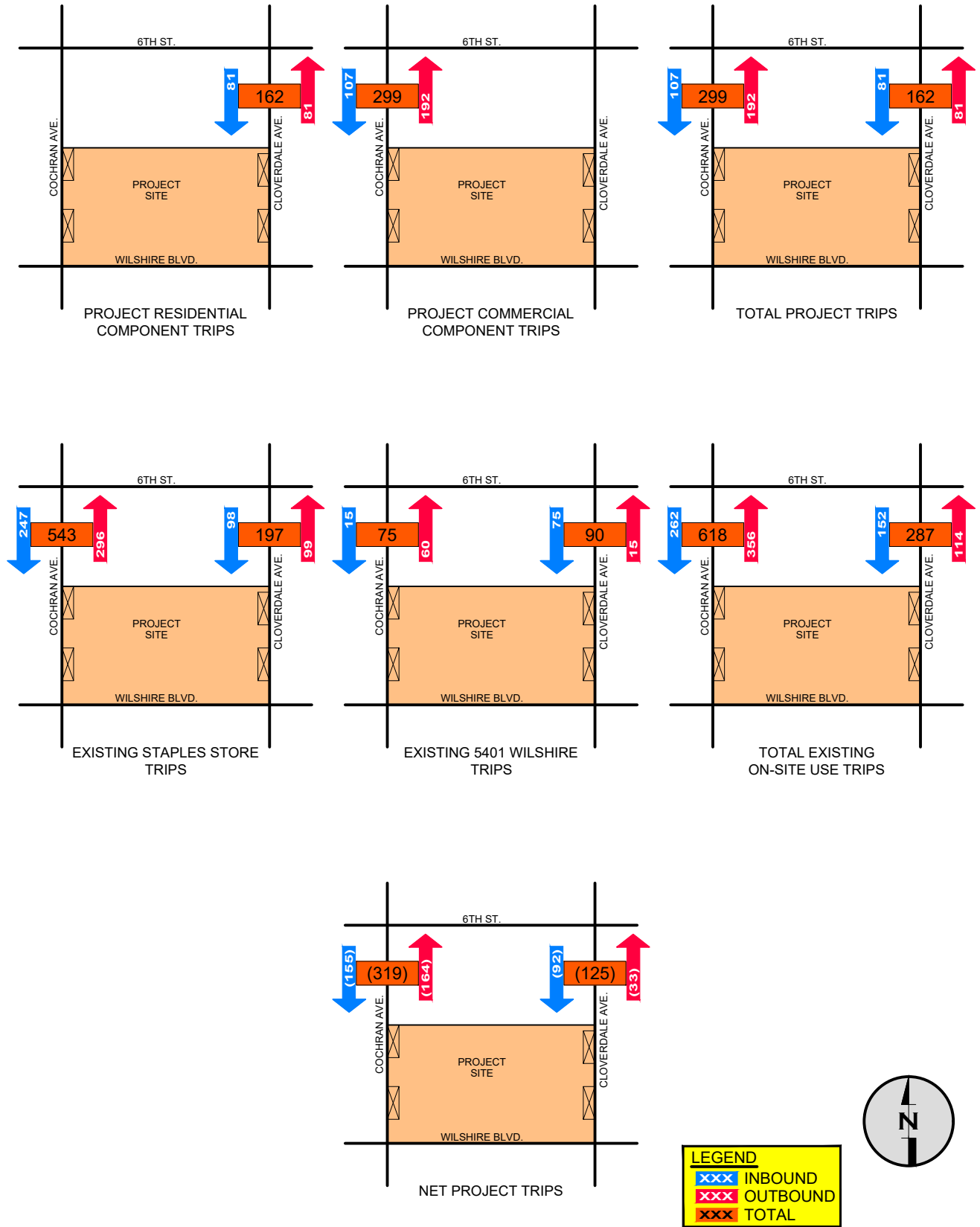


FIGURE 9

688 S. COCHRAN AVENUE
DAILY (24-HOUR) "REVISED" PROJECT-RELATED TRAFFIC
ON LOCAL/RESIDENTIAL STREETS

Summary, Conclusions, and Recommendations

Based on the results of the evaluations summarized in the preceding pages of this document, neither the proposed modifications to the residential component of the subject Mirabel project (including the trip generation updates using the current version of ITE's *Trip Generation* manual), nor the inclusion of the additional traffic associated with the two recently-identified related projects, would change any of the conclusions identified in the "original" project's approved May 2022 TIA. Therefore, as with the "original" project, these updates show that the "revised" project would not result in any undesirable traffic-related effects, and no further analyses are warranted.

Please review the preceding and attached information, and let us know if you have any questions.

Sincerely,



Ron Hirsch, P.E.
Principal

Attachments