



July 11, 2008

Mr. William D. Kopper
Attorney at Law
417 E Street
Davis, CA 95616

Subject: Final EIR For The Metropolitan Project

P06006

Dear Mr. Kopper:

Per your request, I have reviewed the transportation and circulation component of the final environmental impact report (hereinafter "the FEIR") for the Metropolitan Project (the "Project") in the City of Sacramento (hereinafter "the City") dated May, 2008 (State Clearinghouse Number: 2006042161). I have previously commented on several prior editions of environmental documentation for the subject project including a letter of comment dated 4-14-08 in response to the Recirculated Draft Environmental Impact Report (RDEIR) on the Project that was circulated on 2-29-08. My qualifications to perform this review are thoroughly documented in those prior submissions.

Failure to Update the Traffic Analysis to Account for Known Large Projects in the Area and Inadequate Response to Comment M-9

Our comment on the RDEIR, now labeled M-9 in the FEIR response, concerned the fact that the two largest proposed development projects (the Township 9 and Railyards projects) impacting downtown Sacramento traffic in the area also impacted by the subject Project were known to the City at the time of preparation of the RDEIR traffic analysis and yet were not taken into account in the Project's traffic analysis. In response M-9, the City states that the traffic impacts of the Metropolitan Project were taken into account in the EIRs for Township 9 and Railyards and that, where impacts were disclosed at locations studied in common with Metropolitan, those other projects identified mitigation measures.

This response is inadequate in several ways:

- First, it is the obligation of the City to disclose the Metropolitan Project's traffic impacts and needed mitigations to the public and public policymakers in this EIR, not scattered in EIRs on other projects.

- Second, as will be demonstrated in a subsequent section herein, the traffic caused by the Project's Mixed-Use Hotel Option has never been properly analyzed and would be considerably greater in the P.M. peak hour than that of the original Residential Option for the Project. Since the traffic for the Mixed-Use Hotel Option has never been properly defined, it could not have been taken into account in the EIRs for Township 9 and Railyards.
- Contrary to Response to Comment M-9, locations of potential importance in this matter are not limited to locations that were analyzed 'in common' for Metropolitan and for Township 9 or for Railyards.

As pointed out in our comment of 4-14-08, for the FEIR to be adequate, the City needs to revise the Project's traffic analysis to take into account the Township 9 and Railyards projects which were clearly projects of relevance at the time the traffic analysis for the Mixed-Use Hotel Option that should have been in the RDEIR would have been prepared.

The RDEIR and the FEIR Have Not Properly Analyzed The Traffic Generation and Traffic Impacts of the Mixed-Use Hotel Option. The Mixed-Use Hotel Option's Traffic and Potential Traffic Impacts Would Be Significantly Greater Than Estimated. The FEIR Response M-11 Misrepresents What Portions of the Mixed-Use Hotel Option Have Been Considered in the Analysis

The RDEIR traffic analysis of the Mixed-Use Hotel Option is comprised solely on a trip generation assessment that purportedly compares the traffic generation of the Mixed-Use Hotel Option to that of the original Residential Option and concludes that because, in its flawed analysis, that the traffic generation of the Mixed-Use Hotel Option is less than that of the original Residential Option, then the impacts identified for the Residential Option constitute the maximum possible traffic impacts of the Project and therefore no further traffic analysis of the Mixed-Use Hotel Option is needed. However, this conclusion based on the comparative traffic generation analysis is flawed because that comparative analysis only considered the portions of the Mixed-Use Hotel Option associated with the remaining condominium residential units and the transient hotel room occupancy. The analysis fails to account for the traffic associated with the major restaurant and function room space within the hotel.

The proposed Mixed-Use Hotel Option includes an 11,000 square foot restaurant with 7000 square feet of dining space and a 4000 foot kitchen that appears scaled to also service the 23,300 square foot hotel function rooms. FEIR response M-11 states that "the traffic study prepared specifically for the Mixed-Use Hotel Option included an analysis of the anticipated traffic generated by the

restaurant” and states that the analysis was done using rates for restaurants from the ITE publication *Trip Generation*. This statement is utterly false. The trip generation analysis for the Mixed-Use Hotel Option is presented in the first 3 pages of Appendix B to the RDEIR (pages 91 to 93 of the pdf of the RDEIR document) and is comprised of a 17 September '07 memorandum from Pelle Clarke and Vic Maslanka of DKS Associates to Jesse Gothan, a true and correct copy of which is attached hereto as Exhibit A. This memorandum estimates the trip generation of the Mixed-Use Hotel Option solely on the basis of it containing 190 hotel rooms and 190 condominium units; there is absolutely no consideration of the restaurant component whatsoever.

Had the RDEIR analysis actually evaluated the restaurant component of the Mixed-Use Hotel Option using ITE trip generation rates for restaurants (as is incorrectly claimed in Response-to-Comment M-11), the analysis would have found that the restaurant component would generate 83 trips in the pm peak period (7.49 trips per 1000 square feet x 11,000 square feet of restaurant use = 83 pm peak trips). When this total is added to the 155 pm peak trips estimated for the hotel rooms and condominium units in the above-referenced RDEIR Appendix B trip generation analysis memo, the net pm peak trip generation for the Mixed-Use Hotel Option is revealed as 238 trips. This is 15 percent more trips than the total estimated for the original residential development project (208 pm peak trips). The RDEIR traffic analysis presumes that the traffic impacts of the Mixed-Use Hotel Option would be no greater than that disclosed for the Residential Option (based on the presumption that the Mixed-Use Hotel Option's trip generation would be less), so it did no actual traffic analysis of the Mixed-Use Hotel Option. However, the presumption that the Mixed-Use Hotel Option's trip generation would be less is demonstrably wrong. The FEIR is inadequate without a traffic analysis of the Mixed-Use Hotel Option.

Furthermore, our analysis above showing that the trip generation of the Mixed-Use Hotel Option is 15 percent greater than the Residential Option likely understates the extent to which the trip generation potential of the Mixed-Use Hotel Option exceeds that of the Residential Option. This is because of the potential for use of the 23,300 square feet of hotel “function rooms” as banquet facilities. The 4000 square foot kitchen in the 11,000 square foot restaurant is clearly scaled to service such banquet use of the hotel function rooms. If trip generation for evening use of the hotel function room space as banquet facilities is estimated at the ITE trip generation rates for restaurants, this would add another 175 trips to the pm peak totals for the Mixed-Use Hotel Option (7.49 trips per 1000 square feet x 23,300 square feet of function room space = 175 trips). This would bring the total pm peak trip generation of the Mixed-Use Hotel Option to 413 trips, 99 percent higher than that of the Residential Option. To comply with the good faith effort to disclose impact required by CEQA, the FEIR must include a traffic impact analysis based on the full reasonably likely trip generation

of the hotel's restaurant and function rooms. The current analysis, which does not consider the trip generation of these facilities, falls short of that good faith effort.

The FEIR has evaded and utterly failed to address these cogent issues.

Response to Comment M-11 Is Inadequate. The FEIR Fails To Evaluate Potentially Significant Effects of Mixed-Use Hotel Option's Porte Cochere Facility on Traffic Near the Project Site

Part of our 4-14-08 comment on the RDEIR that is now labeled Comment M-11 explained in detail how inadequacies in the pedestrian pick-up/drop-off, parking, parking access, and goods loading/unloading areas of the Mixed-Use Hotel Option's porte cochere facility and the close spacing of its intersection with 10th Street with that of the alley that forms the north boundary of the Project could have potentially significant operational and safety impacts on traffic approaching, departing and driving past the project site on 10th Street. The comment also pointed out that none of these features of the porte cochere were adequately analyzed in the RDEIR because the only traffic analysis of the Mixed-Use Hotel Option it contained was the flawed and incomplete (as described in the preceding section) trip generation comparison to the Residential Option.

The FEIR response is to repeat by reference the RDEIR's errant conclusion that the trip generation of the Mixed-Use Hotel Option is less than that of the Residential Option, and its consequently errant conclusion that maximum traffic impact of the Mixed-Use Hotel Option is described by the traffic impact analysis of the Residential Option. There still is no adequate traffic analysis of the Mixed-Use Hotel Option's porte cochere facility capacity in relation to demand and its consequent impacts on traffic on 10th Street. The FEIR Response M-11 also incorporates Response to Comment M-3 which physically describes the porte cochere or 'motor court' facility (three lanes – one for passenger drop-off, one for short term parking related to hotel registration and departure and one for direct access to parking) and observes that the City's Development Engineering and Financing Department 'reviewed and approved the proposed site plan'. The information in Response M-3 is non-responsive and irrelevant to the issue since Response M-3 only physically describes the porte cochere facility but does not quantitatively evaluate its functional capacity in relation to peak demand for passenger drop-off, parking access and short-term parking for registration/departure. The so-called review by the City's Development Engineering and Financing Department is meaningless since there was no quantitative analysis of the porte cochere facility's capacity in relation to demands available to be reviewed.

Because the response(s) never address the fundamental issues that the functional capacity of the porte cochere facility has never been quantitatively evaluated in relation to demand and that inadequacies in the porte cochere combined with close spacing of the porte cochere to the intersection of the north boundary alley with 10th Street can cause traffic operations and safety impacts, we restate the compelling reasons why the FEIR is inadequate without such a quantitative analysis.

- The 7000 square feet of dining area in the restaurant and the 23,300 square feet of function rooms could be used in banquet mode. In banquet use, all the attendees tend to arrive and depart at about the same time (as contrast with small groups of diners arriving independently at staggered intervals in ordinary dining mode). Restaurant design guides considered authoritative¹ indicate that seating densities in the seating areas for quality restaurants and gourmet restaurants range between 16 and 20 square feet per seat. Using the lower density value of 20 square feet per seat, this suggests that the restaurant seating space could seat 350 people and the function rooms could seat over 1150 persons in banquet mode. So when the restaurant and function rooms are used for banquet events, over 1500 people could arrive or depart almost simultaneously.

Even if only 50 percent of these people came by car and traveled at the unusually high occupancy rate of three persons per car, some 250 cars could arrive at the porte-cochere facility almost simultaneously. If a more likely 67 percent came by car at an occupancy rate of 2 persons per vehicle, in excess of 500 cars could attempt to arrive at the hotel almost simultaneously.

The Project site plan shows that the porte cochere facility has about 72 feet of curb space (equivalent to about 3.5 curb parking spaces) for short-term parking intended for hotel check-in and about 110 feet of curb passenger loading zone (equivalent to about 5.5 curb parking spaces). Even if the normal short-term check-in parking area is used in support of the banqueting traffic, it is evident that when there is a major banquet event, or events, these facilities will be overwhelmed and traffic will back up into 10th Street causing traffic impacts there.

- The City's staff report prepared for the 5-22-08 Planning Commission hearing on the Project reveals that only 177 parking spaces in the Project's garage may be available for persons using the restaurant and function rooms (41 spaces calculated by staff as supporting the restaurant

¹ See Gone, C., *Welcome to: Starting a Restaurant from Scratch, A step-by-step Guide*, and Lawson, Fred R., *Restaurants Clubs & Bars, Planning, Design & Investment*.

and function rooms and 136 purported 'extra' spaces) and that over 60 percent of the spaces in the garage are tandem spaces, meaning that access to the garage will have to be by valet parking rather than self-parking. This has several significant implications.

- 1) If between 250 and 500 drivers arrive for banquet events expecting to park at the hotel, as could reasonably be the case, drivers not in the lucky 177 to be admitted to the hotel garage will be backing up into the street from the porte cochere or milling about at the porte cochere entrance before attempting to find parking elsewhere. This would cause traffic impacts on 10th Street.
 - 2) Because valet parking is necessitated by the preponderance of tandem parking in the garage, the express lane to the garage through the porte cochere will not function as an express lane; it will function as a valet transfer lane. Because of the time involved in valet transfers, this lane will also back-up into 10th Street during the start of major banquet events, also causing traffic impacts there.
 - 3) The fact that neither the FEIR nor the RDEIR parking analysis ever reported that tandem parking was involved and that this would necessitate use of valet parking for restaurant and function room banquet events makes the FEIR deficient as an information document.
- The porte-cochere facility in the site plan for the Mixed-Use Hotel Option intersects 10th Street only about 14 feet from the design limits of the existing alley that runs between 10th and 11th Streets along the project's north side. The porte cochere lanes would be used for access to short term parking by hotel guests checking-in, ingress to a portion of the garage area by hotel guests and people using the restaurant and function rooms and for access to the drop-off area serving the hotel, restaurant and function rooms. The alley would be used in both directions for access and egress to/from the garage serving the Residential portion of the project, access and egress to/from other buildings, access and egress from the Project's loading docks as well as for egress from the hotel-restaurant-function room portion of the garage, for egress from the porte cochere drop-off area and for egress by those who come into the porte cochere hoping to park but are turned away. The close spacing, the sight distance limitations, the complex traffic patterns at the compound intersection of 10th Street with the alley and the porte cochere and the added complexity of the queuing back into it from the porte cochere that would occur at times of major banquet events make this intersection an obvious point for traffic operational impacts and traffic safety problems. No quantitative

analysis of this critical location has ever been performed in the FEIR or DEIR.

Response-to-Comment M-12 Is Inadequate. The FEIR Fails To Evaluate Potentially Significant Effects of Mixed-Use Hotel Option on Parking at the Project Site

The previous section included considerations of parking adequacy in the sense of being contributory to traffic impacts at and near the Project site. This section considers adequacy of project parking in the sense of direct parking impacts. Our comment now labeled M-12 in the FEIR expressed concern that, mainly due to lack of consideration of the parking generation of restaurant and function-room facilities, the Mixed-Use Hotel Option would have parking impacts that have not been disclosed. The FEIR response simply states that the parking provision of 475 spaces meets the City code requirements for parking provision of 1.5 spaces per residential unit and 1 space for hotel room (190 residential units @ 1.5 per unit + 190 hotel rooms at 1 per room = 475 spaces). In fact, this response cites the wrong criterion from City Parking Code (Code Section 16.64.020) applicable to the hotel room and residential condominium units and fails to reflect required parking provisions for the restaurant and hotel function rooms. Therefore, the FEIR response is inadequate.

The staff report for the May 22, 2009 City Planning Commission hearing on the project correctly points out that the provisions of City Parking Code applicable to the proposed Project uses on a downtown Sacramento site are 1 space per unit plus 1 visitor space per 15 units for the condominium units, 1 space per 2 guest rooms for the hotel rooms plus an additional allocation of parking for additional hotel services space (such as restaurants or conference center 'function-rooms'). Under this application of the right portion of the Parking Code, the Mixed-Use Hotel Option would require 203 parking spaces for the condominium units and 95 spaces for the hotel guest rooms. However, the staff report assumes the Mixed Use Hotel Option involves 'additional service space' of 20,500 square feet and assumes, without foundation or support from parking code, that this space would require parking at a rate of 1 space per 500 square feet (giving a total of 41 additional parking spaces required to support the additional services area). This portion of the staff report analysis is wrong relative to the amount of 'additional service' space and relative to the applicable parking rate. Since the project description indicates the restaurant includes 7000 square feet of seating area (not including the 4000 square foot kitchen) and that the "function rooms" are sized at 23,300 square feet, it is obvious that the 'additional services' space for which parking needs to be provided is 30,300 square feet, not the 20,500 square feet that was estimated in the staff report. Moreover, there is no substantiation for the rate of 1 space per 500 square feet that the staff report applies to make parking provision for the 'additional services' area; it does not relate to any

specification in City Parking Code or have any other justification. Staff appears to have picked this rate out of thin air.

In point of fact, there is a rate in City Parking Code that the staff report analysis could and should have used. This is the rate for restaurants of 1 parking space per 3 seats. Clearly this is applicable to the restaurant space in the project and, since, use of the 'function rooms' as banquet facilities would be commonplace and would clearly be the use most critical to traffic and parking impacts from the perspective of intensity and timing, the City Parking Code restaurant rate of 1 space per 3 seats should be applied to the function room area as well. Using the restaurant design criterion of 1 seat per 20 square feet cited in the previous section, the 7000 square foot restaurant dining area could seat 350; the 23,300 square foot function rooms used as banquet facilities could seat 1165 for a combined total of 1515 seats. At 1 parking space per 3 seats, the parking requirement for the additional services area would be 505 parking spaces instead of the 41 spaces the May 22 staff report analysis indicated. Interestingly, the 505 space requirement based on City Parking Code for restaurants tracks perfectly with the estimate of 500 vehicles that would arrive and need to park that we developed based on reasonable vehicle usage shares and vehicle occupancy assumptions in the prior section.

In summation, the correct parking requirement for the Project's Mixed-Use Hotel Option, considering all of the Project uses and the appropriately applicable rates from City Parking Code is 203 spaces for the residential condominiums, 95 spaces for the hotel guest rooms, and 505 spaces for the restaurant and function rooms for a total of 803 parking spaces. This is in contrast to the FEIR that, using the wrong rates for the condos and hotel rooms and failing to make any provision for the restaurant and function rooms, calculates the requirement at 475. It also contrasts with the May 22, 2008 staff report that, using the right rates for the condos and hotel rooms, but using an incorrect floor area for the restaurant and function rooms and applying an incorrect and unsubstantiated rate to that area, calculates the requirement at 339 spaces. Viewed in the context of the 475 spaces the Project Description indicates would be provided, the FEIR indicates a perfect match between spaces required and parking spaces provided, the May 22, 2008 staff report indicates the Project would provide a surplus over what it erroneously concludes is the requirement, while a correct analysis shows that the Project's parking requirement would exceed the spaces the Project provides by a total of 328 spaces (475 provided, 803 required). It is unclear whether this large parking deficit can be made up with other available parking in the Project area since the deficit was not identified for consideration nor was any analysis done to quantify whether there was sufficient available parking in the area during the P.M. peak to offset the deficit. Since neither the FEIR nor the May 22, 2008 staff report on the issue presented at the Planning Commission hearing where the FEIR was acted on correctly identify this deficit,

to say nothing of whatever other parking supply in the immediate Project Area might be available to offset it, the public and the Commission did not have adequate information to support a reasoned decision.

Response –to-Comment M-13 Is Evasive and Inadequate

Our April 14, 2008 comment now labeled M-13 in the FEIR concerned the lack of analysis to consider whether the same sized loading dock facility that was proposed for the Residential Option for the project remained adequate for the Mixed-Use Hotel Option given the much more demanding truck loading needs to service the hotel housekeeping needs, restaurant and banquet rooms and conference facilities. The response, that “this is a planning issue, not an environmental issue” subject to CEQA is pure evasion and not a reasonable or substantive response to a reasonable substantive question. If truck loading facilities are undersized for the project, trucks arriving when the loading bays are occupied will either stand in the street or alley until loading bay space becomes available or will undertake loading/unloading operations parked on-street or in the alley. This poses the potential for traffic operational and safety impacts which are clearly an environmental issue. The FEIR is clearly inadequate in the absence of a substantive response on this item.

Response-to-Comment M-14 Is Evasive and Inadequate

Comment M-14 was a further discussion concerning the traffic safety and operations impacts that the close spacing of the intersections of the existing alley and the porte-cochere facility with 10th Street would engender, especially with the likely back-ups from the porte cochere area. The FEIR response claims that the spacing of these intersections is a “design issue” that is a “planning issue” rather than an “environmental issue”. This response is pure evasive nonsense. When a “design issue” causes potentially significant traffic impacts, that impactful consequence of design is an environmental issue and is subject to the disclosure and mitigation requirements of CEQA. If the kind of evasive reasoning typified in this response is tolerated, the City could assert that, for instance, a serious air pollution impact is a “social issue” that is a “planning issue” rather than an “environmental issue” and therefore not subject to CEQA. Through a progressive series of such rationalizations, the City could essentially gut CEQA. The FEIR is inadequate, unreasonable and irresponsible in this response.

Response-to-Comment M-15 Is Inadequate and the Entire FEIR Traffic Analysis Is Inadequate Because It Is Based On Flawed Data.

Comment M-15 concerned previously commented-on flaws in the existing traffic database used in analysis of the Metropolitan Project that have never been corrected. The FEIR response claims that since Caltrans raised the initial

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concerns about the traffic data base and that since Caltrans has not reiterated those concerns in comments at subsequent iterations of environmental documentation on this and other projects, it is OK for the FEIR to be based on the flawed data.

The facts that Caltrans was the first to identify existing conditions data inadequacies, and that subsequent to identifying the flawed traffic data, Caltrans has focused its comments on development EIRs in downtown Sacramento on the issue that is most important to Caltrans – that the downtown projects make fair-share contributions to mitigation of freeway traffic impacts – and has not repeated demands for correction of the data, do not make it OK for the Metropolitan FEIR to continue to base its analysis on flawed data that results in serious understatement of the project's impacts.

In addition, FEIR response M-15 presents an incomplete history of comments and responses on the issue. Caltrans did submit comments on the 2006 Downtown Traffic Study and several concurrent DEIRs based on it (including Metropolitan) in August 2006 and met with City staff on the subject in September, 2006. The City first publicly responded to those comments (and specifically to the issue of flawed existing conditions data) in the context of the FEIR on the 800 K & L project issued in the fall of 2006, another of the impact studies that relied on the Downtown Traffic Study. That response explained how the City had come to rely on flawed data but did not correct the data and analysis. We then commented 800 K & L FEIR, identifying additional flaws in the existing traffic data base and emphasizing the importance of correcting the traffic data base (which averaged 37 percent low on the freeway system) so that the public would have an information document that correctly identified the severity of the traffic impacts. Those comments can be found at pages 7 through 10 of our 12-11-06 letter on the 800 K & L project. These same expanded comments on the subject were reiterated in our 1-9-07 letter of comment on the 500 Capitol Mall project and also in our 8-17-07 letter of comment on the then-current FEIR on Metropolitan. Our comments clearly expand on the issue of the original flaw discovered by Caltrans, have been repeated to the City over time, have been specifically addressed by us to the City in connection with the Metropolitan EIR. They clearly have standing in this matter apart from Caltrans and must be responded-to substantively in the FEIR. Furthermore, the City has corrected the Downtown Traffic Study data for use in other EIRs long before the RDEIR on this project was prepared and could have incorporated that traffic data in the RDEIR and FEIR with minimal effort. For these reasons, the FEIR traffic analysis and FEIR Response M-15 is inadequate.

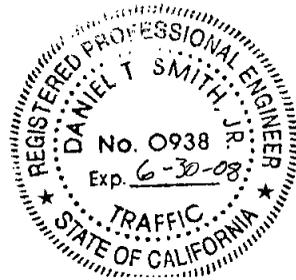
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Conclusion

This completes my current comments on the Metropolitan FEIR. For the above-stated reasons, I do not believe the FEIR is adequate for certification and that the Planning Commissions actions on May 22, 2008 were improper.

Sincerely,

Smith Engineering & Management
A California Corporation



Daniel T. Smith Jr., P.E.
President

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Attachment A

(Trip Generation Analysis Comparing Mixed-Use Hotel Option to Residential Option Comprised of 3-Page Memorandum Dated 17 September, 2007 from Pelle Clarke and Vic Maslanka of DKS Associates to Jesse Gothan, first 3 pages of Appendix B to the RDEIR (pages 91 to 93 of the pdf)).



MEMORANDUM

TO: Jesse Gothan
FROM: Pelle Clarke, Vic Mastanka
DATE: 17 September 2007
SUBJECT: The Metropolitan P/A No. P06095-000
Trip Generation of Alternative Land Use

This memorandum summarizes a comparison of trip generation between the original Metropolitan project (as analyzed in the transportation analysis for the DEIR) and a project alternative.

Land Use

Table 1 summarizes the land use information utilized in the calculations.

Land Use Type	Size	
	Project	Project Alternative
Retail (square feet)	13,000	0
Condominium (units)	320	190
Hotel (rooms)	0	190

Source: DKS Associates, 2007

Methodology

Trip generation of the proposed project is based upon information compiled by the Institute of Transportation Engineers (Trip Generation, Seventh Edition, 2003 and Trip Generation



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Handbook, 2004). The methodology is taken from the Sacramento Downtown Traffic Study (Dowling Associates, 2006).

Trip Generation

Table 2 summarizes the trip generation of the project (as presented in the DEIR) and the project alternative

Table 2 Trip Generation Comparison – New External Vehicle Trips		
Time Period / Direction of Travel	Size	
	Project	Project Alternative
Daily Entering and Exiting	2,221	1,925
A.M. Peak Hour Entering	38	65
A.M. Peak Hour Exiting	98	96
A.M. Peak Hour Entering and Exiting	136	161
P.M. Peak Hour Entering	114	86
P.M. Peak Hour Exiting	93	69
P.M. Peak Hour Entering and Exiting	207	155
Source: DKS Associates, 2007.		

Downtown Sacramento Traffic Study
 Trip Generation for Proposed Projects

Trip Generation Land Use Category	Amount	Source	Trips Generated						Distribution				
			Weekday	AM Peak Hour			PM Peak Hour			AM Peak		PM Peak	
				In	Out	Total	In	Out	Total	In	Out	In	Out
The Metropolitan (10th & J) Project Alternative													
High Rise Residential Condominium	190 Units	ITE (232)	940	16	68	84	50	30	80	19%	81%	62%	38%
Hotel	190 Rooms	ITE (310)	1,695	68	50	118	56	59	115	56%	42%	49%	51%
Total Project Trips			2,635	84	118	202	106	89	195				
Transit Adjustments													
Residential (Daily -2.6%, a.m. -3.4%, p.m. -3.1%)			-24	-1	-2	-3	-1	-1	-2				
Hotel (-4%)			-68	-3	-2	-5	-2	-2	-5				
Total Transit Adjustments			-92	-4	-4	-8	-3	-3	-7				
Walk, Bike & Other Non-Auto Travel Adjustments													
Residential (Daily -9.6%, a.m. -7.9%, p.m. -8.6%)			-90	-1	-6	-7	-4	-3	-7				
Hotel (-18%)			-305	-12	-9	-21	-10	-11	-21				
Total Walk, Bike & Other Non-Auto Travel Adjustments			-395	-13	-15	-28	-14	-14	-28				
Internal Trips Within This Project			0	0	0	0	0	0	0				
Trips To-From Other Proposed Projects			-223	-3	-3	-5	-3	-3	-6				
New External Trips													
High Rise Residential Condominium				13	58	72	44	25	69				
Hotel				51	38	89	42	44	86				
Total				1,825	65	96	161	86	155				
New External Trips Percent of Total Project Trips				73%	77%	82%	80%	81%	78%	79%			
Transit Trips													
Residential (Daily 3.2%, a.m. 4.1%, p.m. 3.7%)			30	1	2	3	2	1	3				
Hotel (4.5%)			76	3	2	5	3	3	5				
Total Transit Trips			106	4	4	8	5	4	8				