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August 11, 2014

BY EMAIL AND HAND DELIVERY

The Honorable Jose Huizar, Chair
Honorable Committee Members
Planning and Land Use Committee
City of Los Angeles
200 North Spring Street, Room 395
Los Angeles, California 90012

Sharon.gin@lacity.org

Re: Case No. DIR-2012-2836-DB-SPR-CDO; ENV-2012-2837-MND—Response to Appeal

Dear Chair Huizar and Honorable Committee Members:

We represent the Metropolitan Pacific Real Estate Group, the Applicant and developer of the 81-unit mixed-use project at 12029-12035 Wilshire Boulevard – the Picasso Brentwood Project ("Project"). In a determination letter dated August 6, 2013, the Planning Director ("Director") adopted Mitigated Negative Declaration ENV-2012-2837-MND (the MND") and approved Density Bonus Compliance Review and Site Plan Review for the Project. The owner of the adjacent Wilshire Motel ("Appellant") appealed the determination to the City Planning Commission ("CPC"). The CPC issued its determination on January 27, 2014, denying the appeal and sustaining the Director's determination ("CPC Determination"), and adopting the MND. Pursuant to Public Resources Code Section 21151(c), the Appellant has appealed the CPC's adoption of the MND to the City Council ("Appeal"). (The CPC's determinations regarding the Density Bonus Compliance Review and Site Plan Review are final, unappealable, and not before this Committee.) This letter responds to the arguments and assertions made in the Appeal

For the reasons set forth below and in the attached memorandums, the Appeal is without merit. We respectfully request that the PLUM Committee recommend that the City Council uphold the CPC's adoption of the MND and deny the Appeal.

Background

The Project consists of the and demolition of three existing one-story commercial buildings on the site and construction of a new, mixed-use, six-story building containing 81

dwelling units, seven of which will be Very Low Income affordable units, and 7,745 square feet of retail use over a subterranean parking garage..

The Project will make a significant contribution to the community, replacing vacant, non-functional commercial buildings with a vibrant mixed-use development. The Project's 81 units will provide much needed housing in an area that is experiencing a shortage of high quality residential apartments at both market rate and low income rent levels. The ground floor retail component of the development will replace 150 lineal feet of vacant low-rise office space. This new retail space will have a dramatic effect on the 12000 block of Wilshire Boulevard by replacing what is essentially a blank wall with active storefronts. The retail will tie in directly with the newly developed restaurant and retail space to the east, and serve as a bridge between the commercial development immediately to the east and west of the site. Streetscape improvements include the replacement of the street trees in front of the Project, which will further enhance the look and feel of the street at the pedestrian level. As the Project would improve the pedestrian environment in the Project vicinity and a number of Project characteristics would serve to make the Project site pedestrian-friendly, the Project would be consistent with the applicable policies of the Walkability Checklist.

The Appeal is Without Merit

The Appeal alleges the Project MND is inadequate. Specifically, the Appeal alleges that (1) there is a "fair argument" of potential significant noise, ground borne vibration, aesthetic, and transportation impacts, (2) mitigation measures are not Project-specific, at least as to potential Wi-Fi impacts, and (3) findings for Site Plan Review Compliance (project compatibility) cannot be made. The attached memorandums contain a detailed point-by-point response to these arguments. The following is a brief summary of these responses:

- Construction noise impacts will be less than significant as the Project will comply with City Noise Ordinances Nos. 144,331 and 161,574 and implement all technically feasible measures. (See Matrix Memo at 1-3.)

- Ground borne vibration impacts will be less than significant. An expert environmental consultant, Matrix Environmental ("Matrix"), independently confirmed this determination. (See Matrix Memo at 3-5.)

- The MND correctly concluded that any light and glare impact to the Wilshire Motel would be mitigated to below significance. Matrix independently confirmed this determination. (See Matrix Memo at 5-7.)

- Under the Los Angeles CEQA Thresholds Guidelines for shade impacts, the Wilshire Motel is not considered shade-sensitive. Thus, analysis of shading impacts on the Wilshire Motel is not required. (See Matrix Memo at 7.)

- Alleged interference with electronic signals is not an impact area that requires CEQA analysis. Appellant provided no evidence to support its allegation. A wireless signal is generated within a building and thus an adjacent building would not interfere. Internet access for all buildings in the area is provided via cable or telephone lines. (See Matrix Memo at 7-8.)

- The Project traffic study and the Los Angeles Department of Transportation ("LADOT") concluded there will be no significant intersection impacts from the Project. The Project traffic engineer confirmed this determination. (See Hirsch Memo at 1.)

- The Project traffic study concluded, and LADOT affirmed, that given the nominal level of net new Project traffic, no significant impacts will result from the use of the alleyway by Project traffic. (See Hirsch Memo at 1-2.)

- The Project traffic study concluded, and LADOT affirmed, that there will be no freeway impacts, including under the LADOT/Caltrans agreement. (See Hirsch Memo at 2-4.)

- Because the Project was specifically designed with a foundation depth that is between 1 foot 4 inches and 2 feet above the measured groundwater table, there will be no groundwater or other hydrological impact from the Project. (See Matrix Memo at 10-11.)

- The MND correctly concluded that there will be no construction air quality impacts at the Wilshire Motel or any other adjacent use. Matrix independently confirmed this determination. (See Matrix Memo at 11-12.)

- All mitigation measures are tied directly to potential Project impacts and the measures are enforceable. Appellant submitted no evidence to the contrary. There is no Wi-Fi impact to mitigate. (See Matrix Memo at 8.)

- The Project height is consistent with the existing zoning and is compatible with the heights of other nearby structures. (See Matrix Memo at 8-10.)

Mitigation Measure Additions and Modifications

The Applicant requests the following additions and modifications to the Project mitigation measures to address further any potential impacts:

Mitigation Measure XII-20 to include the following additional measures:

- Demolition activities shall be performed from west to east to use existing buildings on the Project Site as a noise barrier to the motel.

- The excavation ramp shall be placed away from the adjacent motel to the extent feasible.

- Temporary plywood sheets shall be placed on framing facing east as building erection goes vertical to provide as a noise barrier to the motel.

- A 10-foot-tall acoustical construction sound blanket (e.g., Acoustical Solution Inc. Outdoor Acoustical Blanket (one pound per square foot) Quilted Fiberglass) shall be extended along the entire construction boundary facing the adjacent motel prior to performing any demolition activities that would no longer allow existing buildings on the Project Site to provide a noise barrier to the motel.

- Pile drivers and vibratory rollers shall not be used in the construction of the Project. Use of a large bulldozer and hoe rams shall occur a minimum of 15 feet from existing off-site structures.

Mitigation Measure I-120 be modified as follows:

- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent ~~residential~~ properties or the public right-of-way.

Conclusion

Thank you in advance for your consideration of this matter. For all the aforementioned reasons and those set forth in the attachments to this letter, we ask the PLUM Committee to recommend that the City Council reject the Appeal, uphold the adoption of the MND, and modify the Project mitigation measures as noted above. Please do not hesitate to contact me if you have any questions.

Sincerely,

Dale J. Goldsmith

Damon P. Mamalakis

cc: Naomi Guth, Department of City Planning

Attachments:

A. Appeal Response: The Project is Compatible with Surrounding Uses
B. Environmental Analysis To Respond to Appeal of the Picasso Brentwood Project Approval, Matrix Environmental (June 30, 2014) ("Matrix Memo")
C. Review and Response to GE RealProp, LP Appeal of Mitigated Negative Declaration for Picasso Brentwood Project Located at 12029-12-35 Wilshire Boulevard in the Brentwood Community of the City of Los Angeles (ENV-21-12-2837-MND), Hirsch/Green Transportation Consulting Inc. (June 10, 2014) ("Hirsch Memo")

ATTACHMENT "A"

Appeal Response
The Project is Compatible with Surrounding Uses

Appellant alleges that the Project is not compatible with *its adjacent* use, while trying to argue that compatibility findings for Site Plan Review cannot be made. This is merely a self-serving unsupported allegation. Moreover, Appellant, inappropriately, only looks to the heights of a few existing buildings in the immediate vicinity of the Project site and concludes, incorrectly, incompatibility.

Fundamentally, compatibility is a zoning issue and the Project is fully compliant with the existing zoning. The Project Site is zoned [Q]C4-1L-CDO (Commercial, Limited Height District 1, Community Design Overlay), which permits building heights of up to six stories or 75 feet. The C4 zone permits both the retail and multi-family uses proposed. Thus, the Project uses are allowed under the existing zoning (i.e., by-right) and, therefore, there will be no incompatibility in terms of land use. See also Site Plan Compliance Review Findings – Zoning ("[t]he proposed project conforms to the [Q]C4-1L-CDO zone of the subject site. Mixed-use is allowed."). Additionally, the proposed uses are consistent with and reflect the variety of multi-family residential, retail, and office uses presented throughout the Project vicinity, including within properties adjacent to the Project Site. Accordingly, the proposed uses would be compatible with surrounding development in terms of land use.

Moreover, the Project is compatible with surrounding uses as to height, which vary from one story to over 15 stories. "[T]he proposed six-story building *blends* with the mix of building heights along Wilshire Boulevard which range from one to three stories within the same block as the subject site and up to 15 stories or more along blocks to the immediate east and west." (DIR at page 13, Site Plan Compliance Review Findings, Community Plan Goal 2 (emphasis added).)[1] In fact, directly across the street there is a multi-family development that is the same height as the Project. The DIR separately found, under Finding 4, that the "project consists of an arrangement of buildings and structures . . . that is or will be *compatible with existing and future development* on adjacent properties and neighboring properties."[2] (Finding 4, DIR at page 15 (emphasis added).)[3] Finding 4 specifically looked at height and the adjacent Wilshire Motel and concluded that "set-backs at the upper residential levels reduce the impact of the height and mass

[1] As demonstrated in the Matrix Memorandum, the range of heights of buildings on Wilshire Boulevard within the same block range from one to six stories, not three stories, with a six-story building across the street from the Project site. (Matrix Memorandum at pages 8-10.)

[2] "The proposed six-story building blends with the mix of building heights along Wilshire Boulevard, which range from one to three stories within the same block as the subject site and up to 15 stories or more along blocks to the immediate east and west. Similarly, structures on the south side of Wilshire Boulevard vary in height. Notably, directly across Wilshire Boulevard from the subject site, at 12026 Wilshire Boulevard, a five-story, multi-family development was completed in 2010. Properties to the north, adjacent to the rear alley, are developed with multi-family structures of three stories or more." (Finding 4, CPC Determination at F-8.)

[3] See also DIR Finding 7: "The structures, site plan and landscaping are harmonious in scale and design with existing development . . ." (Finding 7, CPC Determination at F-16.)

on the adjacent one-story buildings to the east and west." (Id.) These findings were independently confirmed by Matrix. (See Matrix Memorandum, November 8, 2013, at pages 1-3 (Attachment 1 to June 30, 2014 Matrix Memo).) Matrix determined that within the context of surrounding properties, most of which also have a 1L Height District zoning designation, the height of the Project building "would be entirely compatible with nearby structures, which include a number of mid-rise and high-rise buildings with heights of up to 24 stories." Thus, "development of up to six stories is permitted by-right per the existing site zoning and based on the heights of other nearby structures, the Project would be compatible with surrounding development in the area." (Id. page 2.)

Finally, the Project is a prime example of the type of development called for in the West Wilshire Community Design Overlay District (West Wilshire CDO) and the newly announced Great Streets Initiative. As stated in the West Wilshire CDO, the local specific plans that govern development along Wilshire to the east and west of Bundy Drive "encourage mixed-use development that would integrate office or retail with housing in a vertical pattern. The General Plan Transportation Element designates Wilshire Boulevard as a Primary Transit Priority Arterial Street. This designation is consistent with mixed-use development." The Project is fully compatible with, and indeed encouraged under, the West Wilshire CDO. See also Site Plan Review Compliance Findings under Community Plan Goal 2 and Community Plan Urban Design Goals. (CPC Determination at F-6 - F-7.)

ATTACHMENT "B"

July 23, 2014

Damon Mamalakis
ARMBRUSTER GOLDSMITH & DELVAC LLP
11611 San Vicente Boulevard, Suite 900
Los Angeles, CA 90049

RE: ENVIRONMENTAL ANALYSIS TO RESPOND TO APPEAL OF THE PICASSO BRENTWOOD PROJECT APPROVAL

Dear Mr. Mamalakis:

In response to the appeal of City of Los Angeles (City) Case No. ENV-2012-2837-MND, referred to herein as the Picasso Brentwood Project (Project), Matrix Environmental, LLC (Matrix) has prepared supplemental responses and analyses regarding the following issues raised in the appeal of the Project: construction noise; ground borne vibration; aesthetics (specifically light/glare and shading); wireless internet networks; site plan review (land use compatibility), hydrology (groundwater), and air quality.[1,2] Each of these issues is addressed below with respect to the specific comments raised in the most recent appeal letters (i.e., November 21, 2013, letter to City Planning Commission and February 4, 2014, Appeal letter; collectively, the Appeal) prepared by The Silverstein Law Firm, representing the Wilshire Motel (Appellant).

Construction Noise

The Initial Study that accompanied the Project's Mitigated Negative Declaration (MND) acknowledged that peak construction noise levels at a given time would exceed the ambient noise level. Thus, Mitigation Measure XII-20 (originally consisting of four individual measures)

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1 *In response to an appeal letter by the same Appellant dated August 21, 2013, Matrix prepared responses in a letter entitled Environmental Analysis to Respond to Appeal of the Picasso Brentwood Project Approval, dated November 8, 2013, provided in Attachment 1.*

2 *Traffic responses are addressed separately in a memo prepared by Hirsch/Green Transportation Consulting, Inc., dated June 10, 2014.*

was included to reduce the Project's construction noise levels to the extent feasible. As the mitigation measures in the MND constitute the application of technically feasible mitigation, impacts were considered to be less than significant, pursuant to the applicable provisions of Los Angeles Municipal Code (LAMC) Section 112.05. Based on recent comments by the Appellant regarding construction noise, further review of technically feasible mitigation measures was conducted. As a result, it was determined that an acoustical construction sound blanket could be used to further reduce noise impacts. Specifically, given site constraints, a 10-foot-tall acoustical construction sound blanket (e.g., Acoustical Solution Inc. Outdoor Acoustical Blanket (one pound per square foot) Quilted Fiberglass) could be extended along the entire construction boundary facing the Wilshire Motel. A 10-foot-tall barrier would sufficiently break the line-of-sight to motel windows facing the construction site. A taller barrier would not provide any significant improvements since the motel is a single story. ***The noise barrier would provide an overall 10-dBA reduction in construction noise levels*** during the demolition, excavation, and foundation phases. Once Project construction reaches the building erection phase and building height increases, the effectiveness of the noise barrier would diminish as it would no longer break the line-of-sight to motel windows facing the construction site. However, a measure to address noise once building height increases was previously proposed by the Applicant.

Specifically, the Applicant previously proposed that the following mitigation measures be incorporated into the noise Mitigation Measures (XII-20) to further reduce construction noise levels from the Project to the extent feasible:[3]

- Demolition activities shall be performed from west to east to use existing buildings on the Project Site as a noise barrier to the motel.
- The excavation ramp shall be placed away from motel to the extent feasible.
- Temporary plywood sheets shall be placed on framing facing east as building erection goes vertical to provide as a noise barrier to the motel.

[3] *These measures were listed in Matrix's Environmental Analysis to Respond to Appeal of the Picasso Brentwood Project Approval, dated November 8, 2013 (see Attachment 1).*

It is further recommended that the following mitigation measure be incorporated into the noise Mitigation Measures (XII-20) to further reduce construction noise levels from the Project to the extent feasible:

- A 10-foot-tall acoustical construction sound blanket (e.g., Acoustical Solution Inc. Outdoor Acoustical Blanket (one pound per square foot) Quilted Fiberglass) shall be extended along the entire construction boundary facing the adjacent motel prior to performing any demolition activities that would no longer allow existing buildings on the Project Site to provide a noise barrier to the motel.

Even with incorporation of these additional mitigation measures, temporary and intermittent noise levels above 75 dBA may be experienced, primarily where the line-of-sight would not be interrupted. As the Project's mitigation measures collectively constitute the application of technically feasible mitigation, impacts are considered to be less than significant, pursuant to the applicable provisions of LAMC Section 112.05. Therefore, ***construction noise impacts associated with the Project would be less than significant***. No additional mitigation measures or changes to the MND are warranted.

Ground-Borne Vibration

In response to the Appeal, additional analysis has been undertaken to assess potential construction vibration impacts. It should first be noted that the City does not have any adopted standards, guidelines, or thresholds relative to ground-borne vibration. As such, available guidelines from the Federal Transit Administration (FTA) are used to assess impacts due to ground-borne vibration. The FTA has published a technical manual titled "Transit Noise and Vibration Impacts Assessment," which provides ground-borne vibration impact criteria with respect to building damage during construction activities.[4] Building vibration damage is measured in peak particle velocity (PPV). According to FTA guidelines, a vibration criterion of 0.20 PPV should be considered as the significant impact level for non-engineered timber and masonry buildings and would be applicable to the adjacent motel use. The FTA vibration level threshold of 0.2 PPV is specifically set well below the actual damage-producing vibrations in order to reduce complaints and damage.

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[4] *Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006.*

The Project would generate ground-borne on-site construction vibration during site demolition, excavation, and grading activities where heavy construction equipment, such as bulldozers, would be used. Pile drivers and vibratory rollers, which produce excessive vibration, would not be used. A list of potential construction equipment to be used for the Project was included in the Air Quality Worksheets provided in Attachment B of the Environmental Analysis to Respond to Appeal of the Picasso Brentwood Project Approval dated November 8, 2013 (Attachment 1). The FTA has published standard peak vibration velocities for various construction equipment operations. The typical vibration levels at a reference distance of 25 feet for construction equipment anticipated to be used during Project construction are listed in Table 1 on page 5.[5] As indicated therein, peak vibration velocities from typical heavy construction equipment operations during Project construction would range from 0.003 to 0.089 PPV at a distance of 25 feet from the equipment. While construction equipment would operate at a distance of greater than 25 feet from the motel during the vast majority of the construction duration, proposed equipment could temporarily operate as close as 15 feet to the motel buildings.

Table 1 presents the maximum expected vibration at the motel buildings due to the operation of on-site construction equipment as extrapolated for a distance of 15 feet, based on the method established by the FTA and as described in its Transit Noise and Vibration Impact Assessment. As shown, the estimated vibration velocity levels for construction activities would be below the significance threshold of 0.20 PPV for non-engineered timber and masonry buildings as set forth by the FTA. As such, ***ground-borne construction vibration impacts would be less than significan***t. Nonetheless, the following mitigation measure shall be incorporated into the noise Mitigation Measures (XII-20) to further ensure construction vibration levels from the Project are less than significant:

- Pile drivers and vibratory rollers shall not be used in the construction of the Project. Use of a large bulldozer and hoe rams shall occur a minimum of 15 feet from existing off-site structures.

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[5] *Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006.*

Table 1
Construction Equipment Vibration Levels

Equipment	Reference Vibration Velocity Levels at 25 ft. (PPV)	Vibration Velocity Level at 15 ft. (PPV)
Large Bulldozer	0.089	0.19
Hoe Ram	0.089	0.19
Loaded Trucks	0.076	0.16
Jackhammer	0.035	0.08
Small Bulldozer	0.003	0.01

Source: Federal Transit Administration, 2006.

Aesthetics (Light/Glare and Shading)

Light/Glare

According to the *City of Los Angeles CEQA Thresholds Guide*, land uses that are considered sensitive to nighttime light include, but are not limited to: residential uses, including board and care facilities; some commercial and institutional uses that require minimal nighttime illumination for proper function, physical comfort, or commerce; and natural areas. Uses that are sensitive to glare generally include those uses that are light-sensitive, as well as transportation corridors (i.e., roadways). Based on these definitions, light- and glare-sensitive land uses in the Project vicinity include the residential uses located north of the Project Site, as identified in the Initial Study prepared for the Project, as well as the motel to the immediate east (i.e., the Wilshire Motel).

Light and glare impacts to the motel would be similar to the Project's impacts on the adjacent residential uses, as disclosed in the Initial Study. The following mitigation measures were identified as Mitigation Measures I-120 and I-130 to reduce such impacts to a less than significant level:

- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.
- The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints

or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

The Project Applicant's intention with respect to these mitigation measures, and the lighting measure in particular, was to implement such design features throughout the Project site so as to benefit all adjacent uses, including the motel to the immediate east. As such, the Applicant has agreed to modify the measure to apply to all adjacent properties, as follows:

- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent ~~residential~~ properties or the public right-of-way.

In addition, the Project would be subject to various regulatory requirements that govern lighting. The City regulates lighting with respect to building and safety, transportation, and light spill.[6] Exterior lighting, such as streetlights and illuminated signs, is regulated by the Los Angeles Municipal Code (LAMC). Applicable regulations for the Project Site include the following:

- Chapter 1, Article 2, Sec. 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises. Exception: All parking areas and garages provided for three or more dwelling units or guest rooms shall have an average surface illumination of not less than 0.2 foot-candles.

- Chapter 1, Article 4.4, Sec. 14.4.4 E. No sign shall be arranged and illuminated in such a manner as to produce a light intensity greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

- Chapter 9, Article 3, Div. 1, Sec. 93.0117(b). No exterior light source may cause more than two foot-candles of lighting intensity or generate direct glare from the light source onto: an exterior glazed window or glass door on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue, or lawn areas or any other property containing a residential unit

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[6] *Light spill (also known as light spillage or light spillover) is the amount of light that falls onto a neighboring property and is expressed in terms of illuminance.*

or units. Exceptions are specified for frosted light sources, light sources not visible to persons on other residential property, and other circumstances.

- Chapter 9, Article 9, Division 5, Sec 99.05.106.8. Outdoor lighting systems shall be designed and installed to comply with the minimum requirements in the California Energy Code for Lighting Zones 1-4 as defined in Chapter 10 of the California Administrative Code (all urban areas in California are designated as Lighting Zone 3). Maximum Backlight, Uplight and Glare (BUG) ratings are also defined for each Lighting Zone.

With implementation of the mitigation measures listed above, as modified, and compliance with applicable LAMC requirements, ***light and glare impacts to the Wilshire Motel would be mitigated to a less than significant level***, similar to impacts on the adjacent residential properties.

Shading

As it relates to shading, the *City of Los Angeles CEQA Thresholds Guide* identifies the following facilities and operations as sensitive to the effects of shading: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. Such uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Based on this definition, the motel located adjacent to the Project Site is not considered shade-sensitive under the *City of Los Angeles CEQA Thresholds Guide*. As such, ***analysis of shading impacts on the motel is not required under CEQA***, as previously discussed in our Environmental Analysis to Respond to Appeal of the Picasso Brentwood Project Approval dated November 8, 2013 (Attachment 1).

Wireless Internet Networks

The Appeal expresses "concern" regarding potential interference with Wi-Fi signal due to the introduction of a six-story building within the Project Site. This is not an environmental issue addressed within the City's Initial Study Checklist or Appendix G of the State CEQA Guidelines. As such, it is not required to be analyzed under CEQA. Moreover, this issue is not analogous, as suggested in the Appeal, to environmental issues such as light, air, and noise, each of which relate to the natural environment, are easily measurable, and are specifically regulated under CEQA.

Regardless, the Appellant seems to misunderstand the way Wi-Fi networks operate. Wi-Fi signals consist of radio waves emitted from a wireless transmitter, such as a router, that is connected (i.e., wired) to one's broadband internet connection (typically available through one's telephone or cable line). The wireless transmitter converts data obtained via the wired internet connection and converts it to a radio signal which is then broadcast, thus making available an internet signal that other computers can connect to wirelessly. Within any given property, a wireless signal generally would not be available unless broadcast from a wired transmitter within that site. Thus, the introduction of an adjacent building would not have a bearing on a signal within the site, in this case the Wilshire Motel.[7]

In any event, there is no evidence to support a claim that Project implementation would interrupt or obstruct Wi-Fi signals serving the adjacent motel. Furthermore, CEQA does not require the analysis of speculative issues. CEQA Guidelines Section 15064(d)(3) specifies that a change which is speculative or unlikely to occur is not reasonably foreseeable and thus need not be evaluated. CEQA Guidelines Section 15145 goes on to indicate that a Lead Agency, after thorough investigation, need not pursue analysis of a particular impact if considered too speculative for evaluation. Accordingly, ***while no impact to the Wilshire Motel's Wi-Fi network is anticipated, further analysis of this issue is not required under CEQA***. As such, no mitigation is required, as alleged by the Appellant.

Site Plan Review (Land Use Compatibility)

The Project Site is zoned [Q]C4-1L-CDO (Commercial, Limited Height District 1, Community Design Overlay), which permits building heights of up to six stories or 75 feet. Accordingly, ***the Project's building height is allowed by-right***. The adjacent property at 12023 Wilshire Boulevard has the same [Q]C4-1L-CDO zoning, although the existing Wilshire Motel in that location consists of a single-story use. While the introduction of a six-story building adjacent to single-story development may present a degree of visual contrast, such development is not inherently incompatible, as suggested in the appeal letter. Further, within the context of the surrounding properties, most of which also have a 1L Height District zoning designation, the height of the proposed building would be entirely compatible with nearby structures, which include a number of mid-rise and high-rise buildings with heights of up to 24 stories.

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7 *British Broadcasting Company, WebWise: What is Wireless Internet (Wi-Fi)?, www.bbc.co.uk/webwise/guides/about-wifi, accessed June 19, 2014.*

As indicated in the memorandum and associated photographs prepared by Jared Weinstock of Metropolitan Pacific Real Estate Group (see Attachment A within Attachment 1), existing development within a one- to two-block distance along Wilshire Boulevard includes the following:

- 12121 Wilshire Boulevard—14 stories or approximately 196 feet tall
- 12100 Wilshire Boulevard—19 stories or approximately 267 feet tall
- 12026 Wilshire Boulevard (i.e., directly across the street from the property immediately west of the Project Site)—6 stories
- 11952 Wilshire Boulevard—4 stories
- 11859 Wilshire Boulevard—5 stories or approximately 64 feet tall
- 11818 Wilshire Boulevard—4 stories
- 11766 Wilshire Boulevard—17 stories
- 11755 Wilshire Boulevard—24 stories

As shown on the map included in Attachment A within Attachment 1, the block across the street from the Project Site includes a six-story building; at the corner one block to the southwest, 14- and 19-story buildings are located along either side of Wilshire Boulevard. Other mid- to high-rise development in close proximity includes 4- to 24-story buildings.

As stated in the Initial Study prepared for the Project, the Project Site is located in a built-up neighborhood in transition from industrial/manufacturing/retail to multi-family residential. The Initial Study also indicates the Project's massing is appropriate to the surrounding context and will fit the character of the immediate neighborhood. Furthermore, the Findings prepared to support DIR-2012-2836-DB-SPR-CDO state: "[t]he proposed six-story building blends with the mix of building heights along Wilshire Boulevard which range from one to three stories within the same block as the subject site and up to 15 stories or more along blocks to the immediate east and west. Similarly, structures on the south side of Wilshire Boulevard vary in height. Notably, directly across Wilshire Boulevard from the subject site, at 12026 Wilshire Boulevard, a five-story, multi-family development was completed in 2010. Properties to the north, adjacent to

the rear alley, are developed with multi-family structures of three stories or more."[8] This same Finding indicates "the project consists of an arrangement of buildings and structures (including height, bulk and setbacks)... that is or will be compatible with existing and future development on adjacent properties and neighboring properties," and goes on to state "set-backs at the upper residential levels reduce the impact of the height and mass on the adjacent one-story buildings to the east and west."[9]

It is also noted that the recently adopted 2012–2035 Regional Transportation Plan/ Sustainable Communities Strategy (2012–2035 RTP/SCS) by the Southern California Association of Governments (SCAG) emphasizes the development of new housing and employment centers in high-quality transit areas and other opportunity areas, including commercial corridors. The Project Site (12029–12035 Wilshire Boulevard) is located within a designated High-Quality Transit Area (HQTA) and is therefore targeted for development at increased densities in order to accommodate projected growth and facilitate transit use.[10]

In conclusion, given that development of up to six stories is permitted by-right per the existing site zoning, the proposed development would be compatible with the heights of other nearby structures, and the Project Site is targeted for higher density development, ***the Project would be compatible in terms of building height with surrounding development in the area***.

Hydrology (Groundwater)

The Appeal also asserts the potential for hydrology impacts. Hydrology impacts, including impacts associated with groundwater, were determined to be less than significant within the Initial Study. The Appeal indicates there is a high water table in the Project vicinity that may be impacted by Project development. As indicated in the Groundwater Borings Memorandum (see Attachment C within Attachment 1) prepared by Van Tilberg, Banvard & Soderbergh, AIA, three borings taken within the Project Site encountered groundwater at elevations ranging from 243.5 feet to 245.5 feet above mean sea level (AMSL). These

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[8] *DIR-2012-2836-DB-SPR-CDO Determination Letter, Finding 4, page 15.*

[9] *Ibid.*

[10] *Electronic correspondence, Kimberly Clark, Senior Regional Planner, Southern California Association of Governments, June 25, 2014.*

elevations correspond to 16.5 feet to 17 feet below ground surface (bgs). Three borings are considered more than sufficient to determine groundwater elevations within a property the size of the Project Site.[11] Accordingly, the Appellant's comments regarding groundwater elevations are speculative.

As indicated in the Groundwater Borings Memorandum, ***the current Project design involves the use of a matt foundation, the bottom of which would have an elevation ranging from 244.9 feet to 247.5 feet AMSL, or 1.4 feet to 2.0 feet above the water table***. The use of matt foundations limits excavation depths to the elevation of the foundation bottom. Based on this design, Project earthwork would proceed as follows: (1) placement of shoring around the site; (2) removal of soil to approximately 4 inches to 6 inches above the desired elevation to achieve the rough grade elevation; (3) fine grading involving removal of the final 4 inches to 6 inches to create the final subgrade; and (4) preparation of the final subgrade to receive the matt foundation. The City of Los Angeles requires grading inspections to verify the correct elevation and ensure the native soil is undisturbed and sufficiently stable to receive the foundation. A vapor barrier and waterproofing is then applied before the matt foundation is prepared and poured. In this case, the matt foundation will be 30 inches deep, and the lowest point of the foundation would be at an elevation of 244.9 feet AMSL (i.e., above the water table). Accordingly, ***impacts to groundwater beneath the Project Site are not anticipated***.

Air Quality

Contrary to what is stated in the Appeal, an air quality analysis was prepared as part of the Environmental Analysis to Respond to Appeal of the Picasso Brentwood Project Approval dated November 8, 2013 (Attachment 1), which addressed regional and localized construction air quality impacts. The analysis was conducted consistent with South Coast Air Quality Management District (SCAQMD) recommended methodologies and models (e.g., SCAQMD's Final LST Methodology document and SCAQMD's CalEEMod (Version 2013.2.2) software). Although the motel use would not be considered a sensitive receptor per SCAQMD guidance, the use was considered in the analysis to determine whether impacts would occur at the motel. Consistent with SCAQMD LST Methodology, the 25-meter LST thresholds were used to evaluate adjacent uses. In addition, contrary to what is stated in the Appeal, the analysis accounted for haul truck activity (70 haul truck trips during demolition and 1,320 haul truck trips

[11] *Electronic correspondence, Craig Whittaker, Civil Engineer, Alliance Land Planning & Engineering, Inc., June 27, 2014*

during grading/export activities), as well as delivery and construction worker trips. Refer to Appendix B within Attachment 1 for that analysis. Based on the air quality analysis provided therein, ***regional and localized construction impacts were determined to be less than significant***. No additional mitigation measures beyond those specified in the Initial Study (Mitigation Measure III-10, consisting of seven individual measures) would be required.

With respect to wind impacts, the Appeal provides no evidence to support the claim that the Project would create localized gusts or dead spots where dust and debris may accumulate on the motel, and the Appellant's comments regarding wind are speculative. As discussed above, CEQA does not require the analysis of speculative issues. Moreover, the alteration of existing wind patterns is not an environmental issue addressed within the City's Initial Study Checklist or Appendix G of the State CEQA Guidelines. As such, it is not required to be analyzed under CEQA. In any case, there are numerous examples (e.g., southwest corner of Wilshire Boulevard and South Bundy Drive; and southwest corner of Wilshire Boulevard and Chelsea Avenue) within the Project vicinity that provide physical evidence contrary to the claim in the Appeal. Additionally, the Project would not include rooftop restaurant vents that could cause odor impacts.

Should you have any questions or require additional information please feel free to contact us at (424) 207-5333.

Sincerely,

Stephanie Eyestone-Jones
MATRIX ENVIRONMENTAL, LLC
President

Ashley Rogers
MATRIX ENVIRONMENTAL, LLC
Principal Planner

Attachment 1

Environmental Analysis to Response to Appeal of the Picasso Brentwood Project Approval

November 8, 2013

November 8, 2013

Damon Mamalakis
ARMBRUSTER GOLDSMITH & DELVAC LLP
11611 San Vicente Boulevard, Suite 900
Los Angeles, CA 90049

RE: ENVIRONMENTAL ANALYSIS TO RESPOND TO APPEAL OF THE PICASSO BRENTWOOD PROJECT APPROVAL

Dear Mr. Mamalakis:

In response to the appeal of City of Los Angeles Case No. DIR-2012-2836-DB-SPR-CDO and ENV-2012-2837-MND, referred to herein as the Picasso Brentwood Project (Project), Matrix Environmental, LLC (Matrix) has prepared analyses regarding the following issues: land use and visual compatibility; aesthetics (specifically light/glare and shading); construction noise; construction air quality; and hydrology (specifically groundwater). Each of these issues is addressed below with respect to the specific comments raised in the appeal letter prepared by The Silverstein Law Firm, representing the Wilshire Motel.

Land Use and Visual Compatibility

The Picasso Brentwood Project involves the construction of a six-story, mixed-use (multi-family residential and retail) building located at 12029–12035 Wilshire Boulevard (Project Site). The Project Site is zoned [Q]C4-1L-CDO (Commercial, Limited Height District 1, Community Design Overlay), which permits building heights of up to six stories or 75 feet. As the C4 zone permits both the retail and multi-family uses proposed, the Project uses are allowed by-right. Additionally, the proposed uses are consistent with the variety of multi-family residential, retail, and office uses present throughout the Project vicinity, including within properties adjacent to the Project Site. Accordingly, the proposed uses would not be incompatible with surrounding development in terms of land use.

The adjacent property at 12023 Wilshire Boulevard has the same [Q]C4-1L-CDO zoning, although the existing Wilshire Motel in that location consists of a single-story use. While the introduction of a six-story building adjacent to single-story development may present a degree of

visual contrast, such development is not inherently incompatible, as suggested in the appeal letter. Further, within the context of the surrounding properties, most of which also have a 1L Height District zoning designation, the height of the proposed building would be entirely compatible with nearby structures, which include a number of mid-rise and high-rise buildings with heights of up to 24 stories. As indicated in the memorandum and associated photographs prepared by Jared Weinstock of Metropolitan Pacific Real Estate Group (see Attachment A), existing development within a one- to two-block distance along Wilshire Boulevard includes the following:

- 12121 Wilshire Boulevard—14 stories or approximately 196 feet tall
- 12100 Wilshire Boulevard—19 stories or approximately 267 feet tall
- 12026 Wilshire Boulevard (i.e., directly across the street from the property immediately west of the Project Site)—6 stories
- 11952 Wilshire Boulevard—4 stories
- 11859 Wilshire Boulevard—5 stories or approximately 64 feet tall
- 11818 Wilshire Boulevard—4 stories
- 11766 Wilshire Boulevard—17 stories
- 11755 Wilshire Boulevard—24 stories

As stated in the Initial Study prepared for the Project, the Project Site is located in a built-up neighborhood in transition from industrial/manufacturing/retail to multi-family residential. The Initial Study also indicates the Project's massing is appropriate to the surrounding context and will fit the character of the immediate neighborhood. Furthermore, the Findings prepared to support DIR-2012-2836-DB-SPR-CDO state: "[t]he proposed six-story building blends with the mix of building heights along Wilshire Boulevard which range from one to three stories within the same block as the subject site and up to 15 stories or more along blocks to the immediate east and west. Similarly, structures on the south side of Wilshire Boulevard vary in height. Notably, directly across Wilshire Boulevard from the subject site, at 12026 Wilshire Boulevard, a

five-story, multi-family development was completed in 2010. Properties to the north, adjacent to the rear alley, are developed with multi-family structures of three stories or more."[1] This same Finding indicates "the project consists of an arrangement of buildings and structures (including height, bulk and setbacks)... that is or will be compatible with existing and future development on adjacent properties and neighboring properties," and goes on to state "set-backs at the upper residential levels reduce the impact of the height and mass on the adjacent one-story buildings to the east and west."[2]

As development of up to six stories is permitted by-right per the existing site zoning and based on the heights of other nearby structures, the Project also would be compatible in terms of building height with surrounding development in the area.

Aesthetics (Light/Glare and Shadows)

According to the *City of Los Angeles CEQA Thresholds Guide*, land uses that are considered sensitive to nighttime light include, but are not limited to: residential uses, including board and care facilities; some commercial and institutional uses that require minimal nighttime illumination for proper function, physical comfort, or commerce; and natural areas. Uses that are sensitive to glare generally include those uses that are light-sensitive, as well as transportation corridors (i.e., roadways). Based on these definitions, light- and glare-sensitive land uses in the Project vicinity include the residential uses located north of the Project Site, as identified in the Initial Study prepared for the Project, as well as the motel to the immediate east (i.e., the Wilshire Motel).

Light and glare impacts to the motel would be similar to the Project's impacts on the adjacent residential uses, as disclosed in the Initial Study. The following mitigation measures were identified to reduce such impacts to a less than significant level:

- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.

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1 *DIR-2012-2836-DB-SPR-CDO Determination Letter, Finding 4, page 15.*

2 *Ibid.*

- The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-case concrete or fabricated wall surfaces to minimize glare and reflected heat.

The Project Applicant's intention with respect to these mitigation measures, and the lighting measure in particular, was to implement such design features throughout the Project site so as to benefit all adjacent uses, including the motel to the east. As such, the Applicant has agreed to modify the measure to apply to all adjacent properties.[3] Accordingly, any light and glare impacts to the Wilshire Motel would be mitigated to a less than significant level, similar to impacts on the adjacent residential properties.

As it relates to shading, the *City of Los Angeles CEQA Thresholds Guide* identifies the following facilities and operations as sensitive to the effects of shading: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. Such uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Based on this definition, the motel located adjacent to the Project Site is not considered shade-sensitive. As such, analysis of shading impacts on the motel is not required.

The appeal letter also expresses concern regarding potential interference with Wi-Fi and other electronic signals due to the introduction of a six-story building within the Project Site. This is neither an aesthetic issue, nor an environmental one addressed within the City's Initial Study Checklist or Appendix G of the State CEQA Guidelines. In any event, there is no evidence to support a claim that Project implementation would interrupt or obstruct electronic signals serving the adjacent motel. Wi-Fi signals for use within a given property are typically emitted from a wired device within that property. As for other electronic signals, the Applicant has confirmed that cell reception and radio signals are available within other surrounding properties that are located adjacent to tall buildings.

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[3] *Modification of the lighting mitigation measure entails striking out the term "residential."*

Construction Noise

Section 112.05 of the Los Angeles Municipal Code (LAMC) limits noise levels generated by construction equipment when construction activities are located within 500 feet of a residential zone to 75 dBA, as measured at a distance of 50 feet from the source. Although this provision does not reference motels, it would be reasonable to assume that guests at motels could be sensitive to construction noise. Compliance with this standard is only required where "technically feasible."[4] In addition, the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. In general, the City of Los Angeles Department of Building and Safety enforces noise ordinance provisions relative to equipment, and the Los Angeles Police Department (LAPD) enforces provisions relative to noise generated by people.

The Initial Study acknowledged construction activities for the Project would result in a temporary increase in ambient noise levels. However, construction would comply with the City's Noise Ordinance Nos. 144,331 and 161,574, and no construction activities would occur during late evening and nighttime hours or on Sundays. Peak construction noise levels for most of the equipment used during Project construction would range from 70 dBA to 95 dBA at a distance of 50 feet from the source. These estimates of peak noise levels are based on conservative assumptions and would be relatively infrequent and temporary. The average (L_{eq}) noise level generated by construction activity typically ranges from 77 dBA to 89 dBA at a distance of 50 feet.[5] In general, noise levels would be less than those levels, since the noisiest equipment is not used continuously. Additionally, in accordance with Mitigation Measure XII-20, the noisiest construction equipment would not be operated simultaneously.

Noise levels diminish at a rate of approximately 6 dBA per doubling of distance. Thus, a noise level of 89 dBA at a reference distance of 50 feet would be about 83 dBA at 100 feet and 77 dBA at 200 feet. As heavy equipment passes near the eastern boundary of the Project Site,

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[4] In accordance with the City of Los Angeles Noise Ordinances, "technically feasible" means that the established noise limitations cannot be complied with at a project site, despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

[5] Per USEPA 1971, average noise levels by activity type generally are: ground clearing—84 dBA; excavation—89 dBA; foundations—77 dBA; building erection/finishing—89 dBA.

the peak construction noise level at a given moment in time could reach 90 dBA or more; as equipment travels near the center of the Project Site, it would be approximately 50 feet from the Project Site boundary and generate a lower noise level of approximately 83 dBA. This noise level would exceed the ambient noise level absent mitigation. However, it is noted that the Project Site is located along Wilshire Boulevard, which experiences high traffic volumes and is not considered a quiet or serene noise environment during daytime hours (i.e., during the hours that proposed construction activities would occur).

The noise Mitigation Measures (XII-20) specified in the MND would substantially reduce construction noise levels from the Project. In addition, the following mitigation measures shall be incorporated into the noise Mitigation Measures (XII-20) to further reduce construction noise levels from the Project to the extent feasible.

- Demolition activities shall be performed from west to east to use existing buildings on the Project Site as a noise barrier to the motel.
- The excavation ramp shall be placed away from motel and residences to the extent feasible.
- Temporary plywood sheets shall be placed on framing facing east as building erection goes vertical to provide as a noise barrier to the motel.

Even with incorporation of these mitigation measures, noise levels above 75 dBA may be experienced under those conditions where the line-of-sight would not be interrupted. As the mitigation measures in the MND constitute the application of technically feasible mitigation, impacts are considered to be less than significant, pursuant to the applicable provisions of the LAMC (Section 112.05). Therefore, construction noise impacts associated with the Project are anticipated to be less than significant. No additional mitigation measures or changes to the MND are warranted.

Construction Air Quality

The appeal letter states that the motel is a sensitive receptor for dust and other construction-related air quality emissions. However, the South Coast Air Quality Management District (SCAQMD), in its 1993 *CEQA Air Quality Handbook*, defines a sensitive receptor to be people who are more likely to be affected by air pollution emissions, including “children, the

elderly, persons with pre-existing respiratory and/or cardiovascular illness, and athletes who engage in frequent exercise." SCAQMD goes on to state, "[t]hus, residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields are defined as sensitive receptors…" As a result, the motel would not warrant analysis as a sensitive receptor for air quality impacts in the City's MND. Nonetheless, in response to the appeal, further analysis of this issue was conducted to support the conclusion in the MND that mitigation measures would be sufficient to reduce regional and localized short-term construction air quality impacts at adjacent properties to a less than significant level.

The analysis of potential regional and localized short-term construction air quality impacts was conducted consistent with SCAQMD recommended methodology and thresholds. Daily regional emissions during construction were forecasted by assuming a conservative start date (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile-source and fugitive dust emissions factors derived from the SCAQMD-recommended California Emissions Estimator Model (CalEEMod). Details of the modeling assumptions and emission factors are provided in Attachment B. The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to: remove existing pavement and buildings; grade and excavate the Project Site; construct the proposed buildings, structures, and related improvements; and plant new landscaping within the Project Site. Construction tasks were aggregated to reflect overlapping tasks and identify the maximum construction emissions occurring over the course of Project construction.

The localized effects from the on-site portion of daily emissions were evaluated at adjacent land uses potentially impacted by the Project according to the SCAQMD's localized significance threshold (LST) methodology, which utilizes on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate. LSTs are only applicable to the following criteria pollutants: respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), carbon monoxide (CO), and nitrogen oxides (NO_X). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of the pollutants for each source receptor area and distance to the nearest sensitive receptor. For PM_{10} and $PM_{2.5}$, LSTs were derived based on requirements in SCAQMD Rule 403, Fugitive Dust. The mass rate look-up tables were developed for each

source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts.

Construction of the Project would commence with demolition of the existing surface parking lot and buildings, followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/ concrete installation, and landscape installation. It is estimated that approximately 9,000 cubic yards (cy) of soil export material would be hauled from the Project Site during the excavation phase.

Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as dozers, loaders, and cranes. During the finishing phase of a building, paving operations and the application of architectural coatings (e.g., paints) and other building materials would potentially release volatile organic compounds (VOCs). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

In order to provide a conservative analysis, it was assumed that all construction activities would be completed within the minimum timeframe anticipated for construction. Additional details of construction activities (i.e., demolition, site preparation/excavation, and building construction) and the equipment that would be used during Project construction are provided in Attachment B.

The emissions levels in Table 1 on page 9 represent the highest daily emissions projected to occur during construction. As presented in Table 1, construction-related daily maximum regional and localized construction emissions would not exceed any of the SCAQMD daily significance thresholds. Therefore, consistent with the conclusions provided in the MND, construction emissions resulting from the Project would result in a less than significant regional short-term air quality impact and less than significant localized impacts at adjacent land uses. No additional mitigation measures are warranted.

Table 1
Unmitigated Proposed Project—Estimate of Regional and Localized Construction Emissions[a]
(pounds per day)

Construction Year	VOC[b]	NO_X	CO	SO_X	PM_{10}[c]	$PM_{2.5}$[c]
Regional Emissions						
Maximum Construction Emissions	35	44	37	<1	4	3
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(40)	(56)	(513)	(150)	(146)	(52)
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
Maximum Construction Emissions		33	21		2.4	2.2
SCAQMD Daily Significance Thresholds[d]		44	562		4.0	3.0
Over/(Under)		(11)	(541)		(1.6)	(0.8)
Exceed Threshold?		No	No		No	No

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Attachment B (CalEEMod Output) of this document.*
[b] *VOC and ROG are used interchangeably, for purposes of this analysis, since ROG represents approximately 99.9 percent of VOC emissions. Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates ROG emissions.*
[c] *PM_{10} and $PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*
[d] *Maximum active construction activities would occur on less than one acre at a distance of approximately 25 meters from land uses (closest distance provided in SCAQMD's LST guidelines and SCAQMD recommended distance for analysis of impacts to adjacent land uses). Therefore, SCAQMD's LSTs for Source Receptor Area 2 (one acre site area at 25 meters) was selected to evaluate potential localized construction impacts.*

Source: Matrix Environmental, 2013.

Hydrology (Groundwater)

Hydrology impacts, including impacts associated with groundwater, were determined to be less than significant within the Initial Study. The appeal letter indicates there is a high water table in the Project vicinity that may be impacted by Project development. As indicated in the Groundwater Borings Memorandum (see Attachment C) prepared by Van Tilberg, Banvard & Soderbergh, AIA, three borings taken within the Project Site encountered groundwater at

elevations ranging from 243.5 feet to 245.5 feet above mean sea level (AMSL). These elevations correspond to 16.5 feet to 17 feet below ground surface (bgs).

As indicated in the Groundwater Borings Memorandum, the current Project design involves the use of a matt foundation, the bottom of which would have an elevation ranging from 244.9 feet to 247.5 feet AMSL, or 1.4 feet to 2.0 feet above the water table. The use of matt foundations limits excavation depths to the elevation of the foundation bottom. Based on this design, Project earthwork would proceed as follows: (1) placement of shoring around the site; (2) removal of soil to approximately 4 inches to 6 inches above the desired elevation to achieve the rough grade elevation; (3) fine grading involving removal of the final 4 inches to 6 inches to create the final subgrade; and (4) preparation of the final subgrade to receive the matt foundation. The City of Los Angeles requires grading inspections to verify the correct elevation and ensure the native soil is undisturbed and sufficiently stable to receive the foundation. A vapor barrier and waterproofing is then applied before the matt foundation is prepared and poured. In this case, the matt foundation will be 30 inches deep, and the lowest point of the foundation would be at an elevation of 244.9 feet AMSL (i.e., above the water table). According, impacts to groundwater beneath the Project Site are not anticipated.

Should you have any questions or require additional information please feel free to contact us at (424) 207-5333.

Sincerely,

Stephanie Eyestone-Jones
MATRIX ENVIRONMENTAL, LLC
President

Ashley Rogers
MATRIX ENVIRONMENTAL, LLC
Principal Planner

Attachments

Attachment A

Memorandum and Photographs of Surrounding Development

MP

METROPOLITAN PACIFIC
CAPITAL, INC.

Memo

From: Jared M. Weinstock

RE: Photographs of Wilshire Boulevard

The attached photographs were taken by me on Wednesday, October 30, 2013 at around 4:30pm PST. The photographs are of the following buildings:

- 12121 Wilshire Boulevard (Blue pinpoint) - Photograph was taken from the Southeast corner of Wilshire Blvd. and Bundy, while facing the Northwest corner. The building is comprised of fourteen (14) floors and is estimated to be around one hundred and ninety-six (196) feet tall.

- 12100 Wilshire Boulevard (Yellow pinpoint) - Photograph was taken from the Southeast corner of Wilshire Blvd. and Bundy, while facing the Southwest corner. The building is comprised of nineteen (19) floors and is estimated to be around two hundred and sixty-seven (267) feet tall.

- 12026 Wilshire Boulevard (Purple pinpoint) - Photograph was taken from the North side of Wilshire Boulevard between Bundy and Saltair, looking South. The building is comprised of six (6) floors.

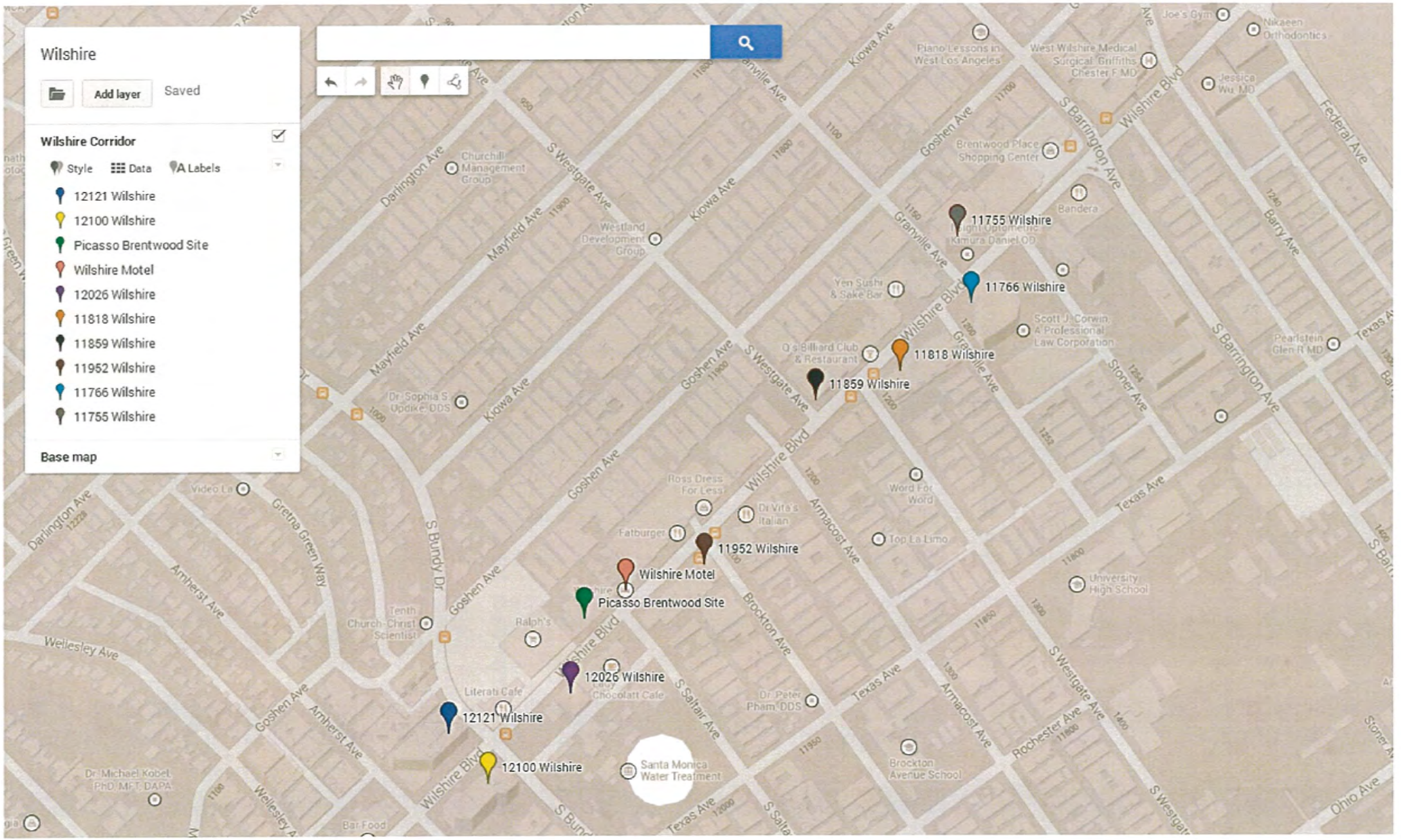
- 11952 Wilshire Boulevard (Brown pinpoint) - Photograph was taken from the Northeast side of Wilshire Blvd. at the Saltair intersection while looking Southeast. The building is comprised of four (4) stories.

- 11859 Wilshire Boulevard (Black pinpoint) - Photograph was taken from the Northwest corner of Wilshire Blvd. and S Westgate Ave. while looking East. The building is comprised of

five (5) floors and is estimated to be around seventy-eight (78) feet tall.

- 11818 Wilshire Boulevard (Orange pinpoint) - Photograph was taken from the Northwest intersection of S Westgate Ave. and Wilshire Blvd, looking Southeast. The building is comprised of four (4) floors.
- 11766 Wilshire Boulevard (Turquoise pinpoint) - Photograph was taken from the Northwest intersection of S Westgate Ave. and Wilshire Blvd, looking Southeast. The building is comprised of Seventeen (17) floors.

- 11755 Wilshire Boulevard (Grey pinpoint) - Photograph was taken from the Northwest corner of Wilshire Blvd. and S Westgate Ave. while looking East. The building is comprised of twenty-four (24) floors.


Wilshire
Add layer
Saved
Wilshire Corridor
Style
Data
A Labels
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12100 Wilshire
Picasso Brentwood Site
Wilshire Motel
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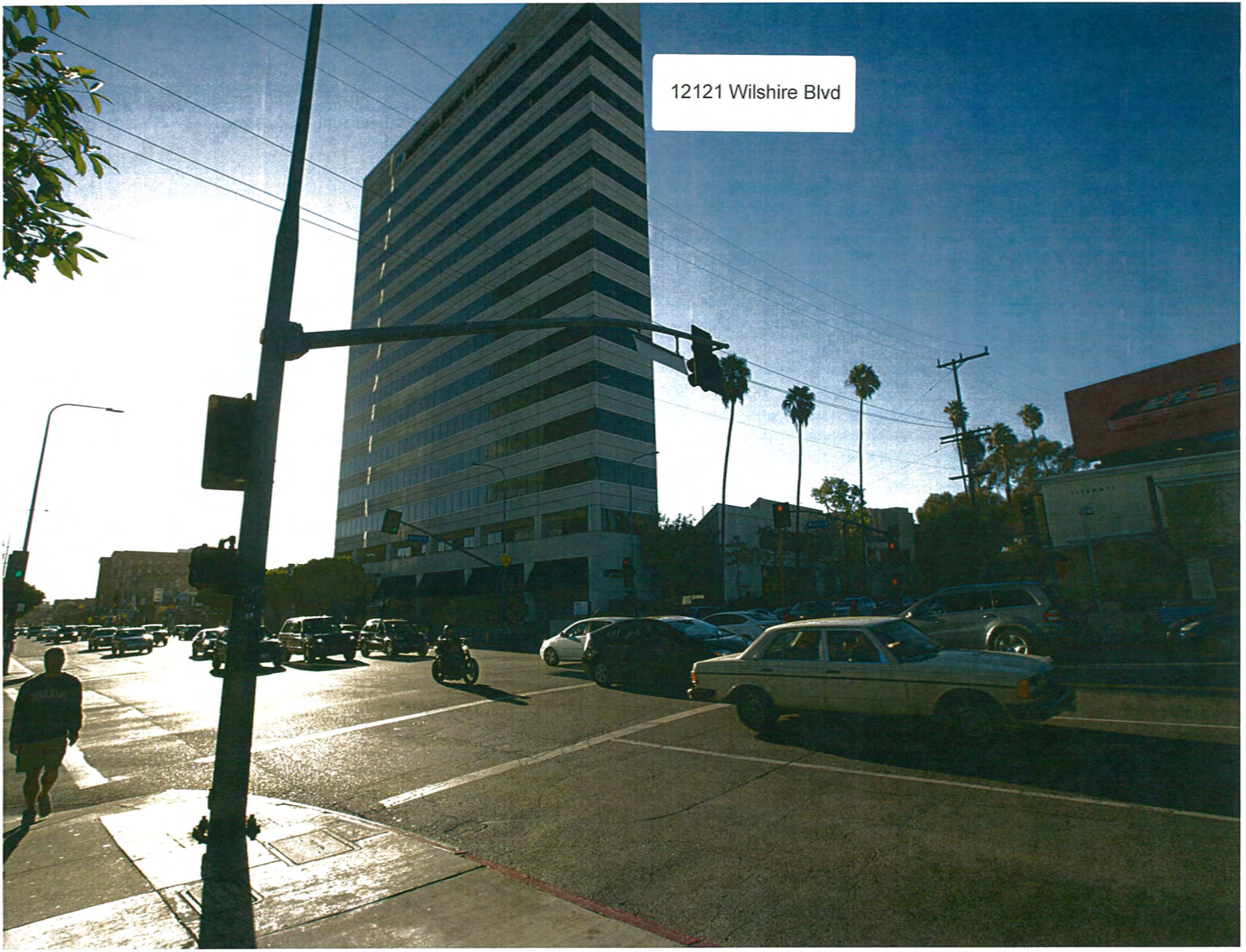
11818 Wilshire
11859 Wilshire
11952 Wilshire
11766 Wilshire
11755 Wilshire
Base map
11755 Wilshire
11766 Wilshire
11818 Wilshire
11859 Wilshire
11952 Wilshire
Wilshire Motel
Picasso Brentwood Site
12026 Wilshire
12121 Wilshire
12100 Wilshire
Wilshire Blvd
Kiowa Ave
Goshen Ave
Mayfield Ave
Darlington Ave
S Westgate Ave
S Barrington Ave
Granville Ave
Barry Ave
Federal Ave
Texas Ave
Armacost Ave
Brockton Ave
S Bundy Dr
S Saltair Ave
Gretna Green Way
Amherst Ave
Wellesley Ave
Rochester Ave
Stoner Ave
Ohio Ave
Brentwood Place Shopping Center
Bandera
Yen Sushi & Sake Bar
Q's Billiard Club & Restaurant
Scott J. Corwin, A Professional Law Corporation
Pearlstein Glen R MD
Dr. Sophia S. Updike DDS
Ross Dress For Less
Dr Vita's Italian
Fatburger
Top La Limo
University High School
Tenth Church-Christ Scientist
Ralph's
Literati Cafe
Dr. Peter Pham DDS
Brockton Avenue School
Santa Monica Water Treatment
Dr. Michael Kobel PhD, MFT, DAPA
Piano Lessons in West Los Angeles
West Wilshire Medical Surgical Griffiths Chester F MD
Joe's Gym
Nikaeen Orthodontics
Jessica Wu, MD
Churchill Management Group
Westland Development Group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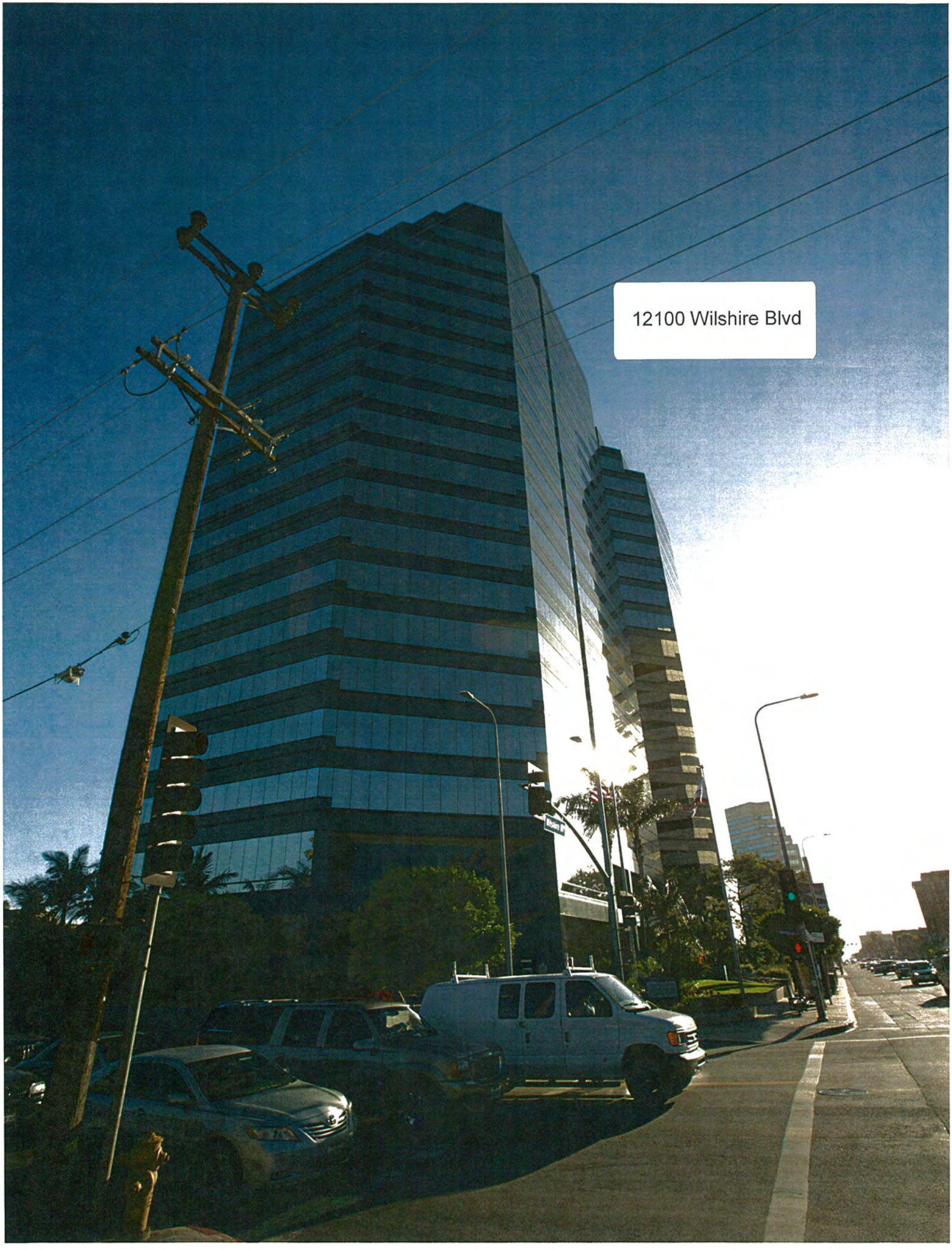
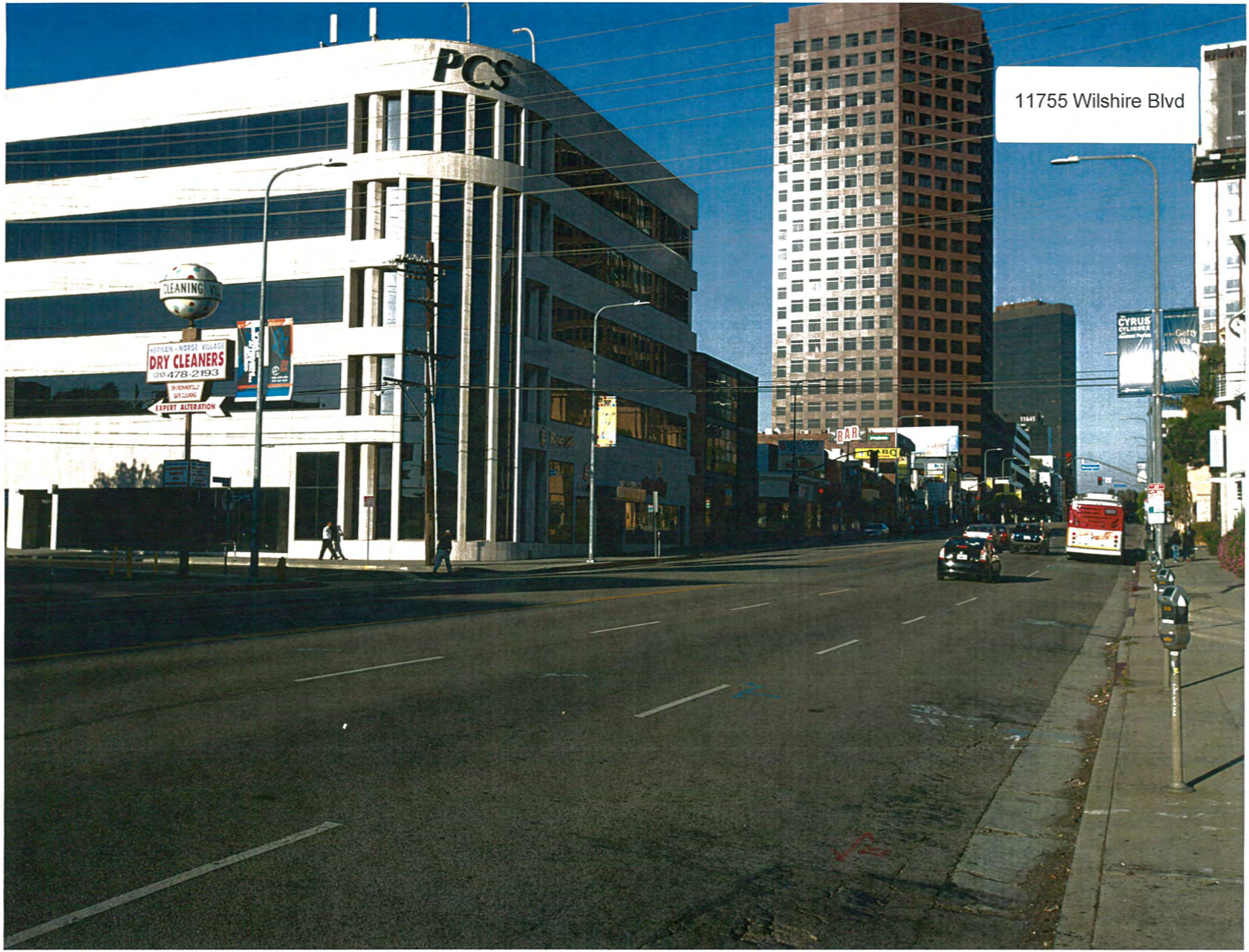

12100 Wilshire Blvd


12026 Wilshire Blvd
pageplus wireless
Authorized Retailer
CLEAR
REPAIR CENTER
T-Mobile


11859 Wilshire Blvd
DRY CLEANERS
(310) 478-2193
ENVIRONMENTALLY SAFE CLEANING
LAUNDRY SHIRTS ON PREMISES
2013 2014
cap.ucla.edu
310 825 2101


11952 Wilshire Blvd
FIDELITY
MORTGAGE LENDERS, INC.
SPARKY'S
PET GROOMING SALON
NIKY'S SPORTS
NAILS
Pay to Park


11766 Wilshire Blvd
LIFE-CARE
MEDICAL SUPPLIES
Ph: 310-479-0094
PAPA JOHNS
Westgate
11818 Wilshire Blvd


11755 Wilshire Blvd
PCS
DRY CLEANERS
478-2193
EXPERT ALTERATION
BAR

Attachment B

Air Quality Worksheets

Step 1. Determine Allowable Increase using 98th percentile NO2 and Max NO2 data

NW Coastal NO2 Monitoring Data

Stn #	City	AQMD Design Value 98th % 2008-2010		Threshold (ppb)	Allowable Increase (ppb)	ug/m3
91	CELA	61		100	39	73

Stn #	City	Design Value 2006-2008	Max Hourly, ppb 2007	2008	2009	2010	Threshold (ppb)	Allowable Increase (ppb)	
91	CELA	90	80	90	70	89	180	90	169.2

Max Hourly vs. 98th Percentile Ratio (Allowable Increase)	43%

Step 2. Use ratio in Step 1 to determine LST lookup value. Extrapolate/Interpolate LST look-up value for project area

LST Threshold (SRA 1, 25 meter receptor)

Project Size (acres)	NO2 (lbs/day)	98th Percentile NO2 (lbs/day)	CO (lbs/day)	PM10 (lbs/day)	PM2.5 (lbs/day)
1	103	44	562	4	3

Picasso Construction

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking Structure	126.00	Space	0.20	50,400.00	0
Apartments Mid Rise	81.00	Dwelling Unit	0.30	81,000.00	232
Strip Mall	7.75	1000sqft	0.18	7,745.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2015
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Site Specific

Construction Phase - Site Specific

Off-road Equipment -

Off-road Equipment - Site Specific

Off-road Equipment - Site Specific

Off-road Equipment - Site Specific

Off-road Equipment - Site Specific

Off-road Equipment - Site Specific

Trips and VMT - Site Specific

Demolition -

Grading - Site Specific

Construction Off-road Equipment Mitigation -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	5.00	67.00
tblConstructionPhase	NumDays	100.00	217.00
tblConstructionPhase	NumDays	2.00	22.00
tblConstructionPhase	NumDays	5.00	12.00
tblConstructionPhase	PhaseEndDate	3/19/2015	12/16/2014
tblConstructionPhase	PhaseEndDate	2/14/2014	2/15/2014
tblConstructionPhase	PhaseEndDate	1/1/2015	12/16/2014
tblConstructionPhase	PhaseStartDate	12/17/2014	9/14/2014
tblConstructionPhase	PhaseStartDate	12/17/2014	12/1/2014
tblGrading	AcresOfGrading	0.00	0.50
tblGrading	AcresOfGrading	0.00	0.50
tblGrading	MaterialExported	0.00	9,000.00
tblLandUse	LotAcreage	1.13	0.20
tblLandUse	LotAcreage	2.13	0.30

tblOffRoadEquipment	LoadFactor	0.36	0.36
tblOffRoadEquipment	OffRoadEquipmentType		Air Compressors
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Bore/Drill Rigs
tblOffRoadEquipment	OffRoadEquipmentType		Cement and Mortar Mixers
tblOffRoadEquipment	OffRoadEquipmentType		Air Compressors
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Plate Compactors
tblOffRoadEquipment	OffRoadEquipmentType		Welders
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	8.00	4.00
tblOffRoadEquipment	UsageHours	4.00	6.00
tblOffRoadEquipment	UsageHours	7.00	0.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblProjectCharacteristics	OperationalYear	2014	2015
tblTripsAndVMT	HaulingTripNumber	0.00	70.00
tblTripsAndVMT	HaulingTripNumber	1,125.00	1,320.00
tblTripsAndVMT	VendorTripNumber	18.00	25.00
tblTripsAndVMT	VendorTripNumber	0.00	5.00
tblTripsAndVMT	WorkerTripNumber	10.00	15.00
tblTripsAndVMT	WorkerTripNumber	82.00	100.00
tblTripsAndVMT	WorkerTripNumber	16.00	0.00
tblTripsAndVMT	WorkerTripNumber	8.00	15.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e

Year	lb/day										lb/day					
2014	35.3369	44.4202	36.5820	0.0702	1.4724	2.6728	4.1452	0.3941	2.5664	2.9605						7,281.3067
Total	**35.3369**	**44.4202**	**36.5820**	**0.0702**	**1.4724**	**2.6728**	**4.1452**	**0.3941**	**2.5664**	**2.9605**						**7,281.3067**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2014	35.3369	44.4202	36.5820	0.0702	1.4724	2.6728	4.1452	0.3941	2.5664	2.9605						7,281.3067
Total	**35.3369**	**44.4202**	**36.5820**	**0.0702**	**1.4724**	**2.6728**	**4.1452**	**0.3941**	**2.5664**	**2.9605**						**7,281.3067**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2014	1/14/2014	5	10	
2	Site Preparation	Site Preparation	1/15/2014	1/15/2014	5	1	
3	Grading	Grading	1/16/2014	2/15/2014	5	22	
4	Building Construction	Building Construction	2/16/2014	12/16/2014	5	217	
5	Architectural Coating	Architectural Coating	9/14/2014	12/16/2014	5	67	
6	Paving	Paving	12/1/2014	12/16/2014	5	12	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0.5

Acres of Paving: 0

Residential Indoor: 164,025; Residential Outdoor: 54,675; Non-Residential Indoor: 87,218; Non-Residential Outdoor: 29,073 (Architectural

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Air Compressors	1	8.00	78	0.48
Demolition	Concrete/Industrial Saws	1	4.00	81	0.73
Demolition	Rubber Tired Dozers	0	1.00	255	0.40
Demolition	Rubber Tired Loaders	1	8.00	199	0.36
Demolition	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Site Preparation	Graders	0	8.00	174	0.41
Site Preparation	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Grading	Excavators	1	8.00	162	0.38
Grading	Concrete/Industrial Saws	0	8.00	81	0.73
Grading	Rubber Tired Loaders	1	8.00	199	0.36
Grading	Rubber Tired Dozers	0	1.00	255	0.40
Grading	Bore/Drill Rigs	1	8.00	205	0.50

Grading	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Building Construction	Cement and Mortar Mixers	1	6.00	9	0.56
Building Construction	Air Compressors	1	6.00	78	0.48
Building Construction	Aerial Lifts	1	8.00	62	0.31
Building Construction	Plate Compactors	1	6.00	8	0.43
Building Construction	Cranes	1	6.00	226	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Welders	1	8.00	46	0.45
Building Construction	Pumps	1	6.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Paving	Pumps	1	6.00	84	0.74
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	0	0.00	9	0.56
Paving	Cement and Mortar Mixers	0	0.00	9	0.56
Paving	Pavers	0	0.00	125	0.42
Paving	Rollers	1	6.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	70.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	0	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	15.00	0.00	1,320.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	100.00	25.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	0.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	3	15.00	5.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 2014

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					1.4800e-003	0.0000	1.4800e-003	2.2000e-004	0.0000	2.2000e-004						0.0000
Off-Road	1.7782	16.0214	8.1817	0.0156		0.9870	0.9870		0.9514	0.9514						1,580.3133
Total	**1.7782**	**16.0214**	**8.1817**	**0.0156**	**1.4800e-003**	**0.9870**	**0.9885**	**2.2000e-004**	**0.9514**	**0.9516**						**1,580.3133**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1701	2.6135	1.8794	5.2300e-003	0.1219	0.0474	0.1693	0.0334	0.0436	0.0770						537.9369
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000

Worker	0.0572	0.0763	0.7992	1.3700e-003	0.1118	1.2000e-003	0.1130	0.0296	1.0900e-003	0.0307						123.8758
Total	**0.2273**	**2.6899**	**2.6786**	**6.6000e-003**	**0.2336**	**0.0486**	**0.2822**	**0.0630**	**0.0447**	**0.1077**						**661.8127**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.8000e-004	0.0000	5.8000e-004	9.0000e-005	0.0000	9.0000e-005						0.0000
Off-Road	1.7782	16.0214	8.1817	0.0156		0.9870	0.9870		0.9514	0.9514						1,580.3133
Total	**1.7782**	**16.0214**	**8.1817**	**0.0156**	**5.8000e-004**	**0.9870**	**0.9876**	**9.0000e-005**	**0.9514**	**0.9515**						**1,580.3133**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1701	2.6135	1.8794	5.2300e-003	0.1219	0.0474	0.1693	0.0334	0.0436	0.0770						537.9369
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Worker	0.0572	0.0763	0.7992	1.3700e-003	0.1118	1.2000e-003	0.1130	0.0296	1.0900e-003	0.0307						123.8758
Total	**0.2273**	**2.6899**	**2.6786**	**6.6000e-003**	**0.2336**	**0.0486**	**0.2822**	**0.0630**	**0.0447**	**0.1077**						**661.8127**

3.3 Site Preparation - 2014

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.5303	0.0000	0.5303	0.0573	0.0000	0.0573						0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.5303**	**0.0000**	**0.5303**	**0.0573**	**0.0000**	**0.0573**						**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**						**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.2068	0.0000	0.2068	0.0223	0.0000	0.0223						0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.2068**	**0.0000**	**0.2068**	**0.0223**	**0.0000**	**0.0223**						**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**						**0.0000**

3.4 Grading - 2014

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0704	0.0000	0.0704	9.6100e-003	0.0000	9.6100e-003						0.0000
Off-Road	1.6985	21.9040	9.8475	0.0233		0.9517	0.9517		0.8756	0.8756						2,483.5206
Total	**1.6985**	**21.9040**	**9.8475**	**0.0233**	**0.0704**	**0.9517**	**1.0221**	**9.6100e-003**	**0.8756**	**0.8852**						**2,483.5206**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.4578	22.4018	16.1088	0.0449	1.0445	0.4062	1.4508	0.2860	0.3736	0.6596						4,610.8877
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Worker	0.0858	0.1145	1.1988	2.0600e-003	0.1677	1.8000e-003	0.1695	0.0445	1.6400e-003	0.0461						185.8136
Total	**1.5437**	**22.5162**	**17.3076**	**0.0469**	**1.2122**	**0.4080**	**1.6202**	**0.3304**	**0.3753**	**0.7057**						**4,796.7014**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0274	0.0000	0.0274	3.7500e-003	0.0000	3.7500e-003						0.0000
Off-Road	1.6985	21.9040	9.8475	0.0233		0.9517	0.9517		0.8756	0.8756						2,483.5206

Total	**1.6985**	**21.9040**	**9.8475**	**0.0233**	**0.0274**	**0.9517**	**0.9791**	**3.7500e-003**	**0.8756**	**0.8793**						**2,483.5206**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.4578	22.4018	16.1088	0.0449	1.0445	0.4062	1.4508	0.2860	0.3736	0.6596						4,610.8877
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Worker	0.0858	0.1145	1.1988	2.0600e-003	0.1677	1.8000e-003	0.1695	0.0445	1.6400e-003	0.0461						185.8136
Total	**1.5437**	**22.5162**	**17.3076**	**0.0469**	**1.2122**	**0.4080**	**1.6202**	**0.3304**	**0.3753**	**0.7057**						**4,796.7014**

3.5 Building Construction - 2014

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.0288	22.5829	14.1969	0.0215		1.5478	1.5478		1.4854	1.4854						2,106.6106
Total	**3.0288**	**22.5829**	**14.1969**	**0.0215**		**1.5478**	**1.5478**		**1.4854**	**1.4854**						**2,106.6106**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Vendor	0.3084	2.9026	3.6408	5.4700e-003	0.1558	0.0549	0.2107	0.0443	0.0505	0.0948						558.2633
Worker	0.5723	0.7632	7.9921	0.0137	1.1178	0.0120	1.1297	0.2964	0.0109	0.3074						1,238.7576
Total	**0.8807**	**3.6658**	**11.6329**	**0.0192**	**1.2736**	**0.0669**	**1.3404**	**0.3408**	**0.0614**	**0.4022**						**1,797.0208**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.0288	22.5829	14.1969	0.0215		1.5478	1.5478		1.4854	1.4854						2,106.6106
Total	**3.0288**	**22.5829**	**14.1969**	**0.0215**		**1.5478**	**1.5478**		**1.4854**	**1.4854**						**2,106.6106**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000

Vendor	0.3084	2.9026	3.6408	5.4700e-003	0.1558	0.0549	0.2107	0.0443	0.0505	0.0948						558.2633
Worker	0.5723	0.7632	7.9921	0.0137	1.1178	0.0120	1.1297	0.2964	0.0109	0.3074						1,238.7576
Total	**0.8807**	**3.6658**	**11.6329**	**0.0192**	**1.2736**	**0.0669**	**1.3404**	**0.3408**	**0.0614**	**0.4022**						**1,797.0208**

3.6 Architectural Coating - 2014

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	29.5682					0.0000	0.0000		0.0000	0.0000						0.0000
Off-Road	0.4462	2.7773	1.9216	2.9700e-003		0.2452	0.2452		0.2452	0.2452						282.2905
Total	**30.0144**	**2.7773**	**1.9216**	**2.9700e-003**		**0.2452**	**0.2452**		**0.2452**	**0.2452**						**282.2905**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**						**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	29.5682					0.0000	0.0000		0.0000	0.0000						0.0000
Off-Road	0.4462	2.7773	1.9216	2.9700e-003		0.2452	0.2452		0.2452	0.2452						282.2905
Total	**30.0144**	**2.7773**	**1.9216**	**2.9700e-003**		**0.2452**	**0.2452**		**0.2452**	**0.2452**						**282.2905**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**						**0.0000**

3.7 Paving - 2014

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2655	10.3993	6.9037	0.0100		0.8002	0.8002		0.7627	0.7627						1,011.4631
Paving	0.0000					0.0000	0.0000		0.0000	0.0000						0.0000
Total	**1.2655**	**10.3993**	**6.9037**	**0.0100**		**0.8002**	**0.8002**		**0.7627**	**0.7627**						**1,011.4631**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Vendor	0.0617	0.5805	0.7282	1.0900e-003	0.0312	0.0110	0.0421	8.8600e-003	0.0101	0.0190						111.6527
Worker	0.0858	0.1145	1.1988	2.0600e-003	0.1677	1.8000e-003	0.1695	0.0445	1.6400e-003	0.0461						185.8136
Total	**0.1475**	**0.6950**	**1.9270**	**3.1500e-003**	**0.1988**	**0.0128**	**0.2116**	**0.0533**	**0.0117**	**0.0651**						**297.4663**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2655	10.3993	6.9037	0.0100		0.8002	0.8002		0.7627	0.7627						1,011.4631
Paving	0.0000					0.0000	0.0000		0.0000	0.0000						0.0000
Total	**1.2655**	**10.3993**	**6.9037**	**0.0100**		**0.8002**	**0.8002**		**0.7627**	**0.7627**						**1,011.4631**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000						0.0000
Vendor	0.0617	0.5805	0.7282	1.0900e-003	0.0312	0.0110	0.0421	8.8600e-003	0.0101	0.0190						111.6527
Worker	0.0858	0.1145	1.1988	2.0600e-003	0.1677	1.8000e-003	0.1695	0.0445	1.6400e-003	0.0461						185.8136
Total	**0.1475**	**0.6950**	**1.9270**	**3.1500e-003**	**0.1988**	**0.0128**	**0.2116**	**0.0533**	**0.0117**	**0.0651**						**297.4663**

Attachment C

Groundwater Borings Memorandum

VAN TILBURG, BANVARD & SODERBERGH, AIA
ARCHITECTURE · PLANNING · INTERIORS · URBAN DESIGN
SANTA MONICA · DENVER · SAN JOSE

November 6, 2013

Picasso Brentwood Mixed Use
Water Table

The water levels were found in 3 Borings and are as follows:
(See enclosed diagram for Boring Locations)

Boring B1:
Water encountered at elev 245.5'.

Current Design with a Matt Foundation of 2'-6" thick.
Top of Slab at elev 251.0'
Bottom Foundation at elev 247.5'
2'-0" above Water Table

Boring B2:
Water encountered at elev 245.5'.

Current Design with a Matt Foundation of 2'-6" thick
Top of slab at elev 251.0'
Bottom Foundation at elev 247.5'
2'-0" above the Water Table

Boring B3:
Water encountered at elev 243.5'.

Current Design with a Matt Foundation of 2'-6" thick
Top slab at elev 247.4'
Bottom Foundation at elev 244.9'
1'-4" above the Water Table

As such, there is a dimension from 1'-4" to 2'-0" between the ground water and the bottom of our Matt Foundation.

Johannes Van Tilburg, FAIA
Principal
Van Tilburg, Banvard & Soderbergh, AIA
California Architectural License #C6457

NOV 6 | 13
Date

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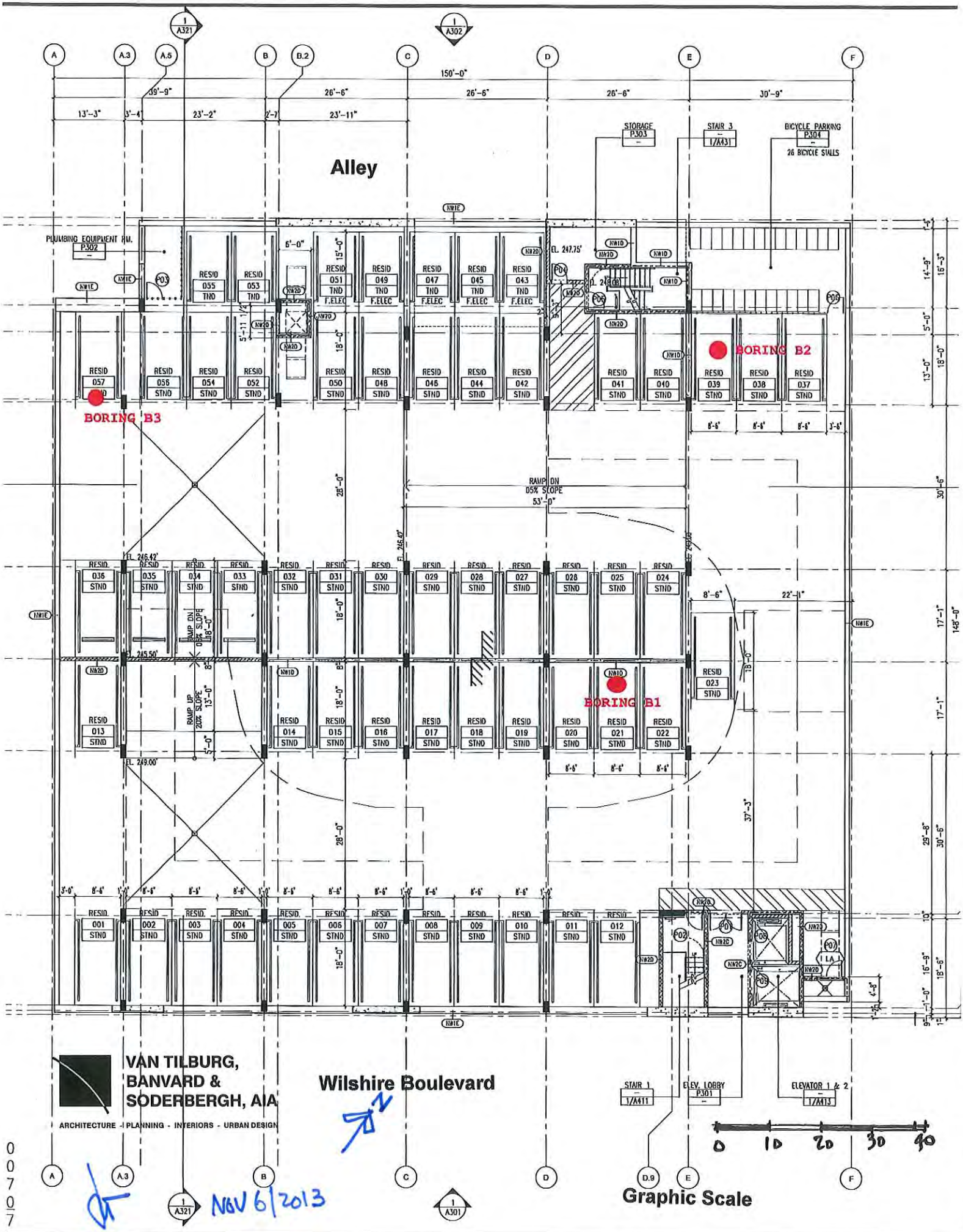

Alley
BORING B1
BORING B2
BORING B3
Wilshire Boulevard
VAN TILBURG, BANVARD & SODERBERGH, AIA
ARCHITECTURE - PLANNING - INTERIORS - URBAN DESIGN
Graphic Scale
0 10 20 30 40
NOV 6 2013
00707

ATTACHMENT "C"

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

June 10, 2014

Mr. John Warfel
Metropolitan Pacific Real Estate Group
201 Santa Monica Boulevard, Suite 640
Santa Monica, California 90401

RE: Review and Response to GE RealProp, LP Appeal of Mitigated Negative Declaration for Picasso Brentwood Project Located at 12029 – 12035 Wilshire Boulevard in the Brentwood Community of the City of Los Angeles (ENV-2012-2837-MND)

Dear Mr. Warfel,

Per the request of Mr. Damon Mamalakis of Armbruster Goldsmith & Delvac LLP, we have reviewed the appeal filed by Mr. Robert Silverstein on behalf of GE RealProp, LP regarding the City of Los Angeles' approval earlier this year of the Mitigated Negative Declaration ("MND") prepared for the Picasso Brentwood mixed-use project ("Proposed Project" or "Project") at 12029 – 12035 Wilshire Boulevard, in the Brentwood community of the City of Los Angeles (ENV-2012-2837-MND, Planning Department Case No. DIR-2012-2836-DB-SPR-CDO). Our firm prepared the traffic impact analysis study for the Proposed Project (dated "August 2012"), which was reviewed and approved without revision by the City of Los Angeles Department of Transportation ("LADOT") in their assessment letter issued on October 16, 2012.

The appeal of the Project's MND identified several issues of concern regarding the traffic analyses associated with the proposed project, although our review focused only on a number of general traffic-related comments contained in the current Silverstein appeal letter dated February 4, 2014, and on more specific issues identified in a supplemental letter prepared by Mr. Herman Basmaciyan, P.E. (dated November 15, 2013, and attached to an earlier Silverstein appeal letter dated November 21, 2013), who was retained by the appellant to peer review our firm's traffic study for the proposed project. A copy of Mr. Basmaciyan's comments is provided in Attachment 1 of this document for reference; please note that the naming convention for our responses mirrors that of Mr. Basmaciyan's original comments.

Responses to Appeal Comments

<u>Responses to Silverstein (2/4/2014) Comment 4 (page 3 of appeal):</u>

The first two paragraphs of this comment summarize in general terms the appellant's concerns regarding vehicular access to and from the proposed project, including issues regarding use of the existing east/west alley located along the north side of the project site, and the potential for pedestrian conflicts within the existing Ralph's supermarket parking lot just to the west of the

project site, as well as possible project-related impacts to the currently unsignalized intersection of Westgate Avenue and Wilshire Boulevard to the east of the site. These issues are described in more detail in Mr. Basmaciyan's technical review of the project traffic study (specifically, Comment "G" and Comment "E", respectively), and detailed responses to these comments are provided later in this document, and therefore, are not addressed in this response.

Mr. Silverstein also notes that, subsequent to the original approval of the proposed project's traffic study by LADOT on October 16, 2012, LADOT and Caltrans have reached an agreement related to the evaluation of potential project-related traffic impacts on the area freeway system. The proposed Picasso Brentwood project traffic study utilized the Los Angeles County Congestion Management Program ("CMP") procedures, which were applicable at the time the study was prepared and reviewed, to evaluate the potential impacts of the project on the surrounding freeway system, which require a detailed analysis of the potential for impacts on any freeway mainline segments where a project could reasonably be anticipated to result in an increase in peak hour traffic in either direction of the freeway by 150 or more vehicles per hour. Based on the worst-case "four-parcel" project analyzed in that study (which is larger and generates more traffic than the currently-proposed "MND" "three-parcel" project, as described in more detail in the following responses to Mr. Basmaciyan's Comment "A"), it was determined that the project's incremental trip additions to any of the area freeway mainline segments will be well below the 150-trip thresholds, and as such, would not produce any measurable effects on the area freeways. Therefore, no further freeway impact analysis was warranted.

However, the new LADOT/Caltrans agreement supplements the CMP's freeway mainline impact analysis procedures with additional, and somewhat more sensitive, evaluation requirements and thresholds. These new procedures require that a detailed freeway mainline impact analysis be prepared if a project is expected to increase the peak hour directional traffic volume-to-capacity ratio ("V/C") on a particular freeway segment by one percent (0.010) or more when that segment is operating at LOS E or F, or by two percent (0.020) or more at LOS D, based on as assumed capacity of 2,000 vehicles per hour per lane or "mainline" travel lanes, including high-occupancy vehicle ("HOV", or carpool, lanes). Requirements for the preparation of detailed impact analyses for freeway on- and off-ramps are also identified in the agreement, with impact thresholds similar to those noted above for the freeway mainline evaluations (one percent increase at LOS E or F, two percent increase at LOS D, assuming freeway ramp capacities of 1,500 vehicles per hour per lane), although such ramp impact analyses are generally assumed to be contingent on whether freeway mainline impacts would occur (detailed ramp impact analyses are typically not required if no mainline impacts are identified).

The nearest freeway to the site of the proposed project is the San Diego (I-405) Freeway, which currently provides a minimum of four mainline lanes and one HOV lane in each direction (plus additional lanes at freeway on- and off-ramp ramps) through the study area, equating to a minimum freeway mainline capacity in each direction of approximately 10,000 vehicles per hour.

It is acknowledged, based on anecdotal observations and without specific analyses, that the San Diego Freeway through the study area currently exhibits LOS E of LOS F operations throughout much of the day, including the critical AM and PM peak hours relevant to both the CMP and new LADOT/Caltrans analysis methodologies. Therefore, the baseline conditions relative to the need for a detailed traffic impact analysis of the proposed Picasso Brentwood MND project apply. However, based on the criteria identified in the new agreement, in order to produce the minimum one-percent increase in the freeway mainline V/C ratio in either direction that would be identified as a "significant" impact, the proposed project would need to increase the peak hour directional traffic on the freeway mainlines by a minimum of 100 vehicles per hour (10,000 vehicles per hour directional freeway mainline capacity x .01 impact threshold = 100).

As described in detail in the response to Mr. Basmaciyan's Comment "A" (provided later in this document), and shown in Attachment 2 to this letter, the proposed MND project is expected to generate fewer trips than the originally-analyzed and somewhat larger "four-parcel" project, with an anticipated total net trip generation of approximately 19 trips (reduction of 10 inbound, increase of 29 outbound) during the AM peak hour, and of approximately 20 trips (increase of 26 inbound, reduction of six outbound) during the PM peak hour. Further, as shown in Figure 4 of the approved (August 2012) project traffic study, approximately 30 percent of the traffic associated with the proposed project is expected to travel east or west along Wilshire Boulevard to or from the project site. Although not specifically identified in the traffic study, it is assumed that, of this total of 30 percent, approximately one-third (approximately 10 percent) would travel along the San Diego Freeway to or from the north of Wilshire Boulevard (entering or exiting the freeway at Wilshire Boulevard to access the project site), while a similar amount (10 percent) is anticipated to utilize the San Diego Freeway to or from the south of Wilshire Boulevard.

Therefore, the maximum net project-related traffic additions to any of the San Diego Freeway mainline segments in the study area are expected to be approximately three vehicles per hour, in both northbound direction on the segment north of Wilshire Boulevard, and in the southbound direction on the segment south of Wilshire Boulevard, during the AM peak hour (maximum project-related net directional traffic of 29 outbound trips x 10 percent mainline utilization). This level of potential net project traffic results in a maximum incremental project-related increase in the San Diego Freeway mainline V/C ratio of approximately 0.0003 (maximum incremental volume of three vehicles per hour divided by directional capacity of 10,000 vehicles per hour), or only about three percent of the new LADOT/Caltrans impact analysis threshold of +0.010; incremental V/C mainline increases on other segments of the San Diego Freeway (or on other freeway segments or freeway facilities in the project vicinity) during the AM and PM peak hours will be less based on lower incremental project-related traffic additions, or on further dispersal of project-related traffic throughout the regional transportation network. Since the proposed MND project's maximum potential traffic additions or associated impacts to the mainline lanes of the San Diego Freeway will not meet the minimum thresholds identified in the recently adopted

LADOT/Caltrans freeway mainline impact analysis agreement (+.0003 vs. +0.010), no further freeway mainline impact analyses are warranted. Additionally, since the potential MND project traffic additions will also exhibit less-than-significant levels based on both the CMP and the new LADOT/Caltrans thresholds, no freeway mainline impacts are anticipated, and therefore, freeway-related traffic impact mitigation measures are not required. Additionally, because the proposed MND project will not create any significant impacts to the San Diego Freeway mainline facilities, no detailed impact analysis of the potential for project-related impacts to any of the freeway ramps utilized by project traffic are required.

Responses to Basmaciyan Traffic Study Review Comments

Response to Comment "A":

The traffic study prepared for the proposed project examines an "envelope" development consisting of a total of four parcels (12029 - 12041 Wilshire Boulevard), whereas the MND examined a "three-parcel" project (12029 - 12035 Wilshire Boulevard). This approach was used for the project traffic study, since the "four-parcel" project represents a "worst case" project that generates more net traffic (and thus, exhibits a higher potential for significant impacts) than the three-parcel project scheme ultimately chosen. However, although Mr. Basmaciyan is correct in pointing out that the westernmost driveway for the three-parcel project would not allow the north/south "through" move indicated in Figures 7(a) and 7(b), he is incorrect in his assertion that the elimination of the through move (to and from Goshen Avenue via the easternmost drive aisle of the Ralph's parking lot) would result in more traffic being directed down the alley in front of the Ralph's store. First, although project-related traffic would not be able to directly enter and exit the three-parcel project's western driveway directly from or to the north as shown in these figures, and since no changes to the currently-utilized site access routes along the alley in front of Ralph's as well as from Gohsen Avenue are anticipated (or are proposed by the project), it is anticipated that project-related vehicles will continue to access the project site in this manner, and therefore, the relocation of the western project driveway farther to the east would not change the overall trip distributions for the project.

Additionally, as discussed earlier in this response and shown in Attachment 2 to this document, the three-parcel project actually generates fewer trips than the four-parcel project analyzed in the traffic study. As described in the August 2012 traffic study, the four-parcel project will result in a total of approximately 789 net trips per day, including 30 net trips during the AM peak hour, and 36 net trips during the PM peak hour. However, the smaller three-parcel project will result in a net increase of only 545 net daily trips, including 19 net trips during the AM peak hour, and 20 net trips during the PM peak hour, or 244 fewer daily trips, 11 fewer AM peak hour trips, and 16 fewer PM peak hour trips than were analyzed in the August 2012 project traffic study. Therefore, despite the relocation of the project's western driveway slightly farther to the east, as shown in Figures A-1(a) and A-1(b) in Attachment 2, the number of net new three-parcel

project-related trips expected to use the alley in front of the Ralph's store would be substantially reduced compared to the four-parcel project, from a total of nine net trips (14 westbound, reduction of five eastbound) to five net trips (10 westbound, reduction of five eastbound) during the AM peak hour, and from 23 net trips (zero westbound, 23 eastbound) to 13 net trips (reduction of two westbound, 15 eastbound) in the PM peak hour. These reduced levels of traffic associated with the three-parcel (MND) project will result, on average, in one net new trip in the alley in front of the Ralph's' store every 12 minutes during the AM peak hour and about every 4½ minutes during the PM peak hour. These nominal traffic additions will not be expected to result in any significant impacts to the operations of the alley, the Ralph's store, or to pedestrian safety in the alley or adjacent Ralph's parking lot.

Response to Comment "B":

The commenter notes that the project site is served by sufficient public transit to warrant the application of the 15 percent transit reduction identified in the project traffic study, but indicates that other conditions associated with the assumed transit reduction are not addressed, including provisions to provide "wider than standard sidewalks", improvements to the conditions or aesthetics of any sidewalks leading to the subject transit stop or station, including providing adequate lighting, providing continuous paved sidewalks with adequate lighting between the project site and the transit stop, and improvements/beautification to transit shelters. However, the commenter fails to disclose that the proposed project is an infill project located in the middle of the block between Bundy Drive and Westgate Avenue, and as a result, the provision of "wider than standard sidewalks" along the project frontage would not continue beyond the project site in either direction, making any such widenings ineffective in the larger sense and rendering this comment a moot point. Additionally, the project will be required to repair or replace any substandard sidewalk conditions that either currently exist or may result from its construction. Since the existing sidewalks along the project frontage connect with existing sidewalks continuing throughout the area along the north side of Wilshire Boulevard, the project will provide the required continuous paved sidewalk between the project site and the nearest transit (bus) stop, at the northwest corner of the intersection of Wilshire Boulevard and Bundy Drive (approximately 380 feet west of the project site). Standard street lighting along this section of Wilshire Boulevard also currently exists, and as such, the requirement to provide adequate lighting for pedestrians is also already provided. Further, although the bus stop at the northwest corner of Wilshire Boulevard and Bundy Drive does not currently exhibit any type of "shelter", the existing bench seats are relatively new and in good condition, and upgrades or other improvements to this facility are not warranted. Finally, it is of note that LADOT approved the 15 percent transit utilization reduction in the required Memorandum of Understanding ("MOU") prepared prior to initiation of the formal traffic study, and that LADOT's subsequent approval of the project's August 2012 traffic study reiterated this fact, finding that the assumed 15 percent transit utilization reduction was applicable and appropriate to the proposed project.

Response to Comment "C":

The commenter correctly identifies that the August 2012 traffic study includes trip "credits" for the removal of the existing development at 12041 Wilshire Boulevard. However, he fails to recognize that the elimination of this parcel from the proposed project (for the project described in the MND) also results in a substantially smaller project. As described in the August 2012 project traffic study, the four-parcel project (including the 12041 Wilshire Boulevard parcel) anticipated a development containing a total of 108 apartment units and 13,000 square feet of retail space, whereas the smaller three-parcel (MND) project contains only 81 apartment units and 7,745 square feet of retail space. Therefore, the inclusion of the 12041 Wilshire Boulevard parcel is appropriate for analyzing the potential traffic generation and associated impacts of the "worst case" four-parcel project, and its trip estimates and potential impacts are not understated. The three-parcel project reflects a development with approximately 25 percent fewer apartments and approximately 40 percent less retail area than the four-parcel project, and as shown in the attachments, even without the trip credits associated with the 12041 Wilshire Boulevard parcel, the three-parcel project still generates approximately 31 percent fewer daily trips, 35 percent fewer AM peak hour trips, and 44 percent fewer PM peak hour trips than the originally-analyzed four-parcel project. As a result, the potential impacts of the project identified in the MND are adequately analyzed (and are, in fact, overstated) in the August 2012 traffic study.

Response to Comment "D":

The commenter suggests that the standard lane and/or intersection capacities used in the Critical Movement Analysis ("CMA") calculations for the intersection of Wilshire Boulevard and Bundy Drive should be reduced in order to account for potential (but intermittent) blockages of the eastbound and westbound curb lanes on Wilshire Boulevard by buses stopped at the existing bus stops on these approaches to Bundy Drive, or to adjust for pedestrian traffic crossing either the north or south legs of Bundy Drive, which could delay vehicles wishing to turn right from these lanes, thereby slowing other "through" traffic using the curb lanes. However, the commenter does not indicate that the typical lane and/or intersection capacities used in the CMA methodologies are highly conservative, and already intrinsically include adjustments to approximate intersection delays caused multiple signal phases (such as at Wilshire Boulevard and Bundy Drive), pedestrian activity, or by curb lane "side friction" or other intermittent blockages or vehicular slowing. These factors are used to adjust the typical "baseline" lane capacities identified in the current Highway Capacity Manual ("HCM")[1] from approximately 1,800 vehicles per hour (per lane) to the 1,500 vehicles per hour (per lane) used in the project traffic study's CMA calculations, which is approximately the reduction percentage (16.7 percent) suggested by the commenter. The commenter further assumes that all of the bus-related lane blockages (bus stops) will occur during the east/west "green" signal phase,

[1] Highway Capacity Manual, Transportation Research Board, Washington, D.C., 2000.

thereby affecting the amount of traffic that could travel in the curb lanes, when in reality, a portion of the bus loading and unloading activity would occur during the "red" signal phase for Wilshire Boulevard traffic, which would not affect or reduce the capacity of the curb lane specifically or of the overall intersection. Therefore, the analyses contained in the August 2012 traffic study utilize conservative and widely-recognized procedures and assumptions, and does not require adjustment. Further, it is also important to note that a review of Table 9 (page 62) of the August 2012 traffic study indicates that the largest potential project-related impact to any of the study intersections is +0.009, at the intersection of Wilshire Boulevard and Bundy Drive during the PM peak hour, which is also already forecast to operate at LOS F during this time period. Therefore, since the maximum project-related impact is below the minimum level of significance at this intersection, which also exhibits the worst level of service condition (LOS F), reductions in the capacity of the intersection would not result in a higher identified level of service, and the project's impact would remain less-than-significant. Finally, it is also of note that, as described earlier in Response to Comment "A" and Response to Comment "C", the current three-parcel (MND) project results in approximately 44 percent fewer net trips during the PM peak hour than the four-parcel project analyzed in the August 2012 study, and therefore, project-related impacts at the intersection of Wilshire Boulevard and Bundy Drive and the other study intersections would be less than shown in Table 9, and therefore, no significant impacts would occur regardless of the levels of service at any of the study locations.

Response to Comment "E":

The commenter is correct that LADOT's current Traffic Study Policies and Procedures does not include "impact analysis" for unsignalized intersections, instead limiting the evaluation of traffic conditions at such locations to traffic signal warrant analyses, to determine whether the intersection currently exhibits or is anticipated to exhibit conditions where installation of a traffic signal would be appropriate. However, in Subcomment No. E.1, the commenter notes that southbound traffic on Bundy Drive creates vehicular queuing that can block westbound traffic attempting to exit the east/west alley and preventing access onto southbound Bundy Drive. The commenter does not acknowledge that this factor was considered in the traffic study prepared for the proposed project, and as shown in Figure 5 of the study, project-related left-turns out of the alley to southbound Bundy Drive were not assumed; vehicles leaving the project site wishing to travel south (of Wilshire Boulevard) on Bundy Drive were assumed to exit the north/south alley adjacent to the west side of Ralph's onto westbound Wilshire Boulevard, then turn left at the intersection onto southbound Bundy Drive, or were assumed to access Goshen Avenue to turn left directly onto southbound Bundy Drive. However, as also indicated in Figure 5, the traffic study assumed only 5 percent of the project's outbound traffic, or approximately one trip during the AM peak hour, and no trips during the PM peak hour, were assumed to attempt this move (as shown in the attachments to this document). As such, project-related traffic is not anticipated to exacerbate the existing conditions identified by the commenter.

Subcomment E.2 raises a similar issue, although also noting northbound vehicular queuing on Bundy Drive due to its four-way STOP sign controlled intersection at Mayfield Avenue, and that the project traffic study does not examine the potential impacts to the unsignalized intersection of Bundy Drive and Mayfield Avenue. Again, as shown in Figures A-1(a) and A-1(b) in Attachment 2, the proposed project is only expected to add two net new trips (three northbound, reduction of one southbound) during the AM peak hour, and three net new trips (all southbound) during the PM peak hour to this intersection. This nominal level of net new traffic would not result in significant impacts to this intersection during either peak hour, and as such, no specific analysis of this location was required by LADOT.

Subcomment E.3 raises the issue of potential unidentified significant impacts to the unsignalized (two-way STOP sign controlled) intersection of Wilshire Boulevard and the north leg (southbound approach) of Westgate Avenue. The commenter also notes that, although southbound right turns from Westgate Avenue to westbound Wilshire Boulevard are assumed in the traffic study, no southbound left-turns (to eastbound Wilshire Boulevard) are shown (again referencing traffic study Figure 5). The reason that no southbound left-turns were assumed to occur from Westgate Avenue onto eastbound Wilshire Boulevard is that such moves are quite difficult to make, particularly during the morning and afternoon/evening peak commute traffic periods, due to heavy traffic volumes and limited “gaps” in traffic flows on Wilshire Boulevard. Project-related traffic wishing to travel east on Wilshire Boulevard from the project site was assumed to either access eastbound Goshen Avenue directly from the project site, or to travel east in the alley to Westgate Avenue and then turn left to access eastbound Goshen Avenue; all such traffic would then continue east on Goshen Avenue to Barrington Avenue to access eastbound Wilshire Boulevard.

However, although no traffic signal warrant analyses were performed for the intersection of Wilshire Boulevard and Westgate Avenue, the installation of a new signal at this location is not advisable, for several reasons. First, this intersection is located approximately 180 feet west of the signalized intersection of Wilshire Boulevard and the south leg (northbound approach) of Westgate Avenue, and installation of a new signal at this location would likely not be approved by LADOT due to issues related to traffic progression for both directions of Wilshire Boulevard. Additionally, installation of a new signal at this intersection would allow the previously-discussed southbound left turn onto eastbound Wilshire Boulevard, which could encourage traffic currently southbound on Bundy Drive and destined for eastbound Wilshire Boulevard to instead divert away from the congested intersection of Wilshire Boulevard and Bundy Drive to cut-through the residential neighborhoods north of Wilshire Boulevard and east of Bundy Drive, resulting in potential secondary impacts within the neighborhood. Finally, it is again important to note that the magnitudes of any additional project-related traffic travelling through the subject intersection are nominal. As shown in Figures A-1(a) and A-1(b) in Attachment 2, the MND project is expected to result in a net reduction in traffic through this intersection during the AM peak hour (reduction of three westbound right-turns, reduction of one westbound through, and increase of

one southbound right-turn), with an increase of only 11 net trips (eight westbound right-turns, three westbound through, and zero southbound) during the PM peak hour. No significant traffic impacts would occur due to the addition of these levels of incremental project-related traffic.

Response to Comment "F":

The commenter is correct that the alley adjacent to the north side of the project site does not exhibit its full required 20-foot width in the area generally east of the Ralph's parking lot, including along the frontage of the proposed project. However, although cited, the referenced "Letter Report" (dated January 8, 1997) is not provided for review. Moreover, the quote from the Letter Report merely describes the "character" of the alley as an "…active commercial alley"; it does not support the commenter's assertion that there was "concern" regarding traffic activity or volumes in the alley at that time. Further, although the alley does not exhibit its full design width of 20 feet, as identified in the approved August 2012 traffic study, the half-alley adjacent to the project site, and for which the proposed project is responsible for improving, is fully dedicated and improved to its required 10-foot width, and the dedications required to improve the remaining portions of the alley to its full design width are beyond the control of the project. In any event, the commenter is incorrect in asserting that the project traffic study did not address the width of the alley, and issues associated with its use by project-related traffic are identified.

Response to Comment "G":

Subcomment G.1 is addressed previously in Response to Comment "A".

Subcomment G.2 is addressed previously in Responses to Comments "E" and "A".

Subcomment G.3 indicates the commenter's concerns regarding potentially deficient driveway widths (at their alley intersections) and parking and drive aisle configurations within the project's parking garage. The proposed project will be required to design and construct the project driveways and parking garage to the satisfaction of the appropriate agencies (LADOT, and Department of Building and Safety), and the commenter is merely speculating that there could be a potential on-site project parking deficiency.

Subcomment G.4 expresses concerns related to driver sight distances for vehicles entering the alley from the proposed project's driveways and/or vehicles travelling through the alley. LADOT and other appropriate City agencies (Department of Building and Safety) have reviewed the project's proposed driveway scheme and operations, and determined that no sight distance issues are present, and that the driveway locations and designs do not present any notable conditions that would result in significant impacts to vehicular or pedestrian safety.

Subcomments G.5 and G.6 identify concerns regarding potential impacts associated with the use of the alley for its intended use not only as an access facility for vehicles associated with existing development along the alley, but also for loading and delivery operations for those uses. While it is acknowledged that the alley exhibits a total width of between 15 and 17.5 feet

adjacent to and east of the project site, and that potential short-term blockages of the alley could occur as a result of stopped service vehicles, the proposed project is not anticipated to add a significant amount of such vehicles to the alley (See Response to Comments "A" and "C"). Additionally, the commenter does not disclose that there are two 15-minute loading zone parking spaces currently provided along the north side of Wilshire Boulevard near the eastern edge of the project site that can be used by larger vehicles. These on-street loading zone spaces are anticipated to be the preferred spaces used by delivery vehicles over the alley spaces, due primarily to their accessibility, and would not affect the operations of the alley.

Subcomment G.7 expresses a concern regarding Fire Department and other emergency vehicle access to the site via the east-west alley, and potential impacts that may occur due to increases in traffic in the alley due to the proposed project. As noted earlier in the Responses to Comments "A" and "C", the current MND project's incremental traffic additions to the alley (particularly to the east of the project site) will be nominal (net increases of only two vehicles during the AM peak hour and of three vehicles during the PM peak hour), and will not significantly affect the operations of the alley, including for emergency response vehicles.

Subcomments G.8 and G.9 refer to the internal configuration and operations of the proposed project's parking structure, including location of the primary security gate for the project's western (residential) driveway, as well as for the commercial valet operations and pedestrian access to and from the project's mezzanine parking level. These issues are subject to review and approval by both LADOT and the Department of Building and Safety, and will be designed and constructed to the satisfaction of these agencies (approvals of the final construction plans showing the final configurations for the subject items is required prior to the issuance of any building permits). However, it should be noted that the commenter's statement that the project traffic study indicates that the security gates should be placed a minimum of 40 feet from the alley, to provide a 40-foot vehicle reservoir (Subcomment G.8) is applicable only to the analyzed "four-parcel" project (for driveways serving between 101 and 300 parking spaces). LADOT's current Traffic Study Policies and Procedures call for driveways serving up to 100 spaces to provide a minimum 20-foot reservoir space. The MND ("three-parcel") project provides a total of approximately 119 parking spaces, with the western (residential) driveway serving parking levels P-2 and P-3, containing a total of approximately 77 spaces, while the eastern (commercial) driveway serves the remaining 42 spaces. There is adequate distance at both driveways to provide the required 20-foot distance between the alley and the security gates.

Response to Comment "H":

This comment (including all Subcomments H.1 through H.5) express the commenter's concerns regarding the project's construction-related activities, including restricting construction traffic to off-peak hours, construction worker parking and construction vehicle staging, and potential traffic lane closures along Wilshire Boulevard. The City of Los Angeles requires that all projects involving such construction activities prepare a detailed construction Traffic Management Plan

to address these and other issues associated with the actual construction of the project. The construction Traffic Management Plan identifies the number of construction-related vehicles and trips (including import/export haul trucks, construction equipment, and worker vehicles), anticipated haul routes, vehicle parking and staging areas, and other items noted by the commenter. Additionally, the project will be required to provide a Worksite Traffic Control Plan that will detail the specifics of any required lane closures along or adjacent to the project's frontage of Wilshire Boulevard (as well as in the alley, if necessary). Both the construction Traffic Management Plan, and Worksite Traffic Control Plans are typically prepared subsequent to the final approval of the project, but must be reviewed and approved by the City prior to the issuance of any building permits for the proposed development. Further, the City provides a number of standard conditions for construction-related activities that identify the allowable hours of construction and haul vehicle activity, as well as mitigation measures designed to address issues such as noise, dust, and other items. Therefore, procedures to address the potential construction-related traffic concerns expressed by the commenter already exist, and the fact that such information is not specifically included in the project's traffic study or MND does not reflect a lack of oversight or knowledge of these items, as they are typically identified and addressed in the required construction Traffic Management Plan.

This concludes our review of the transportation-related issues raised in the GE RealProp, LP appeal, including the supplemental review of the project traffic study by Mr. Basmaciyan, of the proposed Picasso Brentwood project's MND approval. Please feel free to contact me if you have any questions or comments regarding these responses to these comments.

Sincerely,

Ron Hirsch, P.E.
Principal

Attachments

Cc: Mr. Damon Mamalakis, Armbruster Goldsmith & Delvac LLP

Attachments

ATTACHMENT 1

Review of Traffic Study for the Proposed Picasso Brentwood Project

(Monday, November 15, 2013)

Prepared by Herman Basmaciyan, P.E.

REVIEW OF TRAFFIC STUDY
for the
PROPOSED PICASSO BRENTWOOD PROJECT
Monday, November 15, 2013

As requested, I have reviewed the Traffic Impact Analysis Report ("TIA") for the Picasso Brentwood Project, the proposed mixed use development at 12029-12041 Wilshire Boulevard in the City of Los Angeles, CA, prepared by Hirsch/Green Transportation Consulting, Inc. and dated August 2012. I have also referred to the applicable portions of the following:

1. Traffic Study Policies and Procedures (TSPP), Dated May 2012, published by the City of Los Angeles Department of Transportation (LADOT),

2. 2010 Congestion Management Program (CMP) prepared by the Los Angeles County Metropolitan Transportation Authority (LACTMA)

3. Proposed Mitigated Negative Declaration (MND) for the proposed project, that is identified as "Project Title: ENV-2012-2837-MND; Case Number: DIR-2012-2836-DB-CDO-SPR; Project Location: 12029-12035 W Wilshire Boulevard," prepared by the City of Los Angeles, and dated April 10, 2013.

4. Letter Report, dated January 8, 1997 prepared by Greer and Co., Traffic Engineers and Planners. This letter addresses some of the traffic issues associated with the alley that would constitute the northern boundary of the proposed development.

5. The Filing Package for the proposed Picasso Brentwood project, dated October 8, 2012.

6. Miscellaneous City of Los Angeles internal documents received in response to the Request for Public Records, containing e-mails and other items with dates during the period September 2012 and October 2013.

On October 7, 2013, I visited the site for the proposed project and I am aware of the concerns and issues as expressed by G. E. Realprop, owner of the Wilshire Motel which is located at 12027 Wilshire Boulevard, immediately to the east of, and abutting, the proposed project.

I am a Registered Civil and Traffic Engineer in the State of California (Registration Numbers 20137 and 525, respectively) and a Registered Engineer (in retired status) in the States of Washington, Arizona, and Florida. I have over 50 years of experience in traffic and transportation engineering, traffic modeling and

forecasting, parking studies, and the preparation of traffic impact studies. I have personally prepared or had a key role in the preparation of over 400 reports in various jurisdictions in California, Washington, Oregon, Arizona, Nevada, and Ohio, as well as several multi-State projects sponsored by the U.S. Department of Transportation. My curriculum vitae (cv.) is presented as **Exhibit 1**, attached.

Based on my review of the documents cited above and my education, professional knowledge, my site visit, and many years of experience, I have noted several discrepancies and/or omissions in the TIA for the proposed Picasso Brentwood Project. These discrepancies and/or omissions are discussed in the ensuing portions of this report. To facilitate identification of various buildings and streets referenced in the report, an aerial overview of the project site is presented in **Exhibit 2.**

A. The analysis in the TIA is based on a project description that differs from the project addressed in the MND. Because of this difference, the TIA describes a routing for traffic in the immediate vicinity of the project that would not be possible with the project described in the MND. Specifically, Figure 5 (Page 16) and Figures 7(a) and 7 (b) (Pages 24 and 25) in the TIA indicate north-south through traffic coming into and out of the residential or western project driveway. Such movements will not be possible to make because the residential driveway would face the building directly across on the north side of the east-west alley that would constitute the northern boundary of the proposed project. With this actual configuration, more project traffic would be directed down the alley in front of the Ralph's store than indicated in the TIA.

B. In the estimate of trips for the proposed development a "transit credit" of 15% is taken to reduce the vehicular trip generation. The TIA does not offer sufficient documentation to justify this level of credit for transit. Per the LADOT TSPP (Reference Document Number 1 on Page 1),

*"Developments within a 1/4 mile walking distance of a transit station, or of a RapidBus stop, may qualify for up to a **15%** transit credit. The actual credit provided will be determined by an analysis of the transit service frequency and density at the specified transit station or RapidBus stop intersection. To obtain the maximum credit, applicants should implement the following improvements (listed in priority order):*

- *Provide a wider than standard sidewalk along the streets fronting the project through additional sidewalk easement or by dedicating additional right-of-way beyond street standards.*

- *Improve the condition and/or aesthetics of existing sidewalks leading to transit station(s) with adequate lighting to provide for a safer pedestrian environment.*

- *Provide continuous paved sidewalks / walkways with adequate lighting from all buildings in the Project to nearby transit services and stops. This may include mid-block paseos.*

- *Implement transit shelter improvements/beautification."*

The TIA describes the available transit services in sufficient detail to consider that the service quantity and proximity requirements are met. However, the TIA does not explain how the physical improvement requirements itemized in the TSPP would be met by the proposed development. Thus the use of the maximum transit credit of 15% cannot be justified until it is demonstrated that all of the required improvements are feasible. If a smaller credit would be appropriate, such lesser amount allocated to transit would result in more vehicular traffic to/from the proposed development than disclosed to the public in the TIA.

C. The trip generation estimate in the TIA reduces the trip generation for the proposed project by incorrectly deducting from the total, the estimated trips for existing development on the site. The TIA incorrectly deducts existing trips for the building located at 12041 Wilshire Boulevard (AT&T Store plus office space). Since 12041 Wilshire Boulevard is not included in the demolition, this deduction is not appropriate and results in an underestimation of net project trips. In addition, a site inspection reveals that some of the space to be demolished is either vacant or is not of a nature to justify the use of the ITE trip generation rates that would be applicable to an active and typically busy commercial or office use. Accordingly, the trip generation for the existing uses is overstated and as a result the net number of trips added is understated. As a result, the TIA is flawed by these deficiencies.

D. The peak hourly intersection capacity and Level of service (LOS) calculations in the TIA assume that the following number of lanes on Wilshire Boulevard are available for vehicular through traffic at the intersection with South Bundy Drive:

> Eastbound: one left-turn lane, two through lanes, and one optional through/right-turn lane
> Westbound: one left-turn lane, two through lanes, and one optional through/right-turn lane

These lane assumptions ignore the fact that, a bus stop is located on westbound Wilshire Boulevard just east of the intersection (a near-side, or approach side bus stop). When a bus is stopped to discharge or board passengers, the lane would be blocked, reducing the capacity of the optional through/right-turn lane. During the period 7:00 to 8:00 AM, in the westbound direction on Wilshire Boulevard, 16 METRO and 4 Santa Monica Bus Lines buses are scheduled. Thus, during this 60-minute period, the right-hand lane would be effectively non-functional for a total of 10 minutes (estimated on the basis of 20 westbound buses during the hour and 30 seconds blockage per bus, including deceleration, passenger loading/unloading, and acceleration), representing about a 16.7% loss in the capacity of this lane. This reduction of intersection capacity has not been included in the TIA's LOS analysis.

During the period 4:00 to 5:00 PM, 14 METRO and 4 Santa Monica Bus Lines buses are scheduled. Accordingly, in the afternoon, the effect on intersection capacity would be similar to, but somewhat less than, the effect in the morning peak. This effect of the bus stop, as well as the presence of pedestrian traffic has not been considered in the intersection capacity and LOS analysis in the TIA.

A situation similar to, but not identical to, the westbound direction exists in the eastbound direction on Wilshire Boulevard. While the number of lanes is the same, the bus stop is located on the east side of South Bundy Drive (far-side or exit side bus stop). The far side bus stop does not interfere with right turns (eastbound Wilshire Boulevard to southbound to South Bundy Drive, but it affects through traffic, since vehicles traveling through the intersection must stop for a stopped bus on the far side or merge into the center lane. Similarly to the westbound direction, the capacity of the intersection is affected by the presence of the bus stop and for the presence of pedestrian traffic. This effect of the bus stop, as well as the presence of pedestrian traffic has not been considered in the intersection capacity and LOS analysis in the TIA.

Effect of bus stops on intersection capacity and LOS would be encountered at other intersections studied in the TIA as illustrated in the example above.

In summary, if the effect of the bus stops is taken into consideration, the congestion level and delays at the intersections analyzed would be greater than indicated in the TIA, most significantly at the intersection of Wilshire Boulevard and South Bundy Drive.

E. The procedures used by the LADOT for the assessment of traffic impacts are confined to intersections with traffic signals. Intersections with stop sign controls or no traffic controls are excluded from the TIA requirements. As a

result, traffic problems at non-signalized intersections, if any, are not identified, even when they may present adverse conditions such as long queuing and delays to motorists as well as potential safety hazards for motorists and pedestrians. Several issues associated with non-signalized intersections exist in the vicinity of the proposed development, as discussed in the following paragraphs.

1. Based on my personal observation, southbound traffic on South Bundy Drive was backed up on the approach to Wilshire Boulevard, even at a non-peak period; my observations were between 1:20 and 1:45 PM on October 7, 2013. The back-up routinely extended past the Ralph's driveway on South Bundy Drive and often as far as, and past, Goshen Avenue. With the long queues on South Bundy Drive, traffic exiting from the Ralph's driveway cannot access the southbound left turn pocket even when the pocket is empty or has few vehicles because the pocket does not extend as far north as the Ralph's driveway. Thus, left turning traffic coming out of the Ralph's driveway is often blocked from exiting onto South Bundy Drive. This problem will become worse when project traffic is added to existing and future traffic. Since the traffic analysis methodology used to assess intersection capacity and impact at the intersection of Wilshire Boulevard/ South Bundy Drive has no feature to recognize the presence of long queues and the secondary effects of long queues, this problem is not identified and addressed in the TIA.

2. Based on my personal observation, between 1:20 and 1:45 PM on October 7, 2013, there was a long northbound queue on South Bundy Drive starting just south of Goshen Avenue and extending northward towards Kiowa Avenue. With added traffic due to the proposed project such queuing would be expected to worsen, increasing delays to motorists. Photographs taken on Oct. 25 and Nov. 12, 2013 (See **Exhibit 3**, attached), illustrate this queuing attributable to the 4-way stop sign at Mayfield Avenue. Since the intersection of South Bundy Drive/Mayfield Avenue is controlled by a 4-way stop sign and is not signalized, the TIA does not address the potential traffic impacts of the proposed project at this intersection.

3. The intersection of Wilshire Boulevard/South Westgate Avenue is not analyzed in the TIA because it is not signalized. Left and right turns to and from South Westgate Avenue are permitted at this intersection. Easterly oriented traffic to and from the proposed project could and would use South Westgate Avenue. Approaching the project from the east, project traffic would turn right and access the east-west alley and thence the project site. Other alternatives to making this right turn are available further east, but would entail a longer travel in the east-west alley or the use of Goshen

Avenue, which would entail a longer total travel distance. Only one opportunity to make the right turn is available west of South Westgate Avenue, at the alley leading into the Ralph's parking lot. This route would entail incurring delays during peak periods due to the congestion at the intersection of Wilshire Boulevard/South Bundy Drive, a longer overall travel distance, and traversing the Ralph's parking lot.

For traffic leaving the proposed project and destined to points east via Wilshire Boulevard, South Westgate Avenue would be the first opportunity to make a left turn. Another option would be to continue travel on the east-west alley to access South Barrington Avenue and then make a left turn into Wilshire Boulevard at the signalized intersection of South Barrington Avenue/Wilshire Boulevard. This route would entail additional travel on the east-west alley and potentially encountering congestion and delay at the signalized intersection. Yet another option would be for project traffic to go out-of-direction to South Bundy Drive through the Ralph's parking lot, to make a left turn onto South Bundy Drive, then to make a left turn at the signalized intersection of South Bundy/ Drive/ Wilshire Boulevard. The problems associated with this latter alternative route have been discussed previously in this report.

In summary, it is expected that traffic approaching the proposed project from the east will use South Westgate Avenue and the east-west alley; likewise traffic from the proposed project and destined eastbound on Wilshire Boulevard would use the east-west alley and South Westgate Avenue. (In Figure 5, Page 16, the TIA indicates that project traffic would make right turns from westbound Wilshire Boulevard to South Westgate Avenue, but it indicates that there would be no left turns.) Additional left turns from South Westgate Avenue onto Wilshire Boulevard would increase the potential for collisions at the intersection. In addition, there is a marked crosswalk across Wilshire Boulevard about 170 ft. east of South Westgate Avenue, introducing potential pedestrian safety impacts, due to the short reaction time that would be available to the motorists making the left turn, as well as the pedestrians intending to use the crosswalk. The TIA is deficient due to its silence on these traffic operational and potential safety matters.

F. The Letter Report dated January 8, 1997 (Item 4 cited on the first page of this report) describes the east-west alley on the north side of the proposed development as:

"The character of the alley north of Wilshire between Bundy and Westgate is that of an active commercial alley."

Based on the content of the letter, there was concern about traffic in the alley as long ago as 16 years, and the report was prepared to address issues known or observed at that time. Furthermore, City staff correspondence (See Item 6 on Page 1) indicates that City staff was aware that the alley had a width of 15 feet along the frontage of the proposed project and 17.5 feet further east.

In view of this prior knowledge, the TIA should have addressed the traffic-related issues associated with the alley that has less width than the City's standard of 20 feet. Instead, the City staff's focus appears to be on building setback requirements. As a result, the discussion in the TIA is superficial and does not address traffic operational issues in an alley that is narrower than the City's requirement of 20 feet.

G. The TIA does not address traffic operational and potential vehicular and pedestrian safety issues associated with increased traffic in the east-west alley that are discussed in the following paragraphs.

1. The proposed development will add traffic to the portion of the east-west alley that traverses the frontage of Ralph's and lies between the store's entrance/exit and the parking areas. Virtually all pedestrian traffic between the store and the parking areas must cross the alley on the way into and out of the store. Pedestrians leave the store pushing grocery carts or carrying bags. Increased vehicular traffic in front of the store will result in increased opportunities for conflicts between vehicular and pedestrian traffic. This potential impact on pedestrian safety should have been, but was not addressed in the TIA. (See aerial photos in **Exhibit 2** for an illustration of this safety issue not disclosed or analyzed in the TIA.)

2. On Page 27, the TIA states that:

   "Alleys, such as the one adjacent to the project's northern property line, are typically dedicated to provide a total 20-foot right-of-way and improvement width, or 10-foot half right-of-way and improvement. The alley adjacent to the project site is currently dedicated and improved to its full 10-foot half right-of-way and roadway widths, therefore, no additional dedications or roadway widening improvements are required."

   According to City of Los Angeles Bureau of Engineering (BOE) records (included in the documents identified in Item 6 on Page 1), the width of the alley is 15 feet along the frontage of the proposed project and for a short distance to the west. Further west, through the Ralph's parking lot, the

alley is 20 feet in width. To the east of the proposed project the alley has a width of 17.5. This width of 17.5 feet may not be available throughout the eastern portion of the alley due to the presence of power poles along the south side of the alley and possibly due to some apparent encroachments into the traveled way along the alley at various locations on both sides. At locations where the traveled way has a width of 15 (along the alley frontage of the proposed project or 17.5 feet, it is very difficult for two vehicles approaching each other to squeeze by. With the addition of project traffic there will be more instances where two vehicles will need to squeeze by, creating more opportunities for collisions. In addition turns into and out of the driveways for the proposed project will be very tight, especially for right turns. Most (if not all) drivers making right turns into and out of the proposed project will be likely to encroach onto the path of oncoming traffic, creating additional opportunities for collisions. Photographs taken in the alley late in October 2013 are presented in **Exhibit 4** to illustrate the constricted conditions in the alley.

3. In the Ground floor/P2 site layout, the width of the driveways is not shown. The City must ensure that the driveways will be sufficiently wide to allow entering and leaving vehicles, including all vehicles in personal use such as large vans, SUVs and trucks, to get by each other comfortably (without having to squeeze by or having to encroach into each others' travel path. Likewise, the residential parking spaces and parking aisles need to have appropriate dimensions to accommodate all personal vehicles. This matter will be particularly important because tandem parking will be used for a large portion of the parking spaces.

4. The matter of sight distance at the juncture of the project driveways and the east-west alley is not disclosed or discussed in the TIA. Since the building face on either side of the driveways will be flush with the alley (with no setback) sight distance at the juncture of the project driveways and the east-west alley will be restricted, creating a hazardous condition for motorists using the project driveways as well as those traveling in the alley.

   The speed limit for vehicles traveling in an alley is 15 mph. A vehicle traveling at 15 miles per hour (mph) can be brought to a complete stop in 44 feet (including driver's reaction time, application of the brakes, and the distance the vehicle travels from the time the brakes are applied until it comes to a complete stop). For a vehicle traveling at 20 mph the stopping distance is 63 feet; in both cases the stopping distance for trucks is about 10% longer. A motorist traveling in the alley would have no problem stopping in time to avoid a collision with a vehicle exiting from either of the driveways of the proposed project, provided that the exiting vehicle

encroaches into the alley when the vehicle in the alley is at least 44 feet away (or longer distance for a higher speed). The sight distance problem arises because the motorist exiting from the driveway cannot see to either side of the alley when the front of his/her vehicle has reached the alley because the eye position of the driver is about 6 to 10 feet further back and the driver's line of sight would be blocked by the building. The vehicle would need to encroach into the alley by 6 to 10 feet before the driver would have a clear view of the alley. If a vehicle approaching the driveway is closer than 44 feet in the alley at the time the exiting vehicle is 6 to 10 feet into the alley, a collision is likely to result.

To reduce the chances of such collisions, appropriate measures should be taken in the form of warning signs and/or markings to drivers, installation of mirrors, and other measures that may be deemed appropriate. The MND should have but did not specify such measures.

5. The TIA is silent on the issue of commercial vehicles that now use the east-west alley and commercial vehicle traffic that will be added to the alley by the proposed development and whether size or weight restrictions for commercial vehicles will be imposed. Increased commercial truck activity due to the proposed project will consist of such components as trash trucks, deliveries to the commercial uses in the proposed development, moving trucks to serve the needs of residents moving in or out of residences, and others. Any commercial vehicles stopped because of necessity (such as trash collection trucks) or parked illegally in the alley for loading/unloading or other reasons, will constrict traffic circulation in the alley and create sight distance problems, leading to potential collisions. Please see the photographs in **Exhibit 4** that illustrate these concerns. In the last picture, please note the pedestrian in the alley, co-mingling with vehicular traffic. When two trucks come face to face and cannot pass each other, one truck often must back significant lengths backwards in the alley in order to allow the other truck to pass.

6. The size of the loading area for the proposed development is about 16 to 17 feet deep and about 18 to 20 feet wide. This loading area would be large enough to accommodate small delivery vehicles such as those used for mail, FedEx, UPS, etc. Two such vehicles could be accommodated simultaneously in the loading area. On the other hand any vehicle longer than about 17 feet (such as a 3-axle truck) would encroach into the alley when using the loading area. Such encroachment would restrict the width of the alley. Depending on the length of the truck, the encroachment into the alley will make it very difficult, or impossible, for two vehicles to get by one another. Also, a truck encroaching into the alley will introduce

sight distance issues in addition to those discussed previously, since drivers who attempt to get by an encroaching truck will not have a clear view of vehicles approaching in the opposite direction.

7. Any obstruction of the east-west alley -- whether a vehicle parked improperly in the alley, a truck encroaching into the alley while parked partially in the loading area, or any other -- would affect response time for emergency vehicles. The proposed development will introduce additional opportunities for blockage in the east-west alley and potentially result in increases in the response time for emergency vehicles.

   The City of Los Angeles Fire Department (LAFD) requires that if a building is located more than 150 ft from a street or alley the developer should provide an access road to the property. In the case of the proposed project, an access road would not be required because the property is bounded by Wilshire Boulevard and the alley. The property is 150 feet in depth (150 feet in the north-south direction) such that the north side of the building (abutting the alley) would be more than 150 feet away from the traveled way on Wilshire Boulevard. Therefore, the fire department would need, or might prefer to use, the alley to service the north side of the property in case of an emergency.

   The TIA and/or the MND should have addressed the matter of emergency vehicle access, but neither did. Keeping the alley free of any obstructions, such as parked vehicles, fixed objects, or movable objects, would be essential for the operation of emergency vehicles, especially fire engines and trucks. The proposed project will increase the opportunities for blockages in the alley – more traffic, more opportunities for illegal parking, more vehicles for loading/unloading stopped or intruding into the alley, more refuse collection vehicles, more utility service vehicles, and others.

8. On Page 26, the TIA states that a security gate will be placed on the western project driveway to prevent unauthorized vehicles from entering the residential parking area. The TIA further states that the security gate would be placed 40 feet in from the alley. It is unclear from information available at this time whether the driveway will be at least 40 feet in length. If the security gate would need to be placed less than 40 feet away from the alley, encroachment into the alley may occur when two or more vehicles come into the driveway at the same time. Also, it is unclear how the operation of valet parking for the commercial patrons will be handled and whether more than one vehicle at a time can be handled without back-up in

the commercial driveway that appears to be about 35 feet long. The TIA should have publicly disclosed and analyzed this issue but did not.

9. On the Commercial Mezzanine Level (Parking Level P1) of the building there will be residential and commercial parking, and there will be no physical separation (gate or barrier) between the residential and commercial parking areas. It is not specified how the valet service will be prevented from using the residential spaces for parking vehicles that arrive to go to the commercial establishments on the property.

   Also, it is unclear how pedestrians who park at the mezzanine level would access the elevator. Would the only route be through the gym or would it be possible to walk around the gym on the east side?

   The TIA should have publicly disclosed and analyzed this safety issue but did not.

H. Neither the MND nor the TIA addresses potential traffic impacts during the construction period.

   1. The letter dated October 16, 2012 from the City of Los Angeles DOT to the Planning Department recommends that construction related traffic impacts be restricted to off-peak hours. The MND is silent as to this recommendation; the NMD merely restricts the construction hours to 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. Per the TIA approved by the City DOT, the morning peak period is defined as 7:00 AM to 10:00 AM, and the afternoon peak period is 4:00 PM to 7:00 PM. Neither the TIA nor the TSPP defines the peak period for Saturdays, when presumably construction could occur between 8:00 AM and 6:00 PM. The MND should have considered the recommendation of the DOT about restricting construction traffic impacts to off-peak hours and should have specified appropriate measures to ensure compliance.

   2. Neither the MND nor the TIA addresses the matter of parking for demolition, grading, and construction workers during the construction period. Since on-site parking will not be available during some or all of the construction period, workers will need to park in on-street spaces or in off-street parking areas elsewhere. As a result, there will be parking and traffic impacts in residential areas in the vicinity. Mitigation measures for such traffic and parking impacts should have been but were not presented in the MND.

3. Since the parking spaces on the north (westbound) side of Wilshire Boulevard would not be available during peak hours when the parking area is used for a third westbound lane, strict enforcement will be necessary to ensure that these parking spaces are clear of all vehicles, including construction vehicles, during peak periods. The MND should have, but did not present, appropriate measures to ensure that the third westbound lane will be available during peak periods.

4. The MND should have specified what measures would be in place to ensure that construction vehicles do not park in the alley except for the minimum length of time necessary for loading and unloading. The MND should have, but did not present, appropriate measures to ensure that construction vehicles will not encroach into the alley.

5. It is unclear how demolition and other construction-related trucks will access the site. Since the site does not have driveways on Wilshire Boulevard, the majority of, if not all, construction trucks will need to use the alley. Deferring such matters as the designation of haul routes, detours, and traffic controls during the construction period to a later date, as suggested by the City of Los Angeles DOT, is not adequate to prevent potential impacts on adjoining properties and residential areas. Because of additional truck traffic in the alley during the construction period, beyond those items discussed in Paragraph G, there will be additional traffic operational issues associated with the narrow alley, or some of the issues discussed previously will increase in magnitude.

In summary the MND's discussion of construction impacts does not address traffic and parking impacts, adequately.

EXHIBIT 1
Curriculum Vitae
of
Herman Basmaciyan, P.E.

Herman Basmaciyan, P.E.

Profile

- Over 50 years of transportation planning and traffic engineering experience, including services to legal professionals
- Expert witness services in San Diego, Orange, Los Angeles, Riverside, and San Mateo Counties in eminent domain, traffic engineering, transportation engineering/planning, and parking matters
- Experience in numerous traffic impact studies, transportation planning projects, parking studies, analysis of land use/transportation system interrelationships and traffic/transportation engineering
- Management of, or key role in, a wide variety of transportation/traffic engineering projects in California, Oregon, Washington, Arizona, Nevada, Colorado, Montana, New Mexico, Ohio, and Louisiana

Education

- Master of Science in Civil Engineering, University of Virginia, 1962
- Bachelor of Science in Civil Engineering, Robert College,1960
- Numerous Short Courses in Transportation and Traffic Engineering

Registration

Professional Engineer:

- California, Civil
- California, Traffic
- Arizona (retired status)
- Florida (retired status)
- Washington (retired status)

Professional Organizations

- Institute of Transportation Engineers
- American Society of Civil Engineers

Employment History

- **Individual** Providing Expert Witness and Consultant Services, Corona del Mar, CA, since January 2005
- **Transportation Consultant,** County of Riverside, Riverside, CA, 2005-2011
- **Vice President**, Kimley-Horn and Associates, Inc, Orange, CA 1992-2004
- **Principal**, Basmaciyan-Darnell, Inc., Irvine, CA 1978-1992
- **Principal**, Herman Basmaciyan and Associates, Newport Beach, CA 1976-1978
- **Senior Associate**, VTN Corporation, Irvine, CA, and Bellevue, WA 1971-1976
- **Senior Transportation Planning Engineer**, DeLeuw, Cather and Company, San Francisco, CA 1970-1971

- **Advisory Analyst**, Service Bureau Corporation (then a subsidiary of IBM), Palo Alto, CA 1967-1970
- **Director**, Puget Sound Regional Transportation Study, Seattle, WA 1962-1967
- **Research Assistant**, Virginia Council of Highway Research, Charlottesville, VA 1960-1962

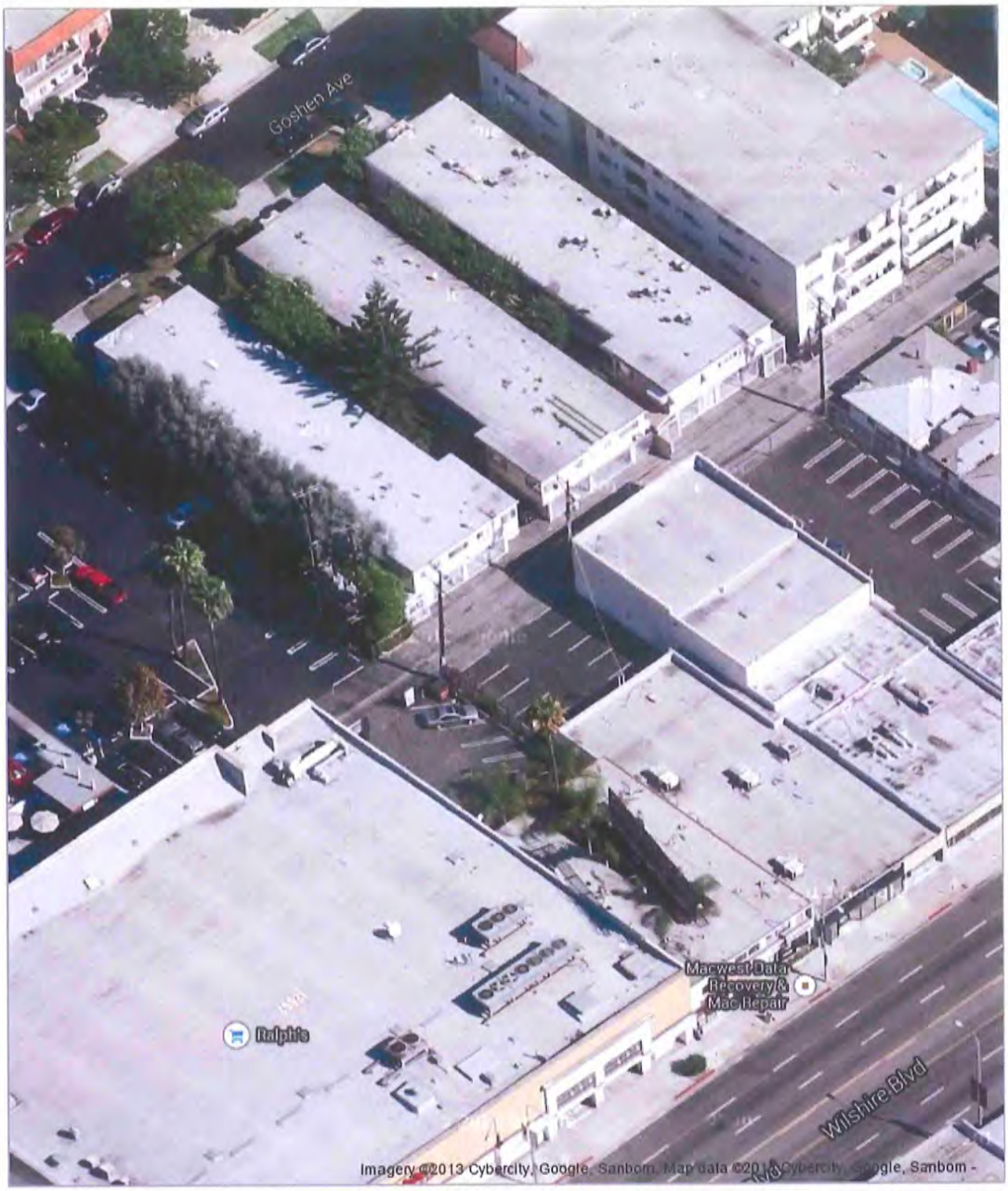
EXHIBIT 2

Aerial Photos of Vicinity of Proposed Project and Vicinity

AERIAL VIEW OF VICINITY OF PROPOSED PROJECT

Location of Proposed Project and Adjacent Properties Ralph's Store, Parking Lot, and Pedestrian Entrance Location of Alley that lies between the Ralph's Parking Lot and Entrance to Store

Western Portion of Ralph's Parking Lot



Eastern Portion of Ralph's Parking Lot

The existing building immediately adjacent to the east side of the Ralph's Store is the AT&T Store. The AT&T Store is not a part of the Proposed Project and will not be demolished. The three buildings to the east of the AT&T Store are part of the Proposed Project and will be demolished. The existing building further east is the Wilshire Motel and will remain in place and will abut the Proposed Project.

EXHIBIT 3
Queuing on South Bundy Boulevard

Photographs Taken on October 25, 2013 at Approximately 5:00 PM and on November 12, 2013 in the Vicinity of South Bundy Drive/Mayfield Avenue

Photos taken on Oct. 25, 2013. Northbound traffic on South Bundy Drive approaching the STOP sign at the intersection of Mayfield Avenue is backed up. The STOP sign is visible in the photo in the center. Also, in same photo, note southbound traffic backed up at STOP sign,

The tall buildings in the background are at Wilshire Boulevard.

Photos taken on October 25, 2013. Compared to the previous photo, these are slightly different views of backed-up northbound traffic on South Bundy Drive approaching Mayfield Avenue.

These two photos, taken on November 12, 2013, illustrate backed-up northbound traffic at the STOP sign on South Bundy Boulevard approaching Mayfield Avenue.

These two photos, taken on November, 2013, illustrate backed-up southbound traffic at the STOP sign on South Bundy Boulevard approaching Mayfield Avenue.

This photo, taken on November 12, 2013 illustrates southbound traffic on South Bundy Boulevard blocked by trailer truck turning left from Goshen Avenue onto South Bundy Drive.

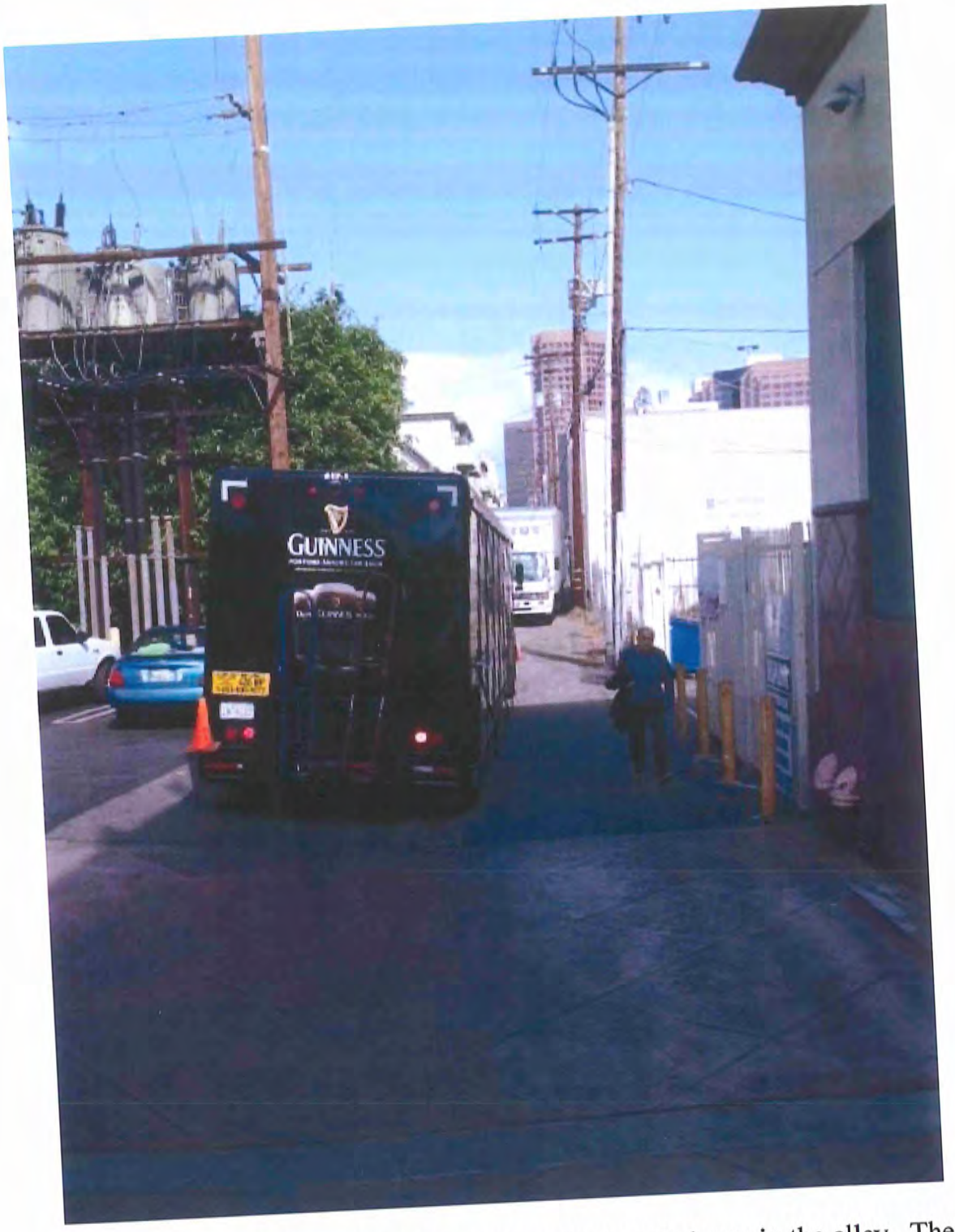
EXHIBIT 4
Photographs Taken in Alley on October 29, 2013

These photographs illustrate various problems that are due to the narrow alley and the different types of vehicles that use the alley.

In this photo, note the dent (lower right hand side) in the wall that apparently was made by a vehicle that hit it and tore out a sizeable piece of it and caused a crack in the wall. Also note parked truck on the left and the delivery truck trying to squeeze by.

Refuse collection truck blocks the entire alley, making it impassable for traffic to go by in either direction.

A variety of vehicles use the alley. Note the variations in the width of the alley. The pick-up truck is delayed while the eastbound truck is trying to squeeze by the parked truck. The utility pole on the right hand side is at the western boundary of the proposed project where the alley width is 15 feet.



Commercial vehicles and pedestrian share the traveled way in the alley. The textured pavement in the lower portion of the photo is in front of the Ralph's store. The parked passenger vehicles are in the Ralph's parking lot.

ATTACHMENT 2

Picasso Brentwood Project

MND (Three-Parcel) Project Trip Generation, Traffic Assignments, and Driveway Volumes

12029-12035 Wilshire Boulevard Mixed-Use Project
Three-Parcel (MND) Project
Trip Generation Calculations

Project Description

Proposed Uses

81 -unit Apartment (including 8 low-income units)
7,745 sq. ft. Specialty Retail (includes approximately 1,500 sq. ft. mezzanine area)

Existing Uses (Removed)

2,527 sq. ft. Office (12029 Wilshire Boulevard)
9,393 sq. ft. Office (12033 Wilshire Boulevard; 7,366 sq. ft. ground floor plus 2,027 sq. ft. mezzanine)
5,138 sq. ft. Office (12035 Wilshire Boulevard)

Project and Existing Uses Trip Generation Rates and Assumptions:

Proposed Uses

Apartment - per dwelling unit (ITE Land Use 220)

Daily Trips:	T = 6.65 (U)	
AM Peak Hour:	T = 0.51 (U); I/B = 20%, O/B = 80%	
PM Peak Hour: *	T = 0.49 (U); I/B = 65%, O/B = 35%	

Specialty Retail Center - per 1,000 gross square feet of floor area (ITE Land Use 814)

Daily Trips:	T = 44.32 (A)	
AM Peak Hour:	T = 1.33 (A); I/B = 60%, O/B = 40%	(3% of Daily, per SanDAG)
PM Peak Hour: *	T = 5.00 (A); I/B = 44%, O/B = 56%	(WLA TIMP "Specialty Retail")

General Office - per 1,000 gross square feet of floor area (ITE Land Use 710)

Daily Trips:	T = 11.01 (A)	
AM Peak Hour:	T = 1.55 (A); I/B = 88%, O/B = 12%	
PM Peak Hour: *	T = 2.84 (A); I/B = 17%, O/B = 83%	(20,000 sq. ft. or less)

Where: T = Trip Ends; U = Number of Residential Units; A = Building Area in 1,000 sq. ft.
I/B = Inbound Trip Percentage; O/B = Outbound Trip Percentage

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* Note:
PM peak hour trip generates specified by West Los Angeles Transportation Improvement Specific Plan (TIMP)
Daily and AM peak hour trip generation rates per 8th Ed. ITE Trip Generation, unless noted

Project and Existing Site Uses Trip Generation Adjustments:

Residential: 5% reduction in trips due to low-income units (per percentage of total residential units)
15% reduction in trips due to transit use by project residents (site within 1/4 mile of RapidBus stop)

Retail/Office: 5% reduction in trips due to "internal" patronage by project residents (Proposed Retail Only)
10% reduction in trips due to "pass-by" patronage from existing area traffic (Proposed Retail Only)
15% reduction in trips due to transit use by project patrons (site within 1/4 mile of RapidBus stop)

12029-12035 Wilshire Boulevard Mixed-Use Project
Three-Parcel (MND) Project
Trip Generation Calculations

Project Trip Generation Estimates:

Size/Use	Daily	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
Proposed Project							
81 -unit Apartment (including 8 low-income units)	539	8	33	41	26	14	40
(Less 0.5% Low-income Unit Adjustment)	(3)	0	0	0	0	0	0
(Less 15% Transit Utilization)	(80)	(1)	(5)	(6)	(4)	(2)	(6)
Subtotal Proposed Apartment Trips	456	7	28	35	22	12	34
7,745 sq. ft. Specialty Retail	343	6	4	10	17	22	39
(Less 5% Internal Project Capture)	(17)	(1)	0	(1)	(1)	(1)	(2)
(Less 15% Transit Utilization)	(49)	(1)	0	(1)	(3)	(3)	(6)
(Less 10% Pass-by Trips)	(28)	(1)	0	(1)	(1)	(2)	(3)
Subtotal Specialty Retail Trips	249	3	4	7	12	16	28
Total Net Project Trips	*705*	*10*	*32*	*42*	*34*	*28*	*62*
Less Existing Development							
12029 Wilshire Boulevard							
2,527 sq. ft. Office (12029 Wilshire Boulevard)	28	4	0	4	1	6	7
(Less 15% Transit Utilization)	(4)	(1)	0	(1)	0	(1)	(1)
Subtotal Existing 12029 Wilshire Trips	24	3	0	3	1	5	6
12033 Wilshire Boulevard							
9,393 sq. ft. Office (12033 Wilshire Boulevard)	103	13	2	15	5	22	27
(Less 15% Transit Utilization)	(15)	(2)	0	(2)	(1)	(3)	(4)
Subtotal Existing 12033 Wilshire Trips	88	11	2	13	4	19	23
12035 Wilshire Boulevard							
5,138 sq. ft. Office (12035 Wilshire Boulevard)	57	7	1	8	3	12	15
(Less 15% Transit Utilization)	(9)	(1)	0	(1)	0	(2)	(2)
Subtotal Existing 12035 Wilshire Trips	48	6	1	7	3	10	13
Total Existing Site Trips (12029 - 12035 Wilshire)	*160*	*20*	*3*	*23*	*8*	*34*	*42*
Total Net New Project Site Trips	***545***	***(10)***	***29***	***19***	***26***	***(6)***	***20***

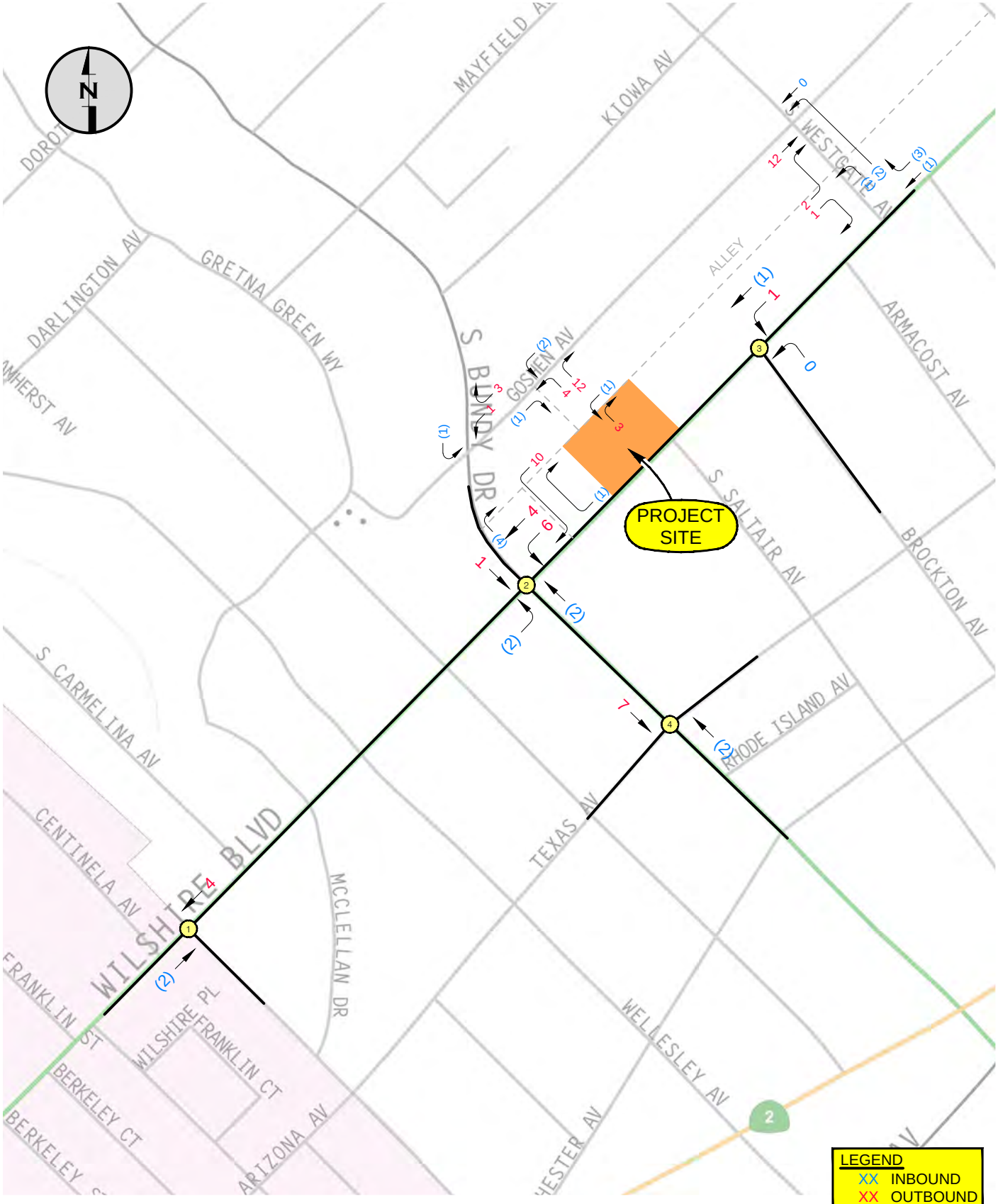


FIGURE A-1(a)

NET MND (THREE-PARCEL) PROJECT TRIPS
AM PEAK HOUR
(NO PASS-BY TRIP REDUCTIONS)

Hirsch/Green Transportation Consulting, Inc.

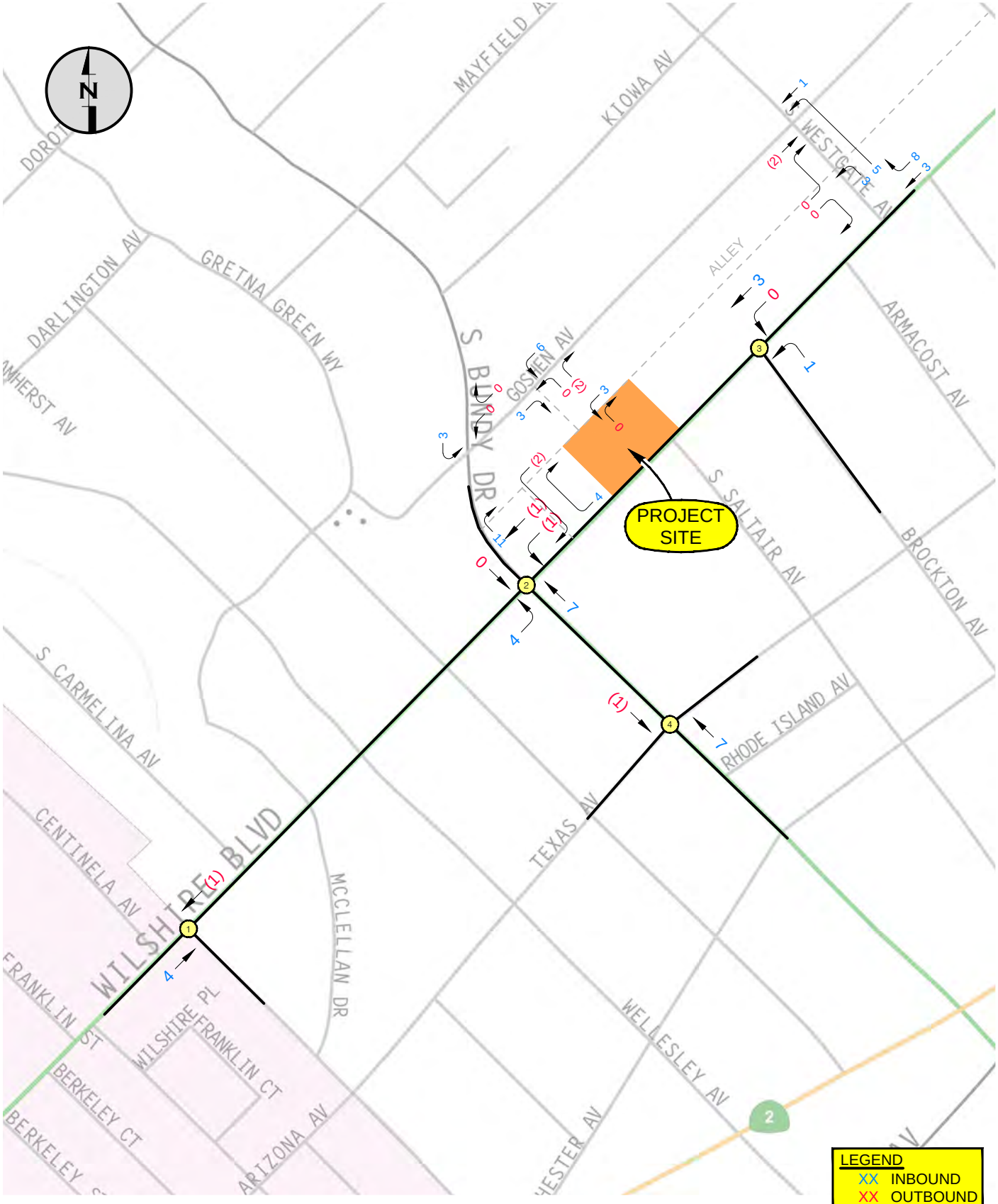
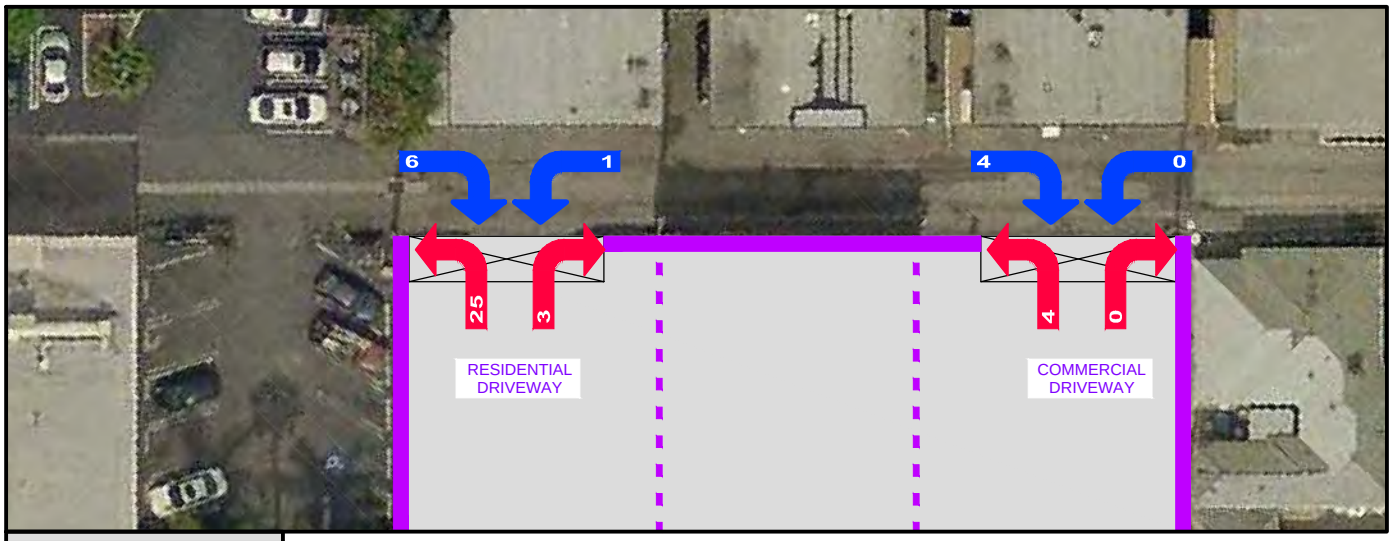


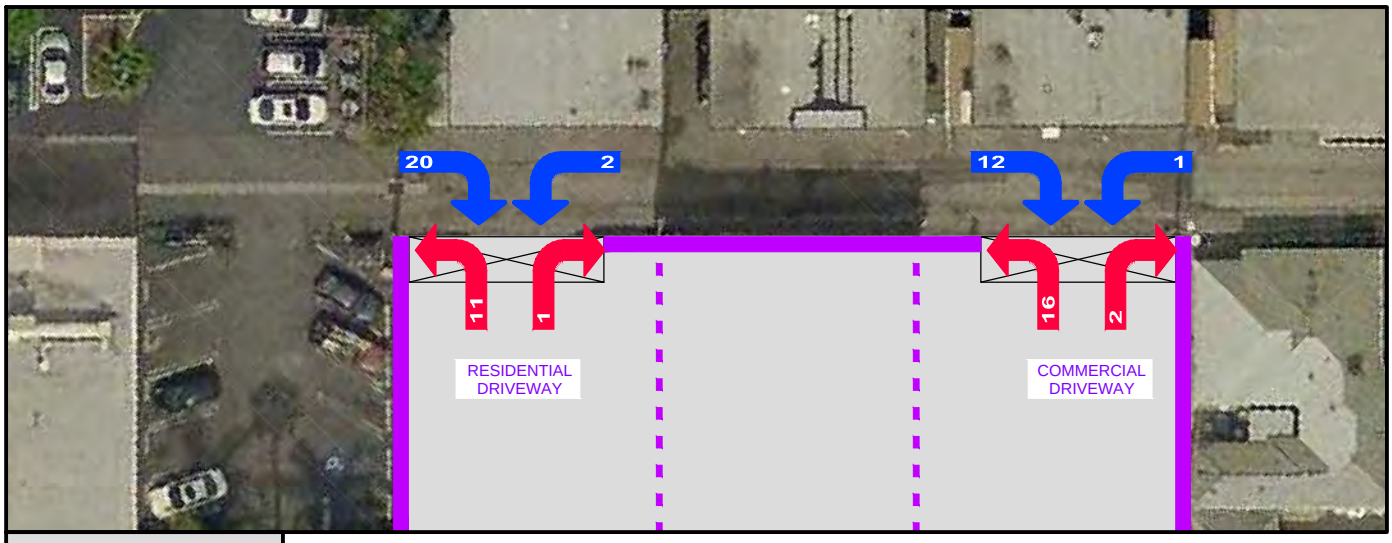
FIGURE A-1(b)

NET MND (THREE-PARCEL) PROJECT TRIPS
PM PEAK HOUR
(NO PASS-BY TRIP REDUCTIONS)

Hirsch/Green Transportation Consulting, Inc.



AM PEAK HOUR



PM PEAK HOUR

LEGEND
XX INBOUND
XX OUTBOUND

FIGURE A-2

MND (THREE-PARCEL) PROJECT
DRIVEWAY VOLUMES
AM AND PM PEAK HOURS

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.