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VIA PERSONAL DELIVERY

VIA EMAIL (to SharonGin@lacity.org)

September 16, 2014

Councilmember Jose Huizar, Chair
Councilmember Gilbert A. Cedillo
Councilmember Mitchell Englander
Los Angeles City Council PLUM Committee
c/o Los Angeles City Clerk
200 N. Spring Street, Rm. 395
Los Angeles, CA 90012

Re: Objections to Agenda Item No. 3 (Council File 14-0218); Appeal of
Case No. DIR-2012-2836-DB-SPR-CDO and ENV-2012-2837-MND

Hon. PLUM Committee Members:

This office represents GE RealProp, LP, owner of the Wilshire Motel at 12023 Wilshire Blvd., Los Angeles, California. The Wilshire motel is a one-story motor court style motel that is adjacent to, and will be adversely affected by, the proposed Picasso Brentwood Project ("Project") at 12027-12035 Wilshire Blvd. This appeal of Case No DIR-2012-2836-DB-SPR-CDO and ENV-2012-2837-MND is filed on its behalf.

As a preliminary matter, please ensure that notice of all hearings, actions, events and decisions related to the Project are timely provided to this office. All objections, including those regarding proper notice and due process, are expressly reserved. All prior objection letters submitted on behalf of Appellant are incorporated herein by reference.

**I. APPELLANT RE-ADOPTS ALL OBJECTION LETTERS AND
EVIDENCE PREVIOUSLY FILED WITH THE CITY, INCLUDING THE
PLANNING COMMISSION AND CITY COUNCIL.**

Pursuant to Public Resources Code Sections 21167.6(e) and 21177, all correspondence and evidence submitted before the Planning Commission and prior to the

final hearing in a case are part of the administrative record. All previous correspondence and evidence submitted are hereby incorporated by reference into this global objection letter to the Project due to the City's failure in the MND and otherwise to disclose, properly analyze, and mitigate significant impacts on Appellant and the surrounding community.

II. APPELLANT FURTHER OBJECTS TO THE USE OF AN MND THAT CLEARLY FAILS TO ADEQUATELY MITIGATE THE IMPACTS OF THE PROJECT.

Appellant's noise and air quality expert, Hans Giroux & Associates, and traffic expert, Herman Basmaciyar, submit additional analysis of the undisclosed and unmitigated impacts of the Project on Appellant's property and the surrounding community. Please see their attached further analyses as additional bases to conclude that the Mitigated Negative Declaration is insufficient as an environmental clearance document for this project.

A. There Is A Fair Argument Of Potentially Significant Noise Impacts That Have Not Been Analyzed Or Mitigated.

The Initial Study noted that excessive noise may be generated during the construction phase of the Project. The Applicant's own submissions to the City Planning Commission confirmed this and went even further, providing evidence of a fair argument that potentially significant noise impacts will exist even after "mitigation."

A memorandum dated November 8, 2013 from Matrix Environmental, submitted by counsel for the Applicant to the CPC, indicated that the average (L_{eq}) noise level generated by construction noise typically ranges from 77 dBA to 89 dBA at 50 feet from the source, exceeding the noise limit of 75 dBA in residential areas.¹ Even at 200 feet –

¹ While not in a residential zone, the City and Application have implicitly and explicitly treated the 75 dBA noise limit as a threshold for construction noise impacts near residential uses. The Los Angeles Municipal Code generally treats hotels as the equivalent of a residential use for the purpose of ordinances. See L.A.M.C §41.40(a). There is also property zoned R3-1 directly across the alley, within 500 feet of the Project. Indeed, the alley is only 20-feet wide, placing the buildings directly across the alley much less than 50 feet from the project property line. The maps contained in **Exhibit 1** provide

greater than the width of the Project site – the 75dBA noise limit would still be exceeded by excavation and building erection/finishing.

The November 8, 2013 Matrix memo acknowledges that Mitigation XII-20 might not reduce construction noise impacts to less than the 75 dBA limit, even with additional mitigation suggested by Matrix, but not incorporated into CPC approval. An updated memorandum from Matrix Environmental, dated July 23, 2014 and submitted to PLUM, suggests further mitigation, but again acknowledged that Mitigation XII-20 may potentially not reduce construction noise levels to less than 75 dBA. Nevertheless, both Matrix memos conclude that construction impacts would be less than significant and offer no additional mitigation.

That conclusion is incorrect. Based upon both the attached Giroux analysis (**Exhibit 2**) and the following additional comments, the Project will still generate significant noise impacts that have not been sufficiently analyzed and mitigated beneath the level of significance.

Matrix asserts that the 75 dBA noise limit does not apply because pursuant to L.A.M.C § 112.05 “said noise limitations shall not apply where compliance therewith is technically infeasible.” That does not mean, however, that the noise level will be reduced to a level less than significant.² A noise level the City generally treats as a threshold of significance will still be exceeded. The Guidelines for Noise Compatible Land Use in the City’s General Plan Noise Element deems 75 decibels as a “clearly unacceptable” exterior sound level for motels. (**Exhibit 4.**)

There is also no evidence that the additional mitigation suggested in the Matrix memo would be effective. As the Matrix memo itself notes, excavation and building

context as to how narrow the alley is and how close the buildings across the alley are to each other.

² It is also not clear that all technically feasible mitigation measures have been applied to the Project. In his correspondence, Mr. Basmaciyani identified a recommendation from LADOT to limit construction to off-peak daytime hours that appears not to have been included as Project mitigation. See **Exhibit 3**. While primarily a traffic related mitigation measure, peak hour construction restrictions would also mitigate noise impacts, especially in the a.m. peak.

erection/finishing noises may still exceed 75dBA at the opposite end of the Project site. That 75dbA noise limit will also be exceeded in the R3-1 zone across the 20-foot alley.

As the Applicant's consultant acknowledges, construction noise is still expected to exceed 75 dBA, even after "mitigation," something the Initial Study and MND do not acknowledge.

B. There Is A Fair Argument Of Potentially Significant Traffic/Circulation Impacts That Have Not Been Analyzed Or Mitigated.

As noted in the attached correspondence of Mr. Herman Basmacıyan (**Exhibit 3**), there remain traffic and circulation impacts that are unanalyzed and unmitigated. These include no or inadequate analysis of the additional traffic in the alley, including with regard to the current substandard nature of the alley, and loading and unloading operations in the alley.

The failure to analyze, in no small part, is the failure to analyze unsignalized intersections. While LADOT policies and procedures may not require traffic impacts at unsignalized intersections to be analyzed, that does not mean that significant impacts may not exist. Indeed, based on both personal observation and his decades of professional experience, Mr. Basmacıyan has also identified significant Project impacts to traffic and circulation at nearby unsignalized intersections that have neither been analyzed nor mitigated.

IV. CONCLUSION.

The Planning Commission erred and abused its discretion in making findings that are not supported by substantial evidence in the record. Moreover, the conclusions of the Project MND on which the Planning Commission relied are themselves not supported by substantial evidence in the record, including but not limited to the impacts identified above and others that may be presented at the hearing of this matter.

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Appellant is aggrieved by the decision of the Planning Commission in that Appellant and the adjoining community will be adversely affected by the negative impacts of the Project. Appellant is also aggrieved when decisions are made as to the Project that are not in compliance with applicable statutes and ordinances.

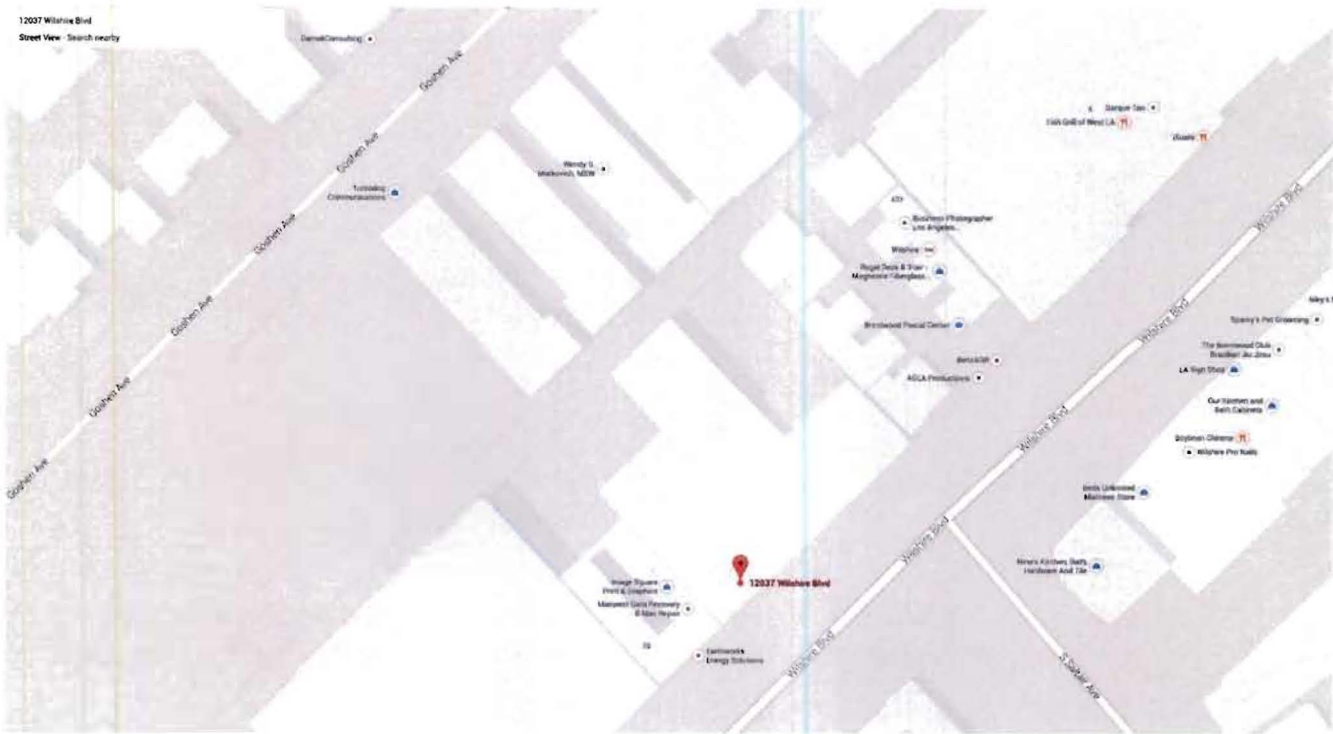
Very truly yours,

A handwritten signature in blue ink, appearing to read 'B. S. Torgan', with a stylized flourish at the end.

BRADLY S. TORGAN, AICP
FOR
THE SILVERSTEIN LAW FIRM

BST:aa

EXHIBIT 1



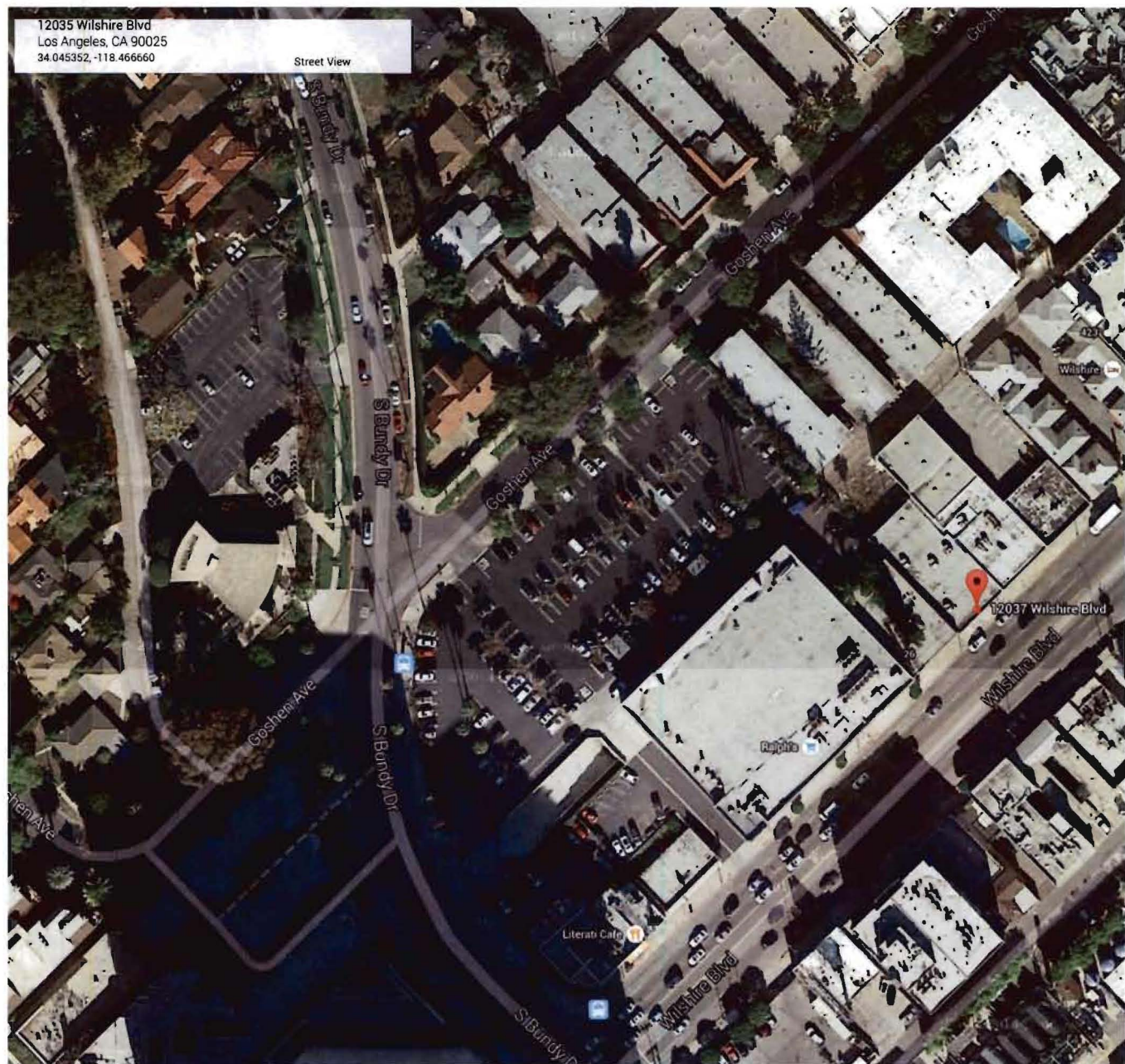


EXHIBIT 2

MEMO

To: Robert Silverstein, Esq.
From: Hans Giroux, Giroux & Associates
Re: Wilshire Motel Objections
Date: September 15, 2014

As per your request, we have reviewed the proposed Picasso project additional materials submittal (Goldsmith, et al.) to determine if any issues had been resolved or if new issues have been raised by suggested modifications to mitigation measures.

Although the additional materials continue to argue that a motel is not a noise-sensitive, air pollution sensitive or shade sensitive use, some incomplete and ineffectual attempt at impact analysis and minimization has now been made. It was pointed out previously that the apartments across the alley have an almost identical distance separation from the proposed project as the motel site and they are indeed environmentally sensitive uses by all definition of "sensitive." We previously pointed out that the CEQA Guidelines state that an impact should be considered potentially significant if it violates an adopted ordinance. The City of Los Angeles noise ordinance for construction activities finds that construction equipment noise levels exceeding 75 dB at any noise-sensitive land uses are a violation of the ordinance unless no technological methods exist to remain below this level. Various technological methods do exist to remain below this level, but have not been offered by the Project developer or the City. Moreover, even if such methods did not exist, the exceedence of 75 dB at any noise-sensitive land uses would remain a significant impact to those adjacent uses.

A mitigation measure adjustment has been suggested to erect a 10-foot high sound blanket at the eastern Picasso property line once a line of sight is established between the motel and any demolition activities. However, as the steel framing takes shape, the sound blanket will no longer provide any shielding such that the attachment of plywood sheets to the framing is recommended. While a well constructed ground-mounted sound blanket may be partially effective up to a 10-foot height, use of temporary plywood sheets above that height on and with regard to the upper building superstructure would likely not achieve effective attenuation because a sound wall must be contiguous and essentially air tight. Noteworthy also is that, even with regard to this incomplete sound attenuation measure, it is only on the east side of the Project site, not the north side, and thus would offer no mitigation to the apartment buildings across the alley immediately to the north.

We concur with the added vibration mitigation to restrict the operation of any heavy dozers or hoe rams to no closer than 15 feet of the eastern property line. Enforcement of this type of measure is, however, problematical in an active construction zone.

It is our continued professional opinion that a fair argument exists that construction activity impacts have not been fully mitigated to support the use of an MND for CEQA clearance for the proposed project. Similarly, the monolithic scale of the proposed project relative to its neighbors has impact potential that has been essentially ignored in the current MND. We feel that the preparation of a full EIR is clearly indicated.

EXHIBIT 3

HERMAN BASMACIYAN, P.E.

Traffic, Transportation, Parking
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September 15, 2014

Mr. Robert Silverstein
The Silverstein Law Firm, APC
215 North Marengo Avenue, 3rd Floor
Pasadena, CA 91101-1504

Subject: Proposed Picasso Brentwood Project

HB Proj. No. 131001

Dear Mr. Silverstein:

Per your request, I have prepared and attached a report which contains a discussion of unresolved traffic and parking matters associated with the proposed Picasso Brentwood Project. It is my understanding that you intend to use this information to support the appeal to the City of Los Angeles Planning and Land Use Committee. The report attached addresses long-term on-going matters as well as short-term effects during the construction period.

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.

My overall conclusion is that there are existing traffic operational problems in the vicinity of the Picasso Brentwood development that will worsen as traffic grows in general over time and when Picasso Brentwood traffic is added. Of primary concern to the Wilshire Motel is the traffic to be added in the alley that will serve as the only access for Picasso Brentwood. It is estimated that about 700 vehicles per day will use the east-west alley to travel to and from Picasso Brentwood. It is my recommendation that the unresolved traffic operational and potential safety matters be thoroughly studied by the /city staff prior to final approval of the proposed Picasso Brentwood project.

Please contact me if I can provide further details or clarification about any matters covered in this letter.

Sincerely,


Herman Basmacıyan, P.E.

**COMMENTS ABOUT TRAFFIC AND PARKING MATTERS
PERTAINING TO THE PROPOSED PICASSO BRENTWOOD PROJECT**

submitted for the consideration of the

**CITY OF LOS ANGELES PLANNING AND LAND USE COMMITTEE
September 14, 2014**

Introduction

Previously, I prepared and submitted to Mr. Robert Silverstein a report "Review of Traffic Study for the Proposed Picasso Brentwood Project" on November 15, 2013. Additional materials about the proposed development have become available since then, including a letter from Hirsch/Green that contains responses to my previous report. Considering all of the more recent and prior documents, I submit to you a discussion of the traffic and parking issues that remain unresolved. These issues, discussed in order subsequently, are:

- A. Traffic added to the east-west alley**
- B. Width of alley**
- C. Loading/unloading operations in the alley**
- D. Un-signalized intersections**
- E. Pedestrian/vehicular conflicts in Ralph's parking lot**
- F. Parking**
- G. Construction period matters**

A. Traffic added to the east-west alley

A total of approximately 700 daily trips will be added to the alley by the proposed project. This number is estimated on the basis of the original traffic study prepared by Hirsch/Green (August 2012) and the June 10, 2014 letter from Hirsch/Green to Mr. John Warfel. The computation of the daily trips is presented in Table 1 attached. There will be an impact on the alley based on added traffic.

To estimate the total of 700 vehicles per day, traffic from the existing retail uses on the project site is not deducted from the total because the buildings to be demolished are "vacant and non-functional" as described by Dale Goldsmith and Damon Mamalakis in their letter to the Planning and Land Use Committee, dated August 11, 2014, , and previously, in the November 8, 2013 letter from Dale Goldsmith to the Planning Commission. Traffic to and from vacant and non-functional uses is virtually non-existent, and it is not appropriate to deduct theoretical trips, when in fact, they are non-existent.

The City of Los Angeles does not have a methodology for assessing the traffic impacts of added traffic for alleys, but it has impact significance criteria for local/residential streets, presented in the table below

(excerpted from “Traffic Impact Analysis Report,” August 2012, Hirsch/Green, Page 66). In the absence of any other increased traffic impact assessment criteria for alleys, the use of the local/residential impact significance criteria is considered the most appropriate for this purpose.

Table 11
Local/Residential Street Significant Impact Criteria

Projected Future ADT (With Project)	Project-Related Increase in Future ADT
Less than 1,000	120 trips or more
1,000 to 1,999	12 percent or more
2,000 to 2,999	10 percent or more
3,000 or more	8 percent or more

Source:

LADOT Traffic Study Policies and Procedures, May 2012.

An increase of 700 daily trips to the existing traffic in the alley would be significant under any of the daily traffic volume ranges in the table. Even if the total traffic were split evenly, 50% east and 50% west, 350 trips added would be a significant impact. Any other split of the traffic would represent a greater impact either to the east or to the west of the proposed project.

While it is acknowledged that the impact criteria for local/residential streets take into consideration quality of life matters and not merely roadway capacity, many of the characteristics of local/residential streets exist in the east-west alley, such as pedestrian traffic, residential uses, and very narrow traveled way.

The increased traffic in the alley, especially added truck traffic, may also affect the pavement structurally. No information is presented about the pavement section and whether or not the pavement can withstand the loads to be imposed by the increase. In any event, the developer should be required to repair any damage to the pavement during the construction period. For the long term, the alley should be built in accordance with the City’s pavement design standards for a Commercial Alley.

B. Width of alley

The City of Los Angeles standard width for an alley is 20’. The east-west alley does not comply with this standard. The fact that the proposed project has dedicated 10’ half width along its frontage, does not solve the problem. The less-than-standard width now causes, and will continue to cause, blockages in the alley. The existing blockages will be worsened due to the vehicular traffic, including additional truck traffic, to be added by the proposed development, potentially affecting all traffic in the alley, and very importantly, emergency vehicle maneuverability and response times. Any blockages in the alley would present potential sight distance problems, especially to those motorists turning in and out of the Picasso Brentwood and other driveways.

C. Loading/unloading operations in the alley

Because the project's loading/unloading area is too small, both in width and length, any vehicle longer than about 20-25 feet would block the travel way in the alley to some extent. Many of the vehicles used for moving purposes cannot be accommodated in the loading/unloading area; neither can most furniture/appliance delivery trucks. Deliveries to retailers are made by trucks of various sizes and configurations, with or without trailers. Many trucks used for deliveries to the retailers cannot be accommodated within the loading/unloading area. Blockages due to loading/unloading activities at the Picasso Brentwood project potentially will affect motorists in the alley in general, and most importantly, emergency vehicle maneuverability and response times. Blockages in the alley would present potential sight distance problems for vehicles turning into and out of the Picasso Brentwood driveways, depending on the location of the blockage and the size and height of the vehicle.

It is stated on Page 10 of the letter dated June 10, 2014 from Hirsch/Green to John Warfel that the proposed project will not add a significant amount of service vehicles to the project. This assertion is counter-intuitive, considering that three existing "vacant and non-functional" retail uses will be replaced by vibrant retail uses plus 81 dwelling units. The 81 dwelling units will have installation and/or repair service needs for plumbing, TV sets, computers, cable/WiFi, washing machines, driers, refrigerators, dishwashers, etc. Most service calls take longer than 15 minutes, so parking in the 15-minute loading/unloading spaces on Wilshire Boulevard may not be an option. It is not appropriate to dismiss the increase in service vehicles as "not significant."

Moving trucks or vans can also be a source of possible blockages in the alley. Unlike retail leases which are generally multi-year, residential leases are shorter-term, typically year-to-year, with annual renewal options with the agreement of both the landlord and the lessee. Some residential leases can be as short-term as month-to-month, and some are seasonal (for example for the winter or for the summer months). So there could be frequent move-in move-out activity and potential blockages in the alley due to moving trucks.

D. Un-signalized intersections

The Traffic Impact Study Policies and Procedures of the City of Los Angeles Department of Transportation (LADOT) require that the impacts of added traffic be addressed only at signalized intersections. Per the Policies and Procedures, potential impacts at un-signalized intersections need not be addressed. On the other hand, under current conditions there are traffic operational problems, delays, and potential hazardous conditions at un-signalized intersections in the immediate vicinity of the Picasso Brentwood project. The lack of a requirement to analyze un-signalized intersections does not make the problems go away. Even if Picasso Brentwood might be adding a small amount of traffic at some locations, a number of traffic operational and potential safety issues exist at un-signalized intersections that could be and would be used by Picasso Brentwood traffic. Some of these problems exist now, even in non-peak periods, and will not get better when additional traffic, however small, is added by Picasso Brentwood. The un-signalized intersections with existing operational problems that would affect traffic either leaving or destined for Picasso Brentwood are discussed in the following paragraphs.

Traffic leaving Picasso Brentwood and destined to points east served by Wilshire Boulevard will need to follow a route that entails a left turn at one of several un-signalized intersections:

1. The east-west alley at Bundy Drive,
2. Goshen Avenue at Bundy Drive
3. The north-south alley at Wilshire Boulevard (just west of Ralph's)
4. Westgate Avenue at Wilshire Boulevard

The issues associated with each of these potential routes are discussed in the following paragraphs. For purposes of this discussion, total project vehicular trips are considered, rather than "net" because all Picasso Brentwood trips will use on-site parking accessed by the east-west alley, and because "The project will make a significant contribution to the community, replacing vacant, non-functioning commercial buildings with a vibrant mixed-use development." The quotation is from the letter from Dale Goldsmith and Damon Mamalakis to the Planning and Land Use Committee, dated August 11, 2014. (The same quote also appears in the November 8, 2013 letter from Dale Goldsmith to the Planning Commission.)

1. **Left turns at the intersection of the east-west alley at Bundy Drive** will be very difficult and potentially hazardous. Based on my personal observation between 1:20 and 1:45 PM on October 7, 2013, southbound traffic on Bundy Drive was backed up on the approach to Wilshire Boulevard, even during a non-peak period. The back-up routinely extended north past the alley and often as far as, and past, Goshen Avenue. With the long queues on South Bundy Drive, left turns from the alley onto Bundy Drive are very difficult and potentially hazardous due to impatient drivers taking chances. In addition to not being able to access the southbound through lane on Bundy Drive, traffic exiting from the alley cannot access the left turn pocket approaching Wilshire Boulevard, even when the pocket is empty or has few vehicles, because the pocket does not extend as far north as the alley. This problem will become worse when project traffic, however small, is added to existing and future traffic with ambient growth.
2. **At the intersection of Bundy Drive and Goshen Avenue**, also based on my personal observation between 1:20 and 1:45 PM on October 7, 2013, there was a long northbound queue on Bundy Drive starting just south of Goshen Avenue and extending northward towards Kiowa Avenue. This queuing makes left turns from Goshen Avenue onto Bundy Drive very difficult and presents traffic operational and potential safety hazards comparable to those discussed for the intersection of Bundy Drive and the alley, possibly worse because left-turning motorists will need to consider queues in both north and southbound directions. Such queuing, that exists now even during a non-peak time, would be expected to become worse as ambient traffic growth is added to existing traffic. Further investigation revealed that the northbound queuing problem is attributable to the all-way (4-way) stop sign at the intersection of Bundy Drive and Mayfield Avenue. Photographs taken on Oct. 25 and Nov. 12, 2013 (See **Exhibit 3** in my November 15, 2013 report), illustrate this queuing problem that has not been addressed in the environmental documentation for Picasso Brentwood.

3. **Left turns from the north-south alley just west of Ralph's onto Wilshire Boulevard** would be another route for project traffic to go east. The problem associated with this alternative route would be the difficulty of making left turns onto Wilshire Boulevard, especially during peak periods, potentially, equally or more difficult than a left turn from the east-west alley onto Bundy Drive. A variation of this route would be to make a right turn onto Wilshire Boulevard followed by a U-turn at Bundy Drive to go east. The variation would require crossing all westbound traffic on Wilshire Boulevard to get into the left-turn pocket to be able to make the U-turn. This maneuver would be very difficult especially during peak periods.
4. **The intersection of Wilshire Boulevard/Westgate Avenue** may emerge as the preferred left-turn point for traffic leaving Picasso Brentwood to go to major destinations such as the VA Health Center, I-405, UCLA, and other destinations to the east. Picasso Brentwood traffic would reach Westgate Avenue by traveling east in the alley (or Goshen Avenue) then turning right onto Westgate Avenue (first opportunity to turn off the alley) then left onto Wilshire Boulevard, where left (and right) turns are permitted. Additional left turns from Westgate Avenue onto Wilshire Boulevard would increase the potential for collisions at the intersection. There could be about 100 additional left turns per day, and about 10 in each of the morning and afternoon peak hours. A related operational and safety consideration is the presence of a marked crosswalk across Wilshire Boulevard about 170 ft. east of 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. These traffic operational and potential safety matters are not addressed in the environmental documentation.

An alternative to making left turns at Westgate Avenue would be to continue travel on the east-west alley to access Barrington Avenue, turn right, and then make a left turn at the signalized intersection of Barrington Avenue/Wilshire Boulevard. This route would entail additional travel on the east-west alley and potentially congestion and delay at the signalized intersection.

In summary, it is expected that the majority of traffic from the proposed project and destined eastbound on Wilshire Boulevard about 100 per day would use the east-west alley and South Westgate Avenue, since no better alternative appears to be available.

E. Pedestrian/vehicular conflicts in Ralph's parking lot

All Picasso Brentwood exiting the garage and turning left will need to travel through some portion of the Ralph's parking lot. Likewise, all traffic making a right turn into the Picasso Brentwood garage would have traveled through some portion of the Ralph's parking lot. Thus additional opportunities for vehicular/pedestrian conflicts will be created in the parking lot, most importantly in front of the store entrance. Since there will be a total of 700 to 750 total vehicular trips per day to and from Picasso Brentwood, the increase of vehicular traffic in the Ralph's parking lot will be substantial, consisting of a large percentage of the 700 to 750 daily Picasso Brentwood project. This issue has not received much

attention in the traffic impact analysis or any of the related documents. It is dismissed with the simple statement that Picasso Brentwood will add a small amount of traffic in the peak hours.

F. Parking

Picasso Brentwood will not provide on-site guest parking. It is unclear where visitors are expected to park. Is there an estimate of the number of visitor parking spaces that may be needed for 81 units? Will sufficient on-street parking spaces be available (unoccupied when needed) within reasonable proximity to accommodate the estimated Picasso Brentwood visitor parking? To what extent, if any, will shortages of parking space be created in the neighborhood?

G. Construction period

A number of construction-related issues remain unresolved. These are discussed in the following paragraphs.

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. LADOT defines the peak hours of traffic as 7:00 AM to 10:00 AM and 4:00 PM to 7:00 PM. Thus the LADOT is recommending that there should be no construction traffic in these two periods. On the other hand, the documentation leading to the final approval request for this project would allow construction in the hours of 7:00 AM to 6:00 PM on weekdays and 8:00 AM to 6:00 PM on Saturdays. Thus the recommendation of the LADOT seems to have been totally ignored.
2. Picasso Brentwood documentation contains very little information about the construction period activities. It is acknowledged that a lot of details will be worked out after project approval in a Traffic Management Plan and Worksite Traffic control Plan. However, these documents are prepared by the developer, the construction contractor, and their consultants and subcontractors. They are approved administratively by the City without public input or input from a potentially affected party. Thus, an aggrieved party has very little, if any, opportunity for relief. Some basic information should be available after several years of project planning and based on the developer's experience with other projects, including:
 - How much material will be excavated and exported -- cubic yards, or tons, or truck loads?
 - How long will excavation and export activities take?
 - To what location (s) will excavation material be transported?
 - How much concrete will be poured? From what location will concrete be brought to the site? If the specific location is not known, what are some options?
 - Will lane closures, or complete closure of the east-west alley be necessary, as stated in the letter dated June 10, 2014, from Ron Hirsch to John Warfel, page 11?
 - Will lane closures on Wilshire Boulevard extend to the frontage of the Wilshire Motel and how will this affect access to/from the Motel?

- Where will construction workers park? If not known specifically, what options are available?
- What provisions will be made to ensure that construction trucks will not park in the alley?

Summary

In summary, several traffic and parking matters remain unresolved, including some that are existing traffic operational and potential safety matters. These existing problems will get worse by the addition of ambient traffic growth over time and the addition of traffic to and from Picasso Brentwood. Further deliberation and careful review of these issues by the City prior to the final approval of the project could lead to solutions to eliminate the traffic operational problems and potential safety hazards. It is recommended that City Transportation Department staff be directed to review the traffic problems identified in this report and present to the Planning and Land Use Committee their thoughts and recommendations.

Table 1

TRIP ESTIMATE FOR PICASSO BRENTWOOD PROJECT

	Quantity	NUMBER OF TRIPS						
		Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Residential Trips								
Number of Residential Units for 4-parcel project (a)	101	718	11	44	55	34	19	53
Number of Residential Units for 3-parcel project (b)	81	576	9	35	44	27	15	42
0.5% Reduction for Affordable Units		3	0	0	0	0	0	0
15% Reduction for Transit		86	1	5	7	4	2	6
Subtotal: Trips for 81 Residential Units		487	7	30	37	23	13	36
Trips for Retail Uses								
Retail Sq. Ft. for 4- Parcel Project (a)	13,000	576	10	7	17	29	36	65
Retail Sq. Ft. for 3- Parcel Project (b)	7,745	343	6	4	10	17	21	38
5% Reduction for Internal Trips		17	0	0	1	1	1	2
15% Reduction for Transit Trips		51	1	1	2	3	3	6
10%Reduction for Pass-By Trips		34	1	0	1	2	2	4
Subtotal: Trips for 7,745 Sq. Ft. of Retail Uses		240	4	3	7	12	15	27
Total of Residential and Retail Trips (c)		727	12	33	44	35	28	63
Directional Orientation of Trips								
North	15%	109	2	5	7	5	4	9
South	20%	145	2	7	9	7	6	13
East	40%	291	5	13	18	14	11	25
West	25%	182	3	8	11	9	7	16

Notes:

All reduction and directional orientation percentages are the same as those used by Hirsch/Green in the Traffic Impact Analysis Report

(a) All numbers taken from Hirsch/Green Traffic Impact Study Report

(b) Trips estimated by reducing the original numbers in proportion to the reduction in the number of units

(c) No reduction is taken for existing uses on the property because they are "vacant and non-functional" as stated by Dale Goldsmith

EXHIBIT 4

Exhibit I: Guidelines for Noise Compatible Land Use

(Based on the Governor's Office of Planning and Research, "General Plan Guidelines", 1990. To help guide determination of appropriate land use and mitigation measures vis-a-vis existing or anticipated ambient noise levels)

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Ampitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

A = Normally acceptable. Specified land use is satisfactory, based upon assumption buildings involved are conventional construction, without any special noise insulation.

C = Conditionally acceptable. New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

N = Normally unacceptable. New construction or development generally should be discouraged. A detailed analysis of noise reduction requirements must be made and noise insulation features included in the design of a project.

U = Clearly unacceptable. New construction or development generally should not be undertaken.