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September 29, 2014

BY EMAIL AND HAND DELIVERY

The Honorable City Council
City of Los Angeles
200 North Spring Street, Room 395
Los Angeles, CA 90012

Sharon.gin@lacity.org

Re: Council File No. 14-0218; Case No. DIR-2012-2836-DB-SPR-CDO; ENV-2012-2837-MND

Honorable Councilmembers:

The Silverstein Law Firm on behalf of GE RealProp, LP submitted late comments regarding their CEQA appeal of the Picasso Brentwood mixed-use project to the PLUM Committee. Given the lateness of the comments, we were unable to respond to the comments at the PLUM Committee hearing on September 16, 2014. Attached are our responses: (1) Matrix Environmental Response Memorandum (September 29, 2014) regarding noise and (2) Hirsch/Green Transportation Consulting, Inc. Response (September 29, 2014) regarding traffic.

We respectfully request that the City Council uphold the City Planning Commission's adoption of the MND and deny the Appeal.

Sincerely,

Dale J. Goldsmith

cc: Naomi Guth, Department of City Planning

Attachments:
Matrix Environmental Response Memorandum (September 29, 2014)
Hirsch/Green Transportation Consulting, Inc. Response (September 29, 2014)

Matrix Environmental Response Memorandum (September 29, 2014)

September 29, 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 regarding the construction noise issues raised in the letter dated September 16, 2014 submitted by The Silverstein Law Firm (Silverstein letter), representing the Wilshire Motel (Appellant).[1] This letter was submitted on the day of the PLUM hearing. In particular, comments from Exhibit 2 of the Silverstein letter (memo from Hans Giroux of Giroux & Associates dated September 15, 2014) are addressed.

Construction Noise

The Silverstein letter questions whether potentially significant noise impacts have been adequately mitigated. The letter first maintains that a significant impact will occur if temporary construction noise levels exceed 75 dBA. As the Giroux memo admits, construction noise would be considered to be a significant impact "if it violates an adopted ordinance." LAMC Section 112.05 governs construction noise. It provides that noise levels may exceed 75 dBA "where compliance therewith is technically infeasible…. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the

[1] *Traffic responses are addressed separately in a memo prepared by Hirsch/Green Transportation Consulting, Inc., September 29, 2014.*

equipment."[2] Therefore, construction noise impacts will be less than significant even if they may exceed 75 dBA, provided that it is technically infeasible to reduce construction noise levels below 75 dBA.

As discussed in the July 23, 2014 Matrix memorandum, 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) was included to reduce the Project's construction noise levels to the extent feasible. As the mitigation measures in the MND were determined, at that time, to constitute the application of all 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. However, in response to comments by the Appellant regarding construction noise, dated February 4, 2014, further review of technically feasible mitigation measures was conducted. As a result, it was further recommended that the following mitigation measure be added to 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.

As concluded in the July 23, 2014 Matrix memorandum, 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 were warranted.

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[2] *LAMC Section 112.05.*

The Silverstein letter also suggests that additional technological methods may reduce the construction noise levels. However, no specific new mitigation measures are recommended for consideration. This letter merely recommends extending the acoustical sound blanket along the northern site boundary facing existing apartment buildings. Accordingly, the following additional language should be added after the fourth bullet of the additional noise measures adopted by the PLUM Committee:

- The10-foot-tall acoustical construction sound blanket shall also be extended along the entire northern construction boundary prior to performing any demolition activities.

In addition, it is argued that the temporary plywood sheets proposed as a noise barrier on upper construction framing would not be contiguous, thus reducing their effective attenuation. In response to this concern, the following additional language should be added after the third bullet of the additional noise measures adopted by the PLUM Committee to further stipulate that noise-mitigating plywood be placed to protect residences to the north and in a contiguous manner to avoid gaps:

- Temporary plywood sheets also shall be placed on framing facing north as building erection goes vertical to provide a noise barrier to the adjacent residences.
- Such temporary plywood sheets shall be placed contiguously to avoid gaps to provide a noise barrier to the adjacent properties.

With these mitigation measures in place as part of the suite of measures stipulated in Mitigation Measure XII-20, all known and effective technically feasible mitigation will be implemented. Nonetheless, although temporary and intermittent noise levels above 75 dBA may be experienced, primarily where the line-of-sight would not be interrupted, impacts are considered to be less than significant, pursuant to the applicable provisions of LAMC Section 112.05. Accordingly, ***construction noise impacts associated with the Project would be less than significant***.

It is also noted that the Silverstein letter misconstrues a correlation between noise limits provided in LAMC Section 112.05 (i.e., 75 dBA Leq) with unacceptable Community Noise Equivalent Levels (CNEL) noise levels provided in the Guidelines for Noise Compatible Land Use in the City's General Plan Noise Element. Leq, or equivalent continuous sound level, is the average acoustic energy content of a noise occurrence over a one hour time period. Whereas,

CNEL is a 24-hour average Leq with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. As proposed construction activities would not occur within the evening or nighttime hours, any comparison between the two noise descriptors is not meaningful. As such, the Silverstein letter's claim that the Project's construction noise levels would be "clearly unacceptable" per City guidelines is incorrectly based on a confusion between two different types of noise measurement.

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

Hirsch Green Transportation Consulting, Inc. Response (September 29, 2014)

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

September 29, 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,

This letter summarizes the results of our review of the traffic and access issues identified in the September 16, 2014 letter submitted by the Silverstein Law Firm on behalf of GE RealProp, LP regarding the City of Los Angeles' approval of the Mitigated Negative Declaration ("MND") prepared for the Picasso Brentwood mixed-use project ("Proposed Project" or "Project"), located 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). As you know, our firm prepared the traffic impact 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. Additionally, we have previously prepared detailed responses to many of the traffic issues noted in the current appeal, which are generally redundant to comments identified in previous submittals from the Silverstein Law Firm in this matter, including issues identified in a supplemental letter prepared by Mr. Herman Basmaciyan, P.E. (dated November 15, 2013 and attached to the Silverstein Law Firm's letter dated November 21, 2013), who was retained by the appellant to peer review our firm's traffic study for the proposed project, and to more general traffic-related comments contained in an additional Silverstein Law Firm letter dated February 4, 2014. Our responses to the traffic and access-related issues noted in the current letter are provided in the following pages. A copy of Mr. Basmaciyan's current comments (dated September 14, 2014), which is identified as "Exhibit 3" in the Silverstein Law Firm's current September 16, 2014 letter, is provided for reference in Attachment 1 of this document; the naming convention for our responses mirrors that of Mr. Basmaciyan's comments.

Responses to September 14, 2014 Basmaciyan Traffic Study Review Comments

Response to Comment "A" (Traffic Added to East-West Alley):

The Proposed Project trip generation estimates prepared by Mr. Basmaciyan for this comment, and which he also used for subsequent evaluations of the potential project-related traffic effects of the Project (which he wrongly asserts are based on the study our firm prepared), contain

several errors, and include numerous inappropriate assumptions. First, Mr. Basmaciyan identifies that the Proposed Project will generate approximately 700 daily trips, which he asserts should not be reduced by traffic generated by any of the existing uses on the project site, since such uses are currently "vacant and non-functional", and do not generate any existing traffic.

Mr. Basmaciyan estimates the potential trip generation for the Proposed Project by factoring the trip generation for the larger mixed-use project (108 residential units and 13,000 square feet of retail space) examined in our firm's original (August 2012) project traffic study, to approximate the number of trips that would be generated by the smaller Project approved by the City under the MND (81 residential units and 7,745 square feet of retail). He should have instead actually calculated the number of project trips directly using the appropriate Institute of Transportation Engineers ("ITE") trip generation rates. The methodology used by Mr. Basmaciyan introduces errors into Mr. Basmaciyan's trip estimates for the Project, identified in Table 1 of his comment letter as approximately 727 daily trips, including approximately 44 trips during the AM peak hour and approximately 63 trips during the PM peak hour. Table 1 of Mr. Basmaciyan's current comments also includes other more minor errors including addition, and discrepancies in the individual "inbound/outbound" trips versus the "total" trips, particularly during the AM peak hour.

For comparison, the actual trip generation for the approved Proposed Project, based on the correct use of the ITE trip generation rates, is expected to be approximately 705 daily trips, including approximately 42 trips during the AM peak hour and approximately 62 trips during the PM peak hour, as shown in Attachment 2 of this document, which itself is a copy of the Project trip generation estimates from our previous June 10, 2014 responses to Mr. Basmaciyan's November 15, 2013 comments. It should also be noted that while Mr. Basmaciyan's estimates of the Project's trip generation are not substantially different from those identified using the actual ITE trip generation rates, they do reflect an inaccurate approach to the assessment of the Project's potential trip generation that permeates the remaining evaluations and conclusions of the current appeal comments.

Further, as noted earlier, Mr. Basmaciyan asserts that the traffic generated by the existing uses on the Project site should not be deducted from the "gross" Project trip generation values, since these uses are no longer active. However, at the time the traffic study for the Proposed Project was prepared and the traffic counts used in that study were obtained, in early June of 2012, many of the on-site businesses were in operation, and as such, the traffic volume data utilized in the traffic study intrinsically includes these trips. Thus, the traffic baseline used in the Project traffic study appropriately includes the traffic generated by the existing site uses at the time of the study was originally prepared. Indeed, it would be an artificial baseline to use a point in time subsequent to the traffic study as the "existing" conditions, as the closure of the existing uses is a result of the entitlement process. Additionally, even under the current site operations levels, it is important to note that the entitlements for the on-site buildings still exist, and they could be reoccupied at any time without City action, and as such, continue to exhibit the potential to generate traffic. It is also of note that LADOT's current Traffic Study Policies and Procedures (dated "August 2014") allow for the use of "trip credits" associated with previous, but currently inactive, land uses to calculate the potential "net" trip generation for the Proposed Project. The

LADOT policy is based on the fact that in many cases, including this one, the inactivity of "existing" on-site uses is solely due to the pending entitlement application. It is an artificial and temporary condition that does not reflect either historic use or future use of the site should the Proposed Project not be built. The policy is intended to provide for an accurate and consistent baseline from which to measure a project's potential traffic impacts.

Therefore, while Mr. Basmaciyan contends that it is not appropriate to deduct the existing site activity traffic from the trips generated by the Proposed Project, the methodologies used in the project traffic study and as identified in our responses to the previous appeal comments are consistent with current City and LADOT traffic study and land use analysis policies. As a result, and as also shown in the previously-referenced Attachment 2 of this document, the Proposed Project approved by the City under the subject MND will actually result in a net trip generation of only approximately 545 daily trips, including approximately 19 net trips during the AM peak hour and approximately 20 trips during the PM peak hour.

Mr. Basmaciyan's traffic study review comments also include the application of LADOT's significance threshold criteria for local/residential street segments as the basis for his conclusions that significant Project-related impacts to the existing access alley will occur. However, although Mr. Basmaciyan correctly points out that the application of these criteria is not appropriate for alley impact evaluations for several reasons, he summarily dismisses these factors and applies the criteria anyway, concluding that the alley exhibits many of the characteristics associated with local/residential streets, such as residential uses (which do not exist adjacent to the "Ralph's" portion of the alley, which is the primary focus of his comments).

Nonetheless, LADOT's local/residential street segment impact criteria is not applicable to the portion of the alley adjacent to the Ralph's store, since the criteria are based on an evaluation of the total, 24-hour traffic additions to local/residential streets where nighttime traffic noise and congestion is an issue. These concerns are not present along the portion of the alley adjacent to the Ralph's store, and thus, the application of the LADOT local/residential street segment analysis criteria is inappropriate. Rather, concerns related to the additional traffic along this portion of the alley should be (and were appropriately) evaluated with respect to the potential interactions or conflicts between pedestrians walking between the Ralph's parking lot and the Ralph's store itself and potential Project-related traffic during the peak Project traffic periods. These evaluations were prepared and provided in our previous responses to Mr. Basmaciyan's November 15, 2013 traffic study comments. To reiterate those evaluations and their results, the net Project-related trips expected to use the alley in front of the Ralph's store would be a total of approximately five trips (10 westbound, reduction of five eastbound) during the AM peak hour, and 13 trips (reduction of two westbound, 15 eastbound) in the PM peak hour. Based on these levels of traffic, the Project approved in the MND will result, on average, in one net new trip in the alley in front of the Ralph's' store approximately every 12 minutes during the AM peak hour and about every 4½ minutes during the PM peak hour. These nominal peak Project-related traffic additions will not 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.

Mr. Basmaciyan also speculates, without providing any supporting evidence, that the potential Project-related traffic in the alley could affect the structural integrity of the alley pavement, especially due to added truck traffic. This is incorrect. The Proposed Project is primarily a residential project, with only a small amount of retail/commercial use (81 residential units, plus about 7,745 square feet of ground floor retail/commercial space), and as a result, the number of large trucks associated with the Project is expected to be nominal, and associated primarily with periodic Project resident moving activity. Additionally, two 15-minute loading zone spaces are located adjacent to the Project site along Wilshire Boulevard, and it is anticipated that more typical single-unit ("box") trucks providing delivery services to the residents and retail/commercial tenants of the Project will utilize these loading zones, as they are more convenient to access than accessing the back of the Project site via the alley. As a result, no substantial amount of new truck traffic in the east-west access alley fronting the north side of the Project site is anticipated as a result of the development of the Proposed Project, and no significant impacts to the pavement conditions in the alley are expected. It is also important to recall that the Proposed Project will be required by City ordinance to repair or replace any existing deteriorated or substandard pavement in the alley adjacent to the Project site to the satisfaction of the City.

Finally, it is important to note that LADOT approved the traffic analyses for a larger (108-unit, 13,000 square foot retail) Project that generated more trips (including in the alley) than the approved MND project. A copy of the LADOT approval letter is provided in Attachment 3.

Response to Comment "B" (Width of Alley):

Mr. Basmaciyan 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, as identified in the approved August 2012 traffic study, the half-alley adjacent to the Project site, 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 the east of the Project site, which exhibits a total width of between 15 and 17.5 feet, to its full design width are beyond the control of the Project. Mr. Basmaciyan further states that the Project-related improvements to the site-adjacent segment of the alley will not solve problems associated with existing blockages of the alley (although no examples, photographs, or frequency of occurrence of such blockages are provided), and that additional Project-related traffic, including truck traffic, could potentially impact emergency vehicle access through the alley, and that driver visibility for vehicles exiting the Project driveways on the alley will be compromised due to such blockages.

Each of these issues have been raised before, and all are based on mere speculation – no evidence has been submitted to document or establish the existence of these issues. Further, each of the comments has been previously, thoroughly, and fully addressed in the responses to Comment "G" in our June 10, 2014 letter review of Mr. Basmaciyan's November 15, 2013 letter. Specifically, the earlier response to Subcomment G.4 of Mr. Basmaciyan's 2013 comments

notes that, in response to 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 in the alley.

Additionally, the earlier responses to Subcomments G.5 and G.6 of Mr. Basmaciyan's previous comments, which identify concerns regarding potential impacts associated with the use of the alley for Project-related loading and delivery operations for those uses note that, while 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. As noted previously in Response to Comment "A", two 15-minute loading zone parking spaces are currently provided along the north side of Wilshire Boulevard near the eastern edge of the project site that can be used by larger vehicles (trucks). These on-street loading zone spaces are anticipated, in our expert opinion, to be preferred by delivery vehicles over the alley spaces, due primarily to their accessibility, and their use would not affect the operations of the alley.

Further, as described in the June 10, 2014 Response to Mr. Basmaciyan's Subcomment G.7, which 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, the approved (MND) Project's incremental traffic additions to the alley 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.

<u>Response to Comment "C" (Loading/Unloading Operations in the Alley):</u>

Comment "C" of Mr. Basmaciyan's September 14, 2014 traffic study comment letter is simply an expansion of previous comments asserting that the Project's loading area is too small, and that vehicles larger than 20 to 25 feet will "block the travel way in the alley to some extent", potentially effecting travel through the alley, including emergency vehicle access and/or sight distance for drivers exiting the Project's driveways. Mr. Basmaciyan further comments that the use of the 15-minute loading zones is inappropriate for residential-related activities such as service or repair needs for plumbing, electronics, cable/WiFi, and household appliances, which typically take longer than 15 minutes. However, the frequency of such activity is expected to be relatively nominal and sporadic, even for the proposed 81 residential units. Further, this comment does not recognize that the vehicles associated with such activity are typically standard vans, which are easily accommodated within the Project's on-site loading spaces, and would not, therefore, block the alley in any way.

Mr. Basmaciyan also supposes that, because the Proposed Project's residential units are apartments, moving activities will be more frequent than for condominium units, and therefore result in more move-in/move-out operations, resulting in increased potential for larger moving

truck blockages of the alley. This assertion is speculative at best, and due to the high quality of the proposed apartment units, resident turnover within the Proposed Project is anticipated to be similar to ownership-type residential developments. Finally, large trucks such as those typically used for moving activities can parallel park in the alley adjacent to the Project site, and still leave adequate width for vehicles to pass through the alley.

Response to Comment "D" (Un-signalized Intersections):

The issues identified in Mr. Basmaciyan's Comment "D" in his September 14, 2014 traffic study review are identical to those noted in Comment "E" of his previous (November 15, 2013) letter. These comments are thoroughly addressed in our previous responses (dated June 10, 2014) beginning on page 7 of that document (see Response to Comment "E"). No new issues or data concerning the previous comments is provided in the current appeal comment letter, and no further responses are necessary.

Response to Comment "E" (Pedestrian/Vehicular Conflicts in Ralph's Parking Lot):

See Response to Comment "A", specifically the second full paragraph on page 3 of this letter. Again, Mr. Basmaciyan asserts that the Proposed Project will result in a "substantial" increase in traffic along the portion of the alley adjacent to the Ralph's store and parking lot, and discounts the removal of traffic associated with the existing (and/or prior) site uses. However, as noted earlier in our Response to Comment "A", actual peak hour traffic additions to this segment of the alley will be nominal, at a total of approximately five net trips during the AM peak hour and approximately 13 net trips during the PM peak hour; Project-related traffic additions to this portion of the alley are expected to be lower during other ("off-peak") times of the day. Therefore, despite Mr. Basmaciyan's assertion that potential traffic and/or pedestrian impacts to the alley adjacent to the Ralph's store have been "dismissed", the potential traffic impacts to this segment of the alley have been thoroughly analyzed, and as described in detail in the preceding responses, and previously in our June 10, 2014 response letter, the nominal additional traffic in the alley due to the Proposed Project will occur relatively infrequently (one new vehicle approximately every 4 ½ to 12 minutes during the PM and AM peak hours, respectively), and as such, is not expected to result in any traffic, access, or pedestrian-related impacts to that facility.

Response to Comment "F" (Parking):

This comment states that no residential on-site guest parking is provided by the Project, and expresses concerns regarding potential on-street parking impacts in the residential neighborhoods surrounding the Project site. Based on the applicable City Zoning Code parking requirements for developments providing inclusive low-income or "affordable" housing units, the proposed 81-unit Project will require a total of approximately 88 parking spaces (calculated at 1.0 space each for the total of 74 "studio/efficiency" and one-bedroom units, and 2.0 spaces for each of the seven two-bedroom units), and will provide a total of approximately 89 on-site parking spaces. It should be emphasized that the City's Zoning Code does not require the provision of residential guest parking for such projects. However, the Proposed Project will also

provide approximately 30 on-site retail/commercial parking spaces, which will be made available as residential guest parking in the evenings when the retail/commercial uses are closed. This amount of parking equates to approximately 0.38 spaces per residential unit; typical guest parking for residential projects that do not provide inclusive affordable housing units is generally provided at a ratio of between 0.25 and 0.50 spaces per unit (although, again, not required by the City Zoning Code). Therefore, the use of the Project's retail/commercial parking spaces for residential guest parking during evening and overnight periods is expected to be adequate to serve the Proposed Project's residential guest parking needs without resulting in any significant off-site parking encroachment into the nearby residential streets or commercial parking areas.

Response to Comment "G" (Construction Period):

This comment reiterates the commenter's concerns expressed previously in Comment "H" of the November 15, 2012 comment letter regarding the perceived lack of information or specifics related to the Proposed Project's construction-related activities and potential impacts. These concerns are fully addressed in the Response to Comment "H" in our previous June 10, 2014 letter, which indicates that, as is required by the City of Los Angeles, a detailed construction Traffic Management Plan ("TMP"), and Worksite Traffic Control Plan ("WTCP") will be required for the Proposed Project. The TMP will identify 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, while the WTCP 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). As noted in our June 10, 2014 responses, both the TMP and the WTCP 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.

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

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)

Prepared by Herman Basmaciyan, P.E.

HERMAN BASMACIYAN, P.E.
Traffic, Transportation, Parking
Expert Witness and Consulting Services
701 Marguerite Avenue
Corona del Mar, CA 92625
Tel: 949-903-5738
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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 Basmaciyan

Herman Basmaciyan. 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 COMMIITTEE
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 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

ATTACHMENT 2

Picasso Brentwood Project

Approved MND (Three-Parcel) Project Trip Generation Estimates

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***

ATTACHMENT 3

Picasso Brentwood Project
LADOT Assessment Letter
(October 16, 2012)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL MEMORANDUM

12029-12041 Wilshire Blvd.
DOT Case No. WLA12-100318

DATE: October 16, 2012

TO: Karen Hoo, City Planner
Department of City Planning

FROM: Mohammad H. Blorfroshan, Transportation Engineer
Department of Transportation

SUBJECT: **Traffic assessment for the proposed mixed-use project, The Picasso, at 12029-12041 Wilshire Boulevard**

Pursuant to the West Los Angeles Transportation Improvement and Mitigation Specific Plan Ordinance No. 171,492 (WLA TIMP), the Department of Transportation (DOT) has completed the traffic assessment of the proposed mixed-use project at 12029-12041 Wilshire Boulevard. This traffic assessment is based on a traffic impact assessment prepared by Hirsch/Green Transportation Consulting, received by DOT on September 12, 2012. After a careful review of the pertinent data, DOT has determined that the traffic study adequately describes the project-related impacts of the proposed development.

Project Description

The project site is currently occupied by 21,414 square feet of office space and 1,044 square feet of retail area. The project proposes to construct a new mix-use development consisting of 108 apartment units and approximately 13,000 square feet of retail space. The proposed project is anticipated to be fully built out and occupied by the year 2014.

Discussion and Findings

The project is expected to create a net increase of 789 daily trips, a net increase of 30 a.m. peak hour trips, and a net increase of 36 p.m. peak hour trips. The trip generation estimates are based on rates from Appendix "A" of the WLA TIMP and formulas published by the Institute of Transportation Engineers (ITE) Trip Generation, 8th Edition, 2008. The attached table, **Attachment A**, lists the trip generation results.

DOT has determined that the proposed project will not have significant traffic impacts at any of the intersections studied. **Attachment B** summarizes the volume-to-capacity (V/C) ratios and levels of service (LOS) at the study intersections.

Project Requirements

In response to the findings of the traffic study, DOT recommends that the following project requirements be adopted as conditions of project approval. Furthermore, these requirements must be completed and/or guaranteed prior to the issuance of any building permits for the proposed project.

A. Application Fee
Pursuant to Section 4.D of the WLA TIMP, the applicant shall submit $500.00 for the application/traffic study review fee. This fee was paid on September 12, 2012.

B. Covenant and Agreement
Pursuant to Section 4.B of the WLA TIMP, the owner(s) of the property must sign and record a Covenant and Agreement prior to issuance of any building permit, acknowledging the contents and limitations of this Specific Plan in a form designed to run with the land.

C. Highway Dedication and Physical Street Improvements
Pursuant to Section 4.E.2 of the WLA TIMP, and in order to mitigate potential access and circulation impacts, the applicant may be required to make highway dedications and improvements. The applicant shall consult the Bureau of Engineering (BOE) for any additional highway dedication or street widening requirements.

D. Pedestrian Connectivity
The applicant shall consult with the Department of City Planning for any additional requirements pertaining to pedestrian walkability and connectivity, as described in the Walkability Checklist.

E. Construction Impacts
DOT recommends that a construction work site traffic control plan be submitted to DOT's Western District Office for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours.

F. Site Access and Internal Circulation
This determination does not include approval of the project's driveways, internal circulation and parking scheme. Adverse traffic impacts could occur due to access and circulation issues. The applicant is advised to consult with DOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site/driveway plans, at a scale of at least 1"

= 40', separately to DOT's WLA/Coastal Development Review Section at 7166 West Manchester Avenue, Los Angeles 90045 as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety.

DOT Assessment Appeal Process

Pursuant to Section 8.A of the WLA TIMP, an applicant or any other interested person adversely affected by the proposed project who disputes any determination made by DOT pursuant to this Ordinance may appeal to the General Manager of DOT. This appeal must be filed within a 15 day period following the applicant's receipt date of this letter of determination. The appeal shall set forth specifically the basis of the appeal and the reasons why the determination should be reversed or modified.

If you have any questions, please feel free to call Kevin Minne of my staff or me at (213) 485-1062.

MB:km

Attachments

cc: Whitney Blumenfeld, Norman Kulla, Len Nguyen, Eleventh Council District
Jay Kim, Sean Haeri, Rudy Guevara, DOT
David Weintraub, DCP
Mike Patonai, Anthony Munoz, BOE
Ron Hirsch, Hirsch/Green Transportation Consulting, Inc.

Attachment A
Project Trip Generation

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							
108 -unit Apartment (including 11 low-income units)	718	11	44	55	34	19	53
(Less 0.5% Low-income Unit Adjustment)	(4)	0	0	0	0	0	0
(Less 15% Transit Utilization)	(107)	(2)	(6)	(8)	(5)	(3)	(8)
Subtotal Proposed Apartment Trips	607	9	38	47	29	16	45
13,000 sq. ft. Specialty Retail	576	10	7	17	29	36	65
(Less 5% Internal Project Capture)	(29)	(1)	0	(1)	(1)	(2)	(3)
(Less 15% Transit Utilization)	(82)	(1)	(1)	(2)	(4)	(5)	(9)
(Less 10% Pass-by Trips)	(47)	(1)	0	(1)	(2)	(3)	(5)
Subtotal Specialty Retail Trips	418	7	6	13	22	26	48
Total Net Project Trips	*1,025*	*16*	*44*	*60*	*51*	*42*	*93*
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
12041 Wilshire Boulevard							
4,356 sq. ft. Office (12041 Wilshire Boulevard)	48	6	1	7	2	10	12
(Less 15% Transit Utilization)	(7)	(1)	0	(1)	0	(2)	(2)
Subtotal Existing Office Trips	41	5	1	6	2	8	10
485 sq. ft. AT&T Store	21	1	0	1	1	1	2
(Less 15% Transit Utilization)	(3)	0	0	0	0	0	0
(Less 10% Pass-by Trips)	(2)	0	0	0	0	0	0
Subtotal Existing AT&T Store Trips	16	1	0	1	1	1	2

Attachment A (cont'd)
Project Trip Generation

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
Less Existing Development (continued)							
244 sq. ft. Hair Salon	11	0	0	0	0	1	1
(Less 15% Transit Utilization)	(2)	0	0	0	0	0	0
(Less 10% Pass-by Trips)	(1)	0	0	0	0	0	0
Subtotal Existing Hair Salon Trips	8	0	0	0	0	1	1
315 sq. ft. Tailor/Alterations Shop	14	0	0	0	1	1	2
(Less 15% Transit Utilization)	(2)	0	0	0	0	0	0
(Less 10% Pass-by Trips)	(1)	0	0	0	0	0	0
Subtotal Existing Tailor/Alterations Shop Trips	11	0	0	0	1	1	2
Total Existing 12041 Wilshire Trips	76	6	1	7	4	11	15
Total Existing Site Trips (12029 - 12041 Wilshire)	*236*	*26*	*4*	*30*	*12*	*45*	*57*
Total Net New Project Site Trips	***789***	***(10)***	***40***	***30***	***39***	***(3)***	***36***
Total Net New Project Trips at Adjacent I/S	***832***	***(9)***	***40***	***31***	***41***	***0***	***41***

Attachment B

Critical Movement Analysis Summary
Existing (2012) and Future (2014) Without and With Project Conditions

Int. No.	Intersection	Peak Hour	Existing (2012)					Future (2014)				
			Without Project		With Project			Without Project		With Project		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact
1	Wilshire Boulevard	AM	0.515	A	0.514	A	-0.001	0.555	A	0.554	A	-0.001
	and Centinela Avenue	PM	0.624	B	0.626	B	0.002	0.685	B	0.687	B	0.002
2	Wilshire Boulevard	AM	0.814	D	0.820	D	0.006	0.967	E	0.974	E	0.007
	and Bundy Drive	PM	0.921	E	0.930	E	0.009	1.045	F	1.054	F	0.009
3	Wilshire Boulevard	AM	0.334	A	0.334	A	0.000	0.374	A	0.374	A	0.000
	and Brockton Avenue	PM	0.406	A	0.408	A	0.002	0.443	A	0.445	A	0.002
4	Texas Avenue	AM	0.620	B	0.619	B	-0.001	0.672	B	0.671	B	-0.001
	and Bundy Drive	PM	0.588	A	0.591	A	0.003	0.632	B	0.635	B	0.003