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October 21, 2016

VIA ELECTRONIC MAIL

Councilmember Jose Huizar, Chair
Planning and Land Use Management Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Re: 8150 Sunset Blvd Appeal (VTT-72370-CN-2A, ENV-2013-2552-EIR, CPC 2013-2551-MCUP-DB)

Dear Members of the Planning and Land Use Management Committee:

As you know, the Laurel Canyon Association ("LCA") has filed an appeal with regard to the 8150 Sunset Blvd Project ("Project"). LCA is particularly concerned with the Project's impacts on traffic along Laurel Canyon Boulevard. We have commissioned an expert report from Allyn Rifkin, a professional engineer who previously worked for the City for over 30 years, to demonstrate what we believe are major flaws in the environmental analysis conducted for the Project. This report is attached as **Exhibit A**.

For example, the traffic study conducted for the Project stated that the intersection of Laurel Canyon Boulevard and Hollywood Boulevard was a "Level of Service A," which means a vehicle can pass through the intersection during peak traffic times in a single light cycle. Any resident in the area who has used Laurel Canyon Boulevard during the evening rush hour can attest to the fact that this simply is not accurate. We believe – and our expert has confirmed – that there are feasible mitigation measures that have not been fully evaluated. These mitigation measures would reduce the Project's impact on the environment encouraging people to use public transit and walk thereby reducing the number of cars on the road.

LCA believes that the following mitigation measures should be evaluated:

- Improve transit connections by improving bus stop waiting areas (especially at Kirkwood Drive and at Lookout Mountain Avenue) in the Canyon and improving the frequency of transit service (MTA Bus Line #218). Further, evaluation of crosswalk improvements at Kirkwood Drive and Laurel Canyon Boulevard.

- Reduce Laurel Canyon Boulevard bottlenecks by implementing traffic controls that would discourage use of Little Laurel Canyon Boulevard by traffic commuters.

- Implement emergency traffic evacuation plans as recommended by the Los Angeles Fire Department.

- Develop a list of pedestrian safety improvements in Laurel Canyon to encourage walking (for example, new sidewalks along Laurel Canyon Boulevard and Laurel Canyon Road)

- Noise Mitigation Measures along median between Laurel Canyon Boulevard and Laurel Canyon Road (e.g. landscaping).

- Carpool Programs/Shuttle Programs/Vouchers to and from public transit hubs (such as redline station at Hollywood and Highland)

- Use of Traffic Control Officers at Key Intersections

- Improvements along Laurel Canyon Boulevard (e.g. measures to prevent dirt from falling onto road thereby causing safety hazard, repaving certain sections, etc.)

- Traffic Calming Measures within community to discourage cut-through traffic (e.g. specialized stop signs, speed bumps, etc).

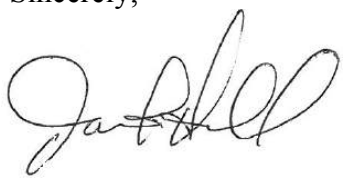
- Local Bus Service to transport children to/from Wonderland Avenue Elementary School

LCA also strongly believes that the height of the main tower should be reduced to 150 feet. This is the only feasible way to reduce the density and thereby reduce the traffic impacts on Laurel Canyon Boulevard.

Please know that LCA is not adverse to responsible development. However, we also strongly believe that the burdens associated with the redevelopment of the property should not fall on the backs of hillside residents. All available mitigation measures should be evaluated and implemented for a project of this size and scope.

I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

EXHIBIT A

Allyn D. Rifkin, PE
Rifkin Transportation Planning Group

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October 20, 2016

Councilmember Jose Huizar, Chair
Planning and Land Use Management Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Peer Review of Traffic and Circulation Issues - Draft EIR for the Proposed 8150 Sunset Boulevard (Sunset/Crescent Heights) Mixed Use Project Case No. ENV-2013-2552-EIR

Dear Mr. Hall:

This letter is a summary of my comments on the sections of the Draft Environmental Impact Report (DEIR) for the proposed project as it applies to Laurel Canyon Boulevard traffic impacts. I reviewed the DEIR Chapter 4.J – Environmental Impact Analysis – Transportation and Circulation (66 pages) and Appendix H – Traffic and Parking (724 pages). The length and complexity of those documents should be justification for an extended review period. Within the time constraints I have not been able to do an extensive review and may have additional comments to make at future review points to this project. In summary, there are questions regarding the present analysis that would require additional study and a re-circulation of the DEIR.

I have an extensive background in traffic impact analysis. For your information a copy of my resume and qualifications to conduct this review is attached as EXHIBIT 1. I have worked over 30 years with the City of Los Angeles Department of Transportation, including the Chief of the Transportation Planning Bureau which conducts the review of all development related traffic analyses within the City. I am registered in the State of California as Professional Engineers (PE) both in Civil and Traffic Engineering.

To summarize, traffic impacts to Laurel Canyon Boulevard are not analyzed because of the erroneous conclusions about Level of service (LOS) at Hollywood Boulevard and Laurel Canyon Boulevard – the only Laurel Canyon Boulevard intersection evaluated in the traffic study. Without a significant impact at that intersection, the traffic analysis implies that no further study of Laurel Canyon Boulevard would be warranted.

1. Existing Level of Service (LOS)

The existing LOS at Hollywood/Laurel Canyon is reported as LOS A for both the morning (AM) and evening (PM) peak hours (see Table 4.J-4a, page 4.J-45 of the DEIR). This calculation conflicts with personal experience and observation of the existing traffic conditions. Observations during the peak hours reflect conditions more similar to LOS E or F.

Possibilities for the errant information could be:

(a) Faulty traffic counts. The traffic counts could have been taken on a day when some unusual traffic conditions were evident. Unfortunately, copies of actual traffic count data (reported as being in Appendix C) have not been provided in the public record. So there is no reasonable method to check this concern.

(b) Up-stream congestion. More severe bottlenecks on Laurel Canyon Boulevard to the north often result in congestion backing onto the Hollywood intersection. This is not unusual in the afternoon where the merging of "little" Laurel Canyon into Laurel Canyon Boulevard results in a regular bottleneck. The up-stream congestion ultimately restricts the flow of traffic through the Hollywood intersection, leading to a lower than expected traffic volume.

At a recent community meeting with the Los Angeles Fire Department (LAFD) the most significant traffic bottlenecks that would affect downstream traffic were identified as part of discussions of the need for a traffic evacuation plan for the Laurel Canyon. EXHIBIT 2 is a copy of a map showing those locations.

(c) Wrong assumptions for capacity calculations. The intersection of Hollywood/Laurel Canyon is a complex intersection with the west leg of Hollywood Boulevard off set from the east leg. To assure safe movements at this intersection, the traffic signal timing controls are more complex than assumed. EXHIBIT 3 is an image of an LADOT PM peak hour capacity calculation sheet for this intersection that was included in the traffic study.

The first adjustment was to treat this intersection as a 3-phase intersection, reflecting the south-bound left turn arrow. The work sheet errantly does not indicate that the north-south direction as the chosen extra left turn phase. Thus the input to the worksheet indicating the existing "overlap" phase for the westbound right turn is ambiguous as to which phase the right turn "overlaps" and thus does not reflect the accurate analysis of capacity utilization. The assumption of a 3-phase intersection without specification of the direction (as illustrated on this worksheet) analyzes traffic impacts with a discount of intersection capacity of only 5 percent, from 1500 vehicles per hour to 1425 vehicles per hour. A much larger discount should be analyzed.

These errant assumptions are replicated in the evaluation of project impacts for with and without the proposed project scenarios.

2. Project Trip Distribution

EXHIBIT 4 is an image of the assumed geographic distribution of project related trips. Only 15% of project trips are assumed to come from and go to the north. This is an important assumption because all of the northerly trips are assigned to Laurel Canyon Boulevard. Based upon the DEIR assumed PM

peak hour trips from the project (Table 4.J-3) – 15% of 216, or only 32 vehicles per hour are assumed to be added to Laurel Canyon Boulevard in the PM peak hour.

Neither the DEIR nor the traffic study documents the source of this assumption and there is no basis to assess the reasonableness of this assumption.

3. Trip Generation

The Trip Generation analyses utilize a number of discounts from a multitude of assumptions (page 4.J-17). These discounts are not applied consistently to the existing use project, leading to an over-estimate of vehicle trips for the existing development and an under-estimate of the net new vehicle trips for the proposed project. The result of these differing assumptions results in a significant underestimate of the number of vehicle trips and thus would affect the conclusions regarding traffic impacts.

The most glaring errant assumption relates to internal trip discounts between various uses in the proposed shopping center. Tables 2a and 2b of the Traffic Study reveal the "parsing" of various proposed uses in the shopping center and the application of different assumptions for those uses. The reality is that uses within a shopping center change over the life of the project. The analysis should have used generalized trip rates for shopping center. The ITE Trip Generation Manual (9th Edition) describes what may be expected in a Shopping Center (Land Use Code 820) according to data contained in there data base (see EXHIBIT 5). Surveys of vehicle trips from those projects already include the "internal" discounts assumed in the DEIR analysis. Treating both the shopping center components for the existing and the proposed projects equally without "parsing" out individual components is illustrated in my independent trip generation analysis (EXHIBIT 6), utilizing the vehicle trip rates from ITE Land Use Code 820. The differences in estimated vehicle trips are 1,674 daily, 219 am peak hour, and 38 pm peak hour.

Because the existing shopping center is currently occupied, an opportunity exists to validate the magnitude of these differences in assumptions. The applicant should be requested to provide a survey of the existing shopping center vehicle trip generation and report these in a document for re-circulation.

An additional discount that is provided in the DEIR analysis is an assumed discount of 0.6% for "affordable" units. The documents provide no evidence that occupants of affordable units travel less frequently than market rate units. This evidence should be included in a revised document.

Finally, this project is presented as a unique architectural project designed by the world renowned architect, Frank Gehry. Residents in this portion of the Sunset Boulevard Corridor as well as in Laurel Canyon are significantly impacted by tour buses which seek to bring Hollywood tourists to significant sites. There is sufficient public testimony to suggest that the trip generation of the project should account for this unique attractive feature of the project.

All of the above differences are reflected in the number of vehicle trips added to Laurel Canyon Boulevard during the AM and PM peak hours.

4. Related Projects

The DEIR lists a number of proposed development projects in the vicinity of the proposed project that may affect future traffic. EXHIBIT 7 is a map showing the locations of the projects assumed in the

traffic study. The list does not reflect any projects north of Hollywood Boulevard. There are a number of residential projects in the Laurel Canyon area (see EXHIBIT 8) that individually would not impact future traffic congestion, but would most certainly warrant an analysis of cumulative impacts.

5. Construction Traffic Management

EXHIBIT 9 shows the recommended haul routes for removal of material from the proposed development site. It is noted that the developer does not propose to use Laurel Canyon Boulevard for construction haul routes. Again, as described earlier, there are a number of related projects in the Laurel Canyon Boulevard Corridor that would generate substantial truck trips. For example, EXHIBIT 8 shows an expected 233 truck trips in the Canyon. Thus, it is imperative to minimize this new project truck trips during its construction period to protect circulation on Laurel Canyon Boulevard and particularly to ensure the safety of increased school bus traffic to the proximate magnet schools. It is requested that prohibition of construction truck traffic from Laurel Canyon Boulevard be codified as a requirement in the conditions of approval.

6. Pedestrian and Transit Impacts

There are a number of deficiencies in the existing improvements along Laurel Canyon Boulevard that affect pedestrian safety and access to the one existing transit service (MTA Bus Line #218) along the Boulevard. Bus stop facilities at Lookout Mountain Road and at Kirkwood Drive are particularly substandard. These inadequacies and the developer possible nexus to mitigate these problems were not evaluated because of the decision not to evaluate traffic circulation issues along Laurel Canyon Boulevard.

7. Updated Mobility Element for the City of Los Angeles.

The City of Los Angeles Mobility Plan 2035 (MP 2035), adopted on January 20, 2016, is the current standard for consistency with the City's Circulation Element of the General Plan. This document establishes new street designations and re-classified each of the City's arterial streets and in a "complete street" policy framework. The Mobility Plan 2035 recognizes that streets serve a variety of purposes and revised improvement standards to address these needs in a coordinated fashion. Thus pedestrian, bicycle, transit and vehicle priorities are laid out for each street in the City. The City has delineated Laurel Canyon Boulevard as an "Avenue II". The description of Laurel Canyon as a "Secondary Highway" (see page 4J-5 of the DEIR) is out-dated and misleading as to the City of Los Angeles anticipated standards for this important route. There is no discussion regarding the inadequacy of the existing improvements on Laurel Canyon Boulevard, in particular as to requirements for sidewalks, as being inconsistent with the City's Circulation Element.

8. Project Traffic Mitigation

The discussion above leads me to conclude that the project will have significant traffic impacts. There is a need to reduce the project impact by reducing the number of automobile trips to and from the project. One alternative is to reduce the size and density of the project. Other possibilities to reduce automobile trips would include physical improvements to public transit connections as well as bicycle and pedestrian connections.

Specific to Laurel Canyon Boulevard traffic impacts the following traffic mitigations are suggested:

a. Improve transit connections by improving bus stop waiting areas (especially at Kirkwood Drive and at Lookout Mountain Avenue) in the Canyon and improving the frequency of transit service (MTA Bus Line #218).

b. Reduce Laurel Canyon Boulevard bottlenecks by implementing traffic controls that would discourage use of Little Laurel Canyon Boulevard by traffic commuters.

c. Implement emergency traffic evacuation plans as recommended by the Los Angeles Fire Department.

d. Develop a list of pedestrian safety improvements in Laurel Canyon to encourage walking.

The aforementioned mitigations measures are non-exhaustive. The City should analyze all feasible mitigation measures in a comprehensive study.

In conclusion, there are a number of traffic and circulation issues relating to Laurel Canyon Boulevard that have inadequate analysis. It is my opinion that the Traffic Study needs to be corrected and the additional analysis should be re-circulated in a revised DEIR.

If there are any questions regarding the above comments, please do not hesitate to contact me.

Sincerely,

s/Allyn D. Rifkin, PE

EXHIBIT – 1

Allyn Rifkin, P.E.
Experience and Qualifications

Mr. Rifkin has over 30 years experience in the field of transportation engineering and planning. Included in that experience are assignments in both the private and public sectors, ranging from consultant for developers to research for the Automobile Club of Southern California. Until recently, he was the Chief of the Los Angeles Department of Transportation's Bureau of Planning and Land Use Development, responsible for managing a staff of 38 professionals and serving as the key department liaison between the development community and City Council on traffic mitigation and transportation planning issues. He supervised the completion of numerous project EIRs for the City of Los Angeles. His latest projects focused on transit oriented development along various rail alignments in the Los Angeles area. As a private consultant, Mr. Rifkin assisted the Los Angeles Community Redevelopment Agency in a "complete streets" initiative; the Los Angeles City Planning Department in its revision to the City's Mobility Element of the General Plan, the Eagle Rock neighborhood in the formation of the Colorado Boulevard Pilot Community Parking program and County Supervisor Yaroslavsky in the initial proposal to convert Olympic and Pico Boulevards into a one-way pair.

Professionally, Allyn is active in the Urban Land Institute (ULI) and the Institute of Transportation Engineers (ITE), and has served as the president of the ITE'S largest Chapter of ITE, the Southern California Chapter, with over 1,100 members. In addition to serving on the ITE National Transit and Transportation Planning committees, he has been instrumental on national steering committees for the ITE Trip Generation Committee and the Urban Goods Movement Committee. He has lectured extensively on the topics of traffic impact mitigation and on neighborhood traffic controls.

His college education began with a B.S. in Systems Engineering at UCLA and led to an M.S. in Transportation Engineering at Northwestern University. Rifkin is nationally recognized for his expertise in travel demand forecasting. His more recent work has involved traffic plans to relieve congestion in various hot spots of development in Southern California including the South Coast Plaza area of Orange County, Downtown Los Angeles, Westwood, the LAX Transportation Corridor (the initial area in Los Angeles to adopt a traffic impact mitigation fee), and Warner Center.

He was involved in the creation of five transportation trust funds with current balances exceeding $23 million for transportation improvements. In his role as mediator of development traffic impact Mr. Rifkin launched a neighborhood traffic safety program currently exceeding $1.5 million in neighborhood traffic controls and negotiated pedestrian safety mitigations from the Los Angeles Unified School District.

EXHIBIT 2
LAUREL CANYON BOTTLENECKS

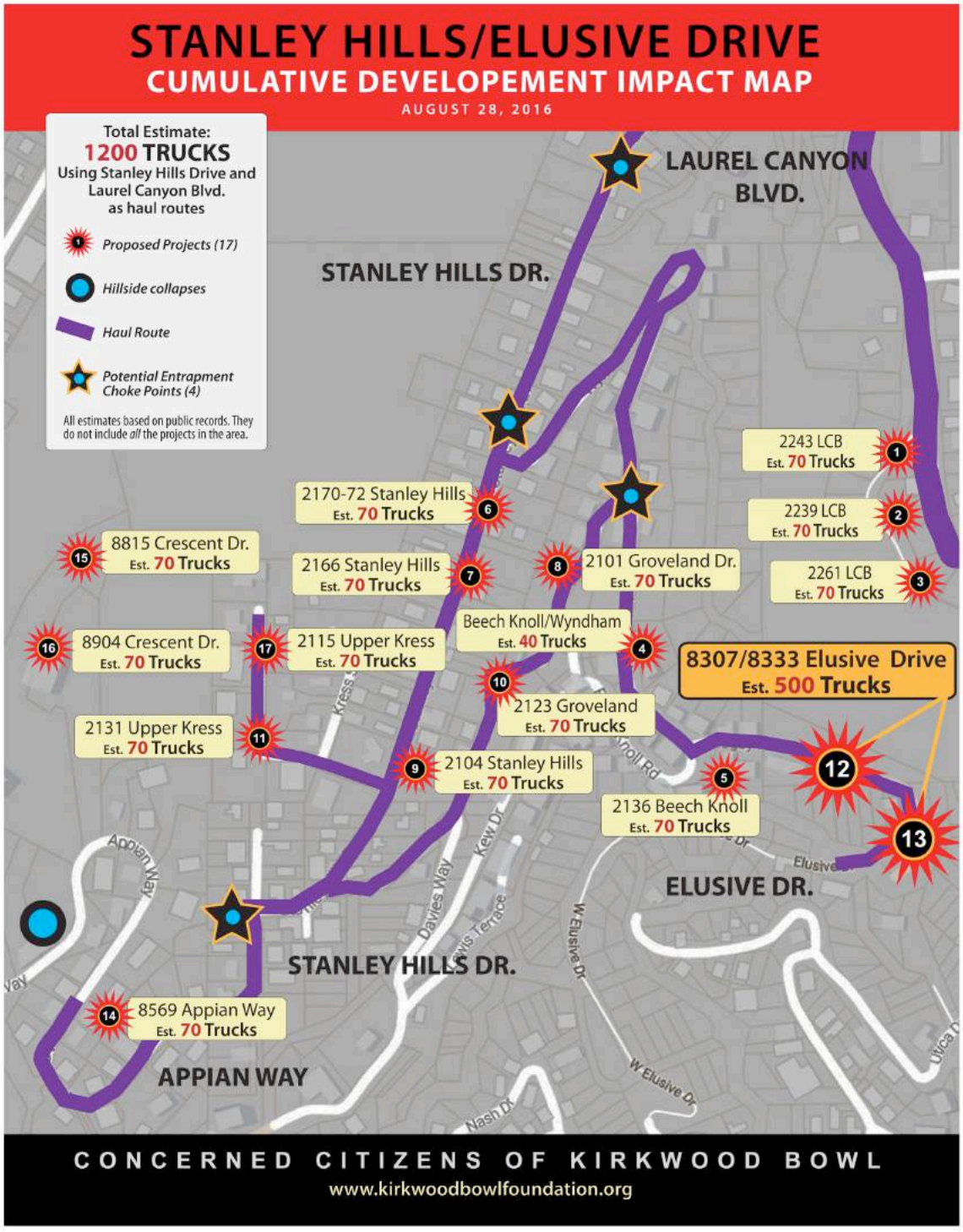

EXHIBIT 3

LADOT WORKSHEET FOR CMA EVALUATION OF HOLLYWOOD AT LAUREL CANYON
PM PEAK HOUR

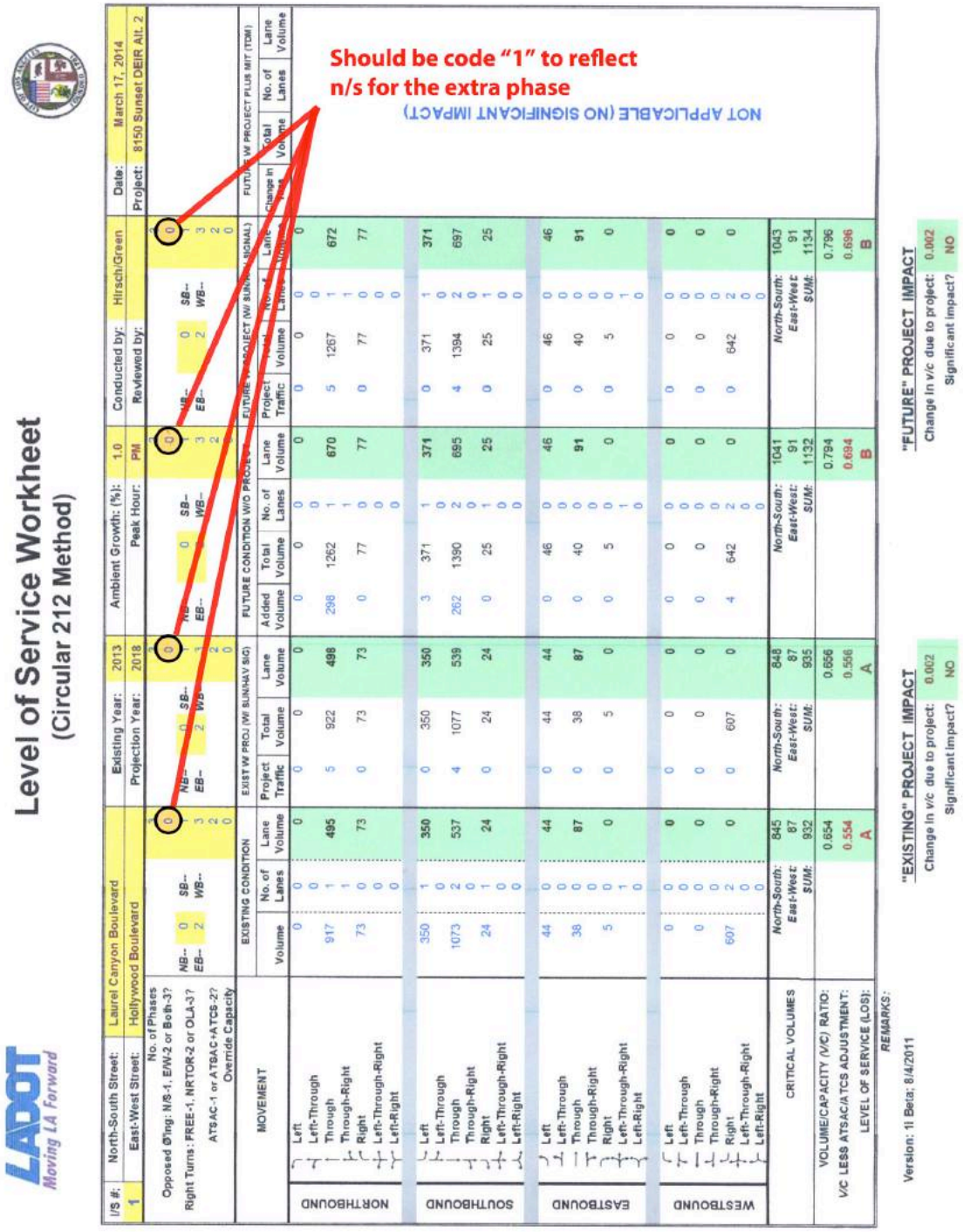

EXHIBIT 4

GEOGRAPHIC DISTRIBUION OF TRIPS

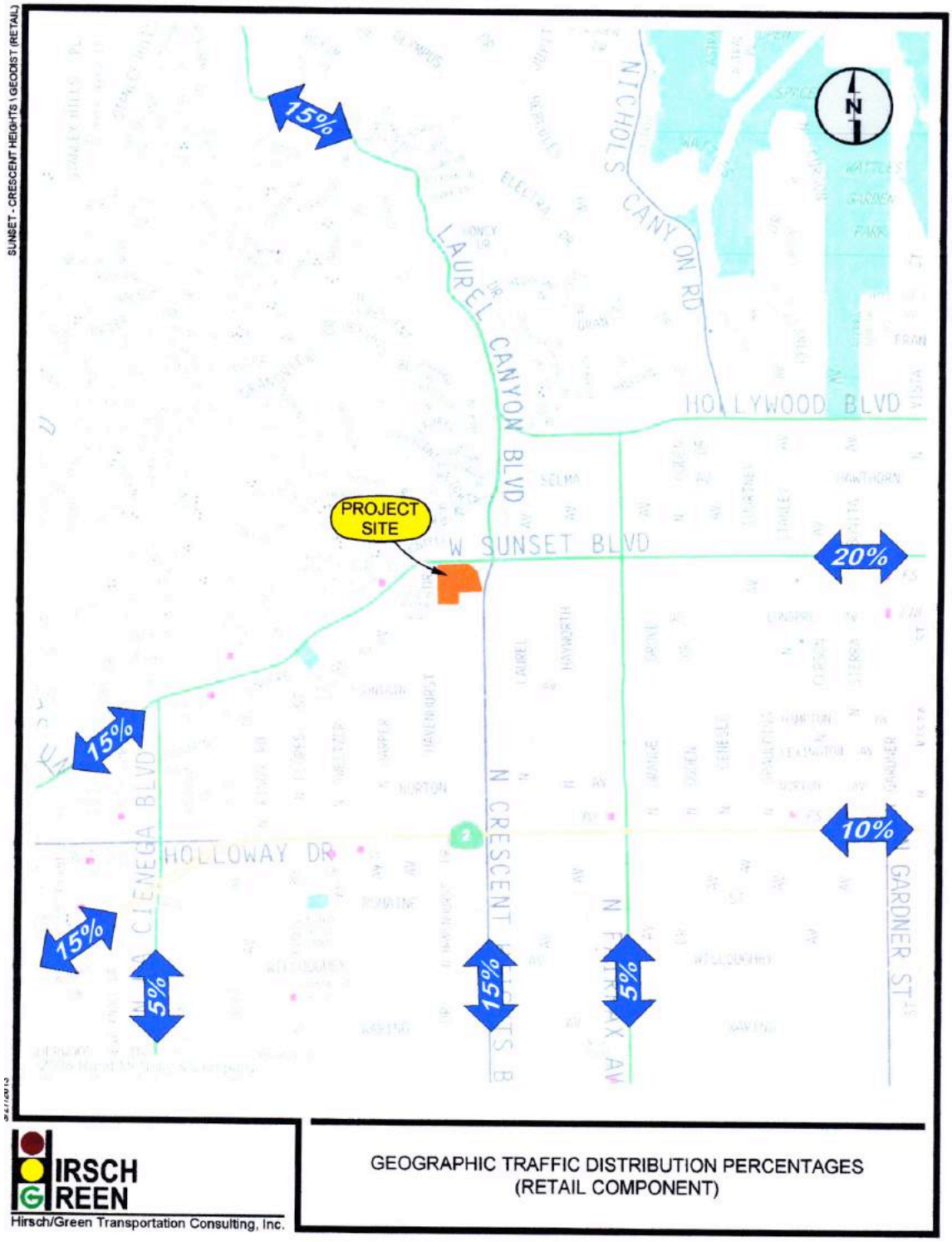

EXHIBIT 5

Land Use: 820
Shopping Center

Description

A shopping center is an integrated group of commercial establishments that is planned, developed, owned and managed as a unit. A shopping center's composition is related to its market area in terms of size, location and type of store. A shopping center also provides on-site parking facilities sufficient to serve its own parking demands. Specialty retail center (Land Use 826) and factory outlet center (Land Use 823) are related uses.

Additional Data

Shopping centers, including neighborhood centers, community centers, regional centers and super regional centers, were surveyed for this land use. Some of these centers contained non-merchandising facilities, such as office buildings, movie theaters, restaurants, post offices, banks, health clubs and recreational facilities (for example, ice skating rinks or indoor miniature golf courses). The centers ranged in size from 1,700 to 2.2 million square feet gross leasable area (GLA). The centers studied were located in suburban areas throughout the United States and, therefore, represent typical U.S. suburban conditions.

Many shopping centers, in addition to the integrated unit of shops in one building or enclosed around a mall, include outparcels (peripheral buildings or pads located on the perimeter of the center adjacent to the streets and major access points). These buildings are typically drive-in banks, retail stores, restaurants, or small offices. Although the data herein do not indicate which of the centers studied included peripheral buildings, it can be assumed that some of the data show their effect.

The vehicle trips generated at a shopping center are based upon the total GLA of the center. In cases of smaller centers without an enclosed mall or peripheral buildings, the GLA could be the same as the gross floor area of the building.

Separate equations have been developed for shopping centers during the Christmas shopping season. Plots were included for the weekday peak hour of adjacent street traffic and the Saturday peak hour of the generator.

Information on approximate hourly, monthly and daily variation in shopping center traffic is shown in Tables 1–3. It should be noted, however, that the information contained in these tables is based on a limited sample size. Therefore, caution should be exercised when applying the data. Also, some information provided in the tables may conflict with the results obtained by applying the average rate or regression equations. When this occurs, it is suggested that the results from the average rate or regression equations be used, as they are based on a larger number of studies.

EXHIBIT 6

Trip Generation Analysis **Sunset-Crescent Hts Mixed Use** **RTPG - 18-Jan-15**
8150 W. Sunset

SOURCE: ITE - TRIP GENERATION MANUAL - 9TH EDITION

NOTE	ITE CODE	LAND USE	"X"	DAILY TRIP ENDS	AM PEAK HOUR TRIPS	INBOUND	OUTBOUND	PM PEAK HOUR TRIPS	INBOUND	OUTBOUND
note 1	220	APARTMENT	249 DU	1656	127	25	102	154	90	65
note 2	820	SHOPPING CENTER	111.3 K-SQ FT	7280	166	103	63	644	309	335
DISCOUNT APARTMENT TO SHOPPING CENTER			10%	(166)	(13)	(3)	(10)	(15)	(9)	(6)
			TOTAL	8770	280	126	155	783	390	393
		DISCOUNTS DUE TO PRIOR USE								
note 2	820	SHOPPING CENTER	80 K-SQ FT	5874	136	84	52	516	248	268
			TOTAL	5874	136	84	52	516	248	268
		SCOPING NET TRIPS		2896	144	41	103	267	142	125
note 3		DISCOUNTS DUE TO TRANSIT	5 PERCENT	(145)	(7)	2	(5)	(13)	(7)	(6)
		NET NEW TRIPS		**2751**	**137**	**44**	**98**	**254**	**135**	**119**
		COMPARE DEIR Table 4.J-3, p 4.J-40 NET NEW TRIPS		**1077**	**(82)**	**(92)**	**10**	**216**	**158**	**58**
		DIFFERENCE		**1674**	**219**	**136**	**88**	**38**	**(23)**	**61**

note 1 APARTMENT pk hour t=6.65 x AM pk hour of adjacent street 20% in; 80% out
APARTMENT pk hour t=0.51 x PM pk hour of adjacent street 65% in; 35% out
APARTMENT daily t =0.62 x DAILY

note 2 SHOPPING CENTER LN (T) = 0.65 LN (X) +5.83 daily trips LN (T) = 0.65 LN (X) +5.83 daily trips
LN (T) = 0.65 LN (111.3) +5.83 LN (T) = 0.65 LN (80) +5.83
LN (T) = 8.89 LN (T) = 8.67
T = 7280 T = 5874

am pk hour of adjacent street 62% in; 38% out (based on peak hour of generator)
LN (T) = 0.61 LN (X) +2.24 LN (T) = 0.61 LN (X) +2.24
LN (T) = 0.61 LN (111.3) +2.24 LN (T) = 0.61 LN (80) +2.24
LN (T) = 5.11 LN (T) = 4.91
T = 166 T = 136

pm pk hour of adjacent street 48% in; 52% out
LN (T) = 0.67 LN (X) +3.31 LN (T) = 0.67 LN (X) +3.31
LN (T) = 0.67 LN (111.3) +3.31 LN (T) = 0.67 LN (X) +3.31
LN (T) = 6.47 LN (T) = 6.25
T = 644 T = 516

note 3 FREQUENT Bus service on both Sunset and on La Brea

TRIP RATES PER ITE TRIP GENERATION HANDBOOK (9TH EDITION)

EXHIBIT 7
RELATED PROJECTS MAP

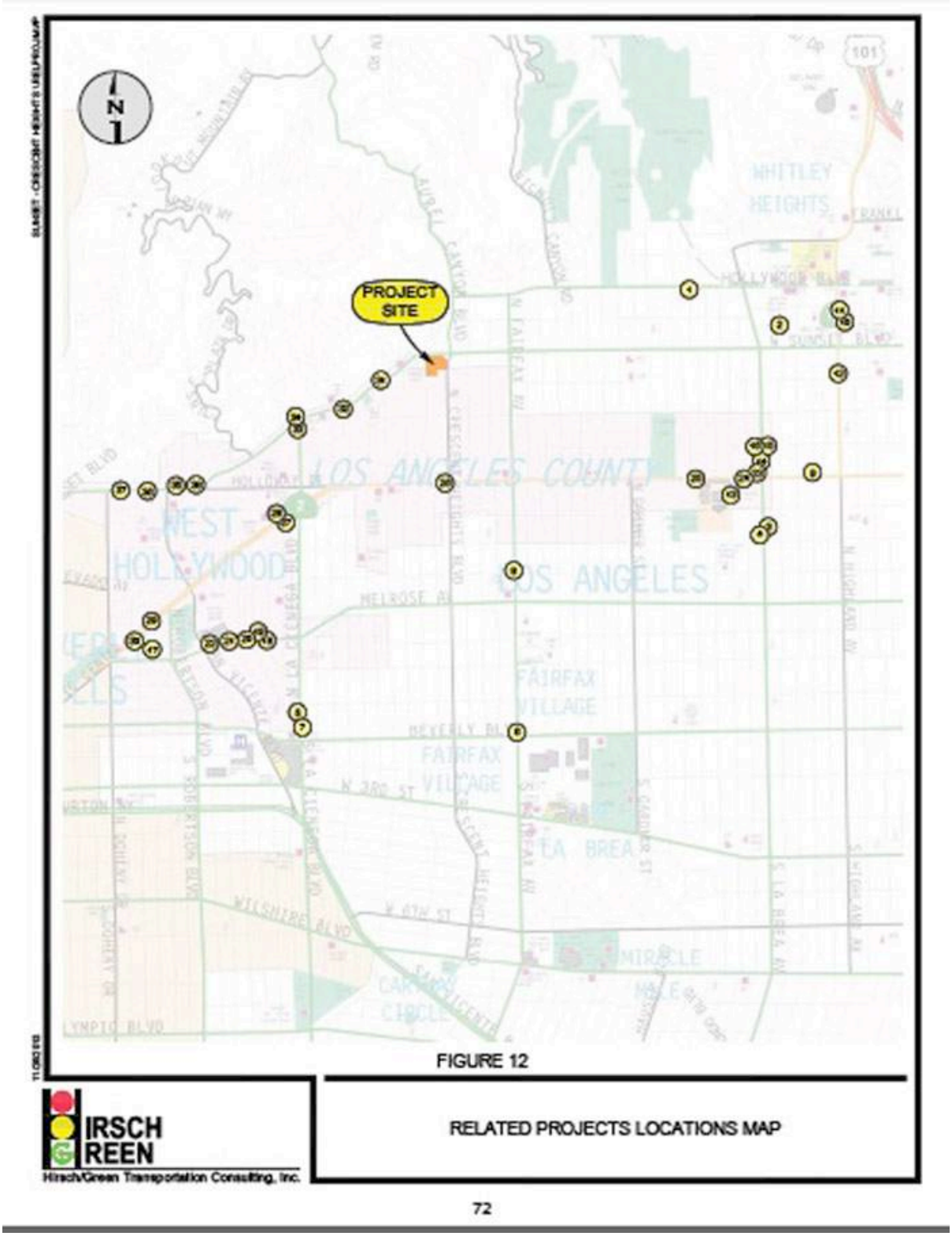

EXHIBIT 8
ADDITIONAL RELATED PROJECTS

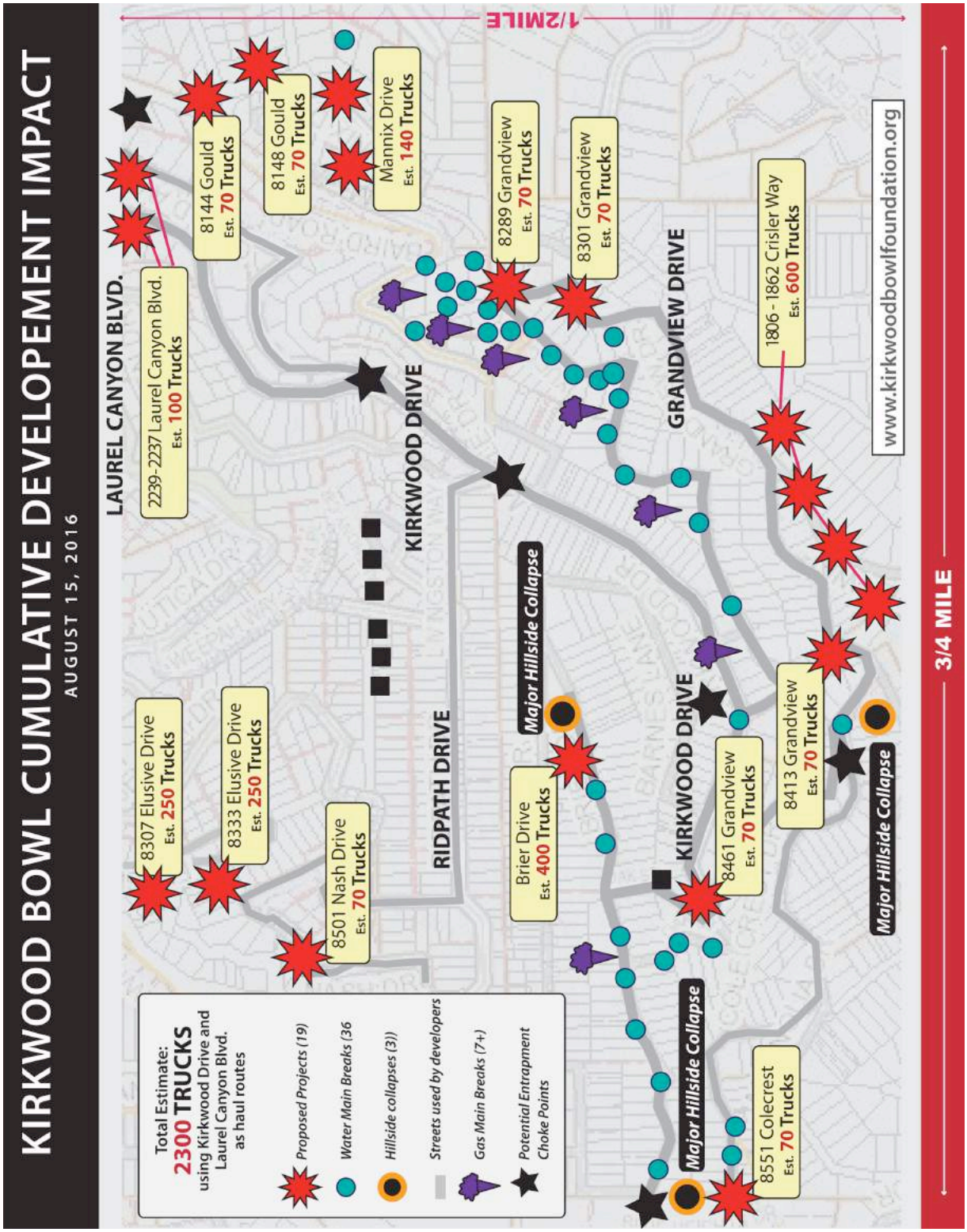

EXHIBIT 9 – PROPOSED CONSTRUCTION TRUCK HAUL ROUTES