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January 10, 2017

Councilmember Jose Huizar, Chair
Councilmember Marqueece Harris-Dawson
Councilmember Gilbert A. Cedillo
Councilmember Mitchell Englander
Councilmember Felipe Fuentes

Date: 1/18/17
Submitted in PLUM Committee
Council File No: _____
Item No. X7 & 8
PUBLIC

Planning and Land Use Management Committee
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: City Planning Case Nos: CPC-2015-896-GPA-VZC-HD-MCUP-ZV-DB-SPR,
VTT-74131-2A and ENV-2015-897-EIR

Council File Nos: 16-1368-S2, 16-1368

Project Address:
333 S. La Cienega Boulevard

**PROPOSED MIXED USE PROJECT LOCATED AT 333 S. LA CIENEGA
BOULEVARD --- TRAFFIC STUDY PEER REVIEW**

I am a Transportation/Planner Engineer with over 40 years of experience in reviewing Development Projects for Traffic Impacts within the context of City of Los Angeles and State of California Environmental Regulations. **Attachment 1** of this letter is a summary of my professional experience, which includes my former position with the City of Los Angeles Department of Transportation (LADOT) as the Chief of the Bureau of Planning and Land Use Development. At the request of the Beverly Wilshire Homes Association, I have completed an Independent Peer Review of the Traffic Study (dated March 17, 2016) and subsequent material analyzing an amended, slightly smaller project (dated October 13, 2015) prepared by the Applicant's Traffic Consultant – The Mobility Group. Those reports are part of the initial Draft Environmental Impact Report (DEIR) and the Final Environmental Impact Report (FEIR) prepared in support of the proposed project.

Following are my detailed review comments:

1. The Traffic studies misrepresent the operation of the traffic signal at 3rd/La Cienega. Thus the conclusion about that Level of Service (LOS) for this intersection being LOS C with and without the project implying that traffic conditions are "acceptable" consistent with the Community Plan is misleading and fallacious. The Traffic studies analyzed the intersection with no adjustment for "opposed" left turn phases (see **Attachments 2 and 3**). In a field review of the intersection I observed that the left turn traffic signals for both the north/south and the east/west traffic controls operated separately. Thus the traffic signal allocation of traffic flow during the peak hours has resulted in significantly more congestion than implied by LOS C. Correcting for the left turn phasing, by adding the code #3 to the LADOT evaluation sheet, predicted LOS E/F for this intersection - a much worse level of congestion which is consistent with my field observations (see **Attachment 4**).
2. The use of the trip rate for a "Super Market" for what is likely to be a high end /specialty food market grossly understates the trip generation potential of the proposed project. My review of the base data in the Institute of Transportation Engineer (ITE) Trip Generation Handbook, cited in the Traffic studies, indicates that the average size of the sites surveyed for the Land Use Category 850 - Supermarket have an average size of 56,000 square feet. The proposed "supermarket" is expected to be approximately 27,000 square feet, a totally different kind of market.

Appendix A

In a similar development case processed by the City of Burbank, the applicant was required to survey Whole Foods Markets (including the one at SM/Fairfax) to evaluate the trip potential of a high end/specialty food market. That survey yielded a PM peak hour trip rate of 15.16 vehicles per 1,000 square feet compare to the Supermarket rate used in the project Traffic study -- 9.98 vehicles per 1,000 square feet. **Attachment 5** summarizes my application of the Whole Foods market rate to the trip generation calculation and compares it to that which was presented in the project Traffic study. The conclusion is that the actual number of PM peak hour trips for the amended project could be 75% higher than evaluated in the Traffic study.

3. **Attachment 4** is a revision to the PM Peak Hour capacity analysis for the amended project impacts at 3rd/La Cienega, using the adjustments described in the above two findings – i.e., using the correct left turn phasing assumption and using the Whole Foods trip generation for the Supermarket. The conclusion is that at LOS E/F there would be a significant traffic impact during the PM Peak Hour at the intersection 3rd/La Cienega. The Traffic Study must be corrected for these identified errors in the analysis. The same error would surely apply to other intersections as well as to 3rd/La Cienega. **The project must examine traffic mitigation measures for the impact at 3rd/La Cienega and at other intersections as appropriate; and the City must re-circulate the DEIR.**

4. The DEIR summarily dismisses the likelihood that there would be traffic impacts on adjacent residential streets from the project – based upon the conclusion that the surrounding arterials are not projected to be congested. LADOT Traffic Study policies describe the parameters of thresholds for residential street impacts and when it might be appropriate for review of impacts. An analysis of residential impacts is warranted if adjacent arterials are congested and if residential streets would present a logical by-pass route. The minimum threshold for residential impacts would be an addition of 120 vehicles per hour.

Attachment 6 is a map showing the project location and the proximity of residential streets within the Beverly Wilshire Homes Association: Blackburn Avenue, Orlando Avenue, and 4th Street. The congestion from the traffic impact at 3rd/La Cienega could logically cause diverted traffic to these residential streets. According to Table B.2 of Attachment B to the Applicant's Traffic study, the Total Daily Trips for the amended project is estimated to be 1,947 vehicles per day. If only 10% of the daily traffic would divert to an Orlando- Blackburn or 4th Street route – the impact would be 195 vehicles per day – significantly above the 120 vehicles per day threshold. **The possibility of a residential traffic impact requires that the Traffic Study be augmented with an analysis of the residential street conditions and impacts.**

5. LADOT Traffic Study Policies allow up to a 15% transit discount for a project proximate to a Rapid Bus line. While the project is in-fact adjacent to Metro Line 705 Rapid Bus line, it seems illogical that the luxury components of the project (i.e.: homes with 24:7 on-call drivers; a “quality” restaurant; and a high end/specialty Supermarket) would lend itself to significant walking and public transit use.


Again, referring to LADOT policies, the granting of the full 15% transit/pedestrian credit must be evidenced by transit and pedestrian improvements. Reviewing the staff report on the project, it appears that the applicant has offered to install a pedestrian traffic signal and cross walk across Blackburn Avenue and to install a bus transit shelter for the Rapid Bus line stop on La Cienega Boulevard. While these are documented in the FINDINGS section of the staff report, there are no supporting conditions of approval that would compel the applicant to follow through on these measures. **The project must be conditioned to install the traffic signal, cross walk and transit shelter to the satisfaction of LADOT to ensure the allowance of the 15% transit/pedestrian credit.**

6. The Traffic Study assumes the geographic distribution project trips to be 20% north; 30% south; 15% east; and 35% to west. There is no evidence presented justifying this assumption. The assertion that only 15% of the traffic is oriented to the east understates the potential impact to the Beverly Wilshire Homes Association, the residential neighborhood to the east. **The Traffic Study must be updated to justify the geographic distribution of project trips.**

Based upon my review of the Traffic Analyses, I would conclude that the Traffic Study is inadequate and wrongly concludes “no significant” traffic impact.

The Los Angeles City Council should not certify the FEIR until the Traffic Study is corrected and appropriate traffic mitigation measures are identified. The FEIR should be re-circulated as appropriate and the approval of the requested project zone change and vesting tentative tract map should be conditioned to include appropriate measures.

Very truly yours,


Allyn D. Rifkin, PE

Attachment 1 – Allyn D. Rifkin, PE statement of qualifications

Attachment 2 – PM Peak Hour LOS Analysis at 3rd/La Cienega – Original Project

Attachment 3 – PM Peak Hour LOS Analysis at 3rd/La Cienega – Amended Project

Attachment 4 – Revised PM Peak Hour LOS Analysis at 3rd/La Cienega – Amended Project

Attachment 5 – Comparative PM Peak Hour Trip Generation Analysis – Amended Project

Attachment 6 – Project Location Map

ATTACHMENT 1

**Allyn Rifkin, P.E.
Experience and Qualifications**

Mr. Rifkin has over 30 years of 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 has worked closely with residential neighborhood associations and developers to negotiate consensus on traffic mitigation measures in association with proposed development projects. Other consultant efforts of interest include assistance to the Eagle Rock neighborhood in the formation of the Colorado Boulevard Pilot Community Parking program and to County Supervisor Yaroslavsky in the initial proposal to convert Olympic and Pico Boulevards into a one-way pair.

Professionally, Allyn is a registered professional engineer (PE) in the State of California. He 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.

ATTACHMENT 2
PM Peak Hour LOS Analysis at 3rd/La Cienega – Original Project

LA DOT Moving LA Forward
SHOULD BE #3 FOR OPPOSED PHASING
Level of Service Worksheet
333 S La Cienega - PM Peak Hour



US #:	North-South Street:	East-West Street:	La Cienega Boulevard 3 rd Street	Year of Count: Projection Year:	2015 2017	Ambient Growth: (%) Peak Hour:	1 PM	Conducted by: Reviewed by:	Eric Jil	Date: Project:	3/11/2015 333 S La Cienega				
											Right Turn: FREE-R, WB-1, WB-2 or OLA-31	ATSA-1 or ATSA-C-ATCS-27	Overdrive Capacity	Future W/ Project W/ Mitigation	
EXISTING CONDITION				EXISTING PLUS PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT				EXISTING PLUS PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
				Project	Total	Lane	No. of	Total	No. of	Total	No. of	Total	No. of	Total	No. of
				Volume	Volume	Volume	Lane	Volume	Lane	Volume	Lane	Volume	Lane	Volume	Lane
NORTHBOUND	Left			104	2	57	2	106	2	58	2	105	2	58	2
	Left-Through			1090	2	432	2	165	2	485	2	1277	2	485	2
	Through-Right			205	0	205	0	208	0	208	0	208	0	208	0
	Right			146	2	80	2	4	153	2	84	2	153	2	84
SOUTHBOUND	Left			957	2	360	2	136	1112	2	412	10	1122	2	418
	Left-Through			122	0	122	0	1	125	0	125	7	132	0	132
	Through-Right			159	1	159	1	6	166	1	168	10	178	1	178
	Right			761	2	381	2	13	789	2	395	8	797	2	399
EASTBOUND	Left			78	1	50	1	80	0	51	1	30	119	1	90
	Left-Through			178	1	178	1	1	182	1	182	4	186	1	186
	Through-Right			556	1	347	1	11	580	1	362	7	587	1	365
	Right			135	0	135	0	5	143	0	143	143	0	143	
WESTBOUND	Left			512	1	179	1	6	185	1	182	4	186	1	186
	Left-Through			560	1	347	1	11	580	1	362	7	587	1	365
	Through-Right			135	0	135	0	5	143	0	143	143	0	143	
	Right			570	1	179	1	1	182	1	182	4	186	1	186
CRITICAL VOLUMES				North-South: 512	East-West: 571	Sum: 1083	North-South: 570	East-West: 585	Sum: 1154	North-South: 570	East-West: 585	Sum: 1154	North-South: 570	East-West: 585	Sum: 1154
VOLUME CAPACITY (V/C) RATIO:				0.780	0.788	0.718	0.841	0.741	0.741	0.847	0.747	0.747	0.847	0.747	0.747
V/C LESS ATSA/CATS ADJUSTMENT:				0.710	0.718	0.718	0.741	0.741	0.741	0.847	0.747	0.747	0.847	0.747	0.747
LEVEL OF SERVICE (LOS):				C	C	C	C	C	C	C	C	C	C	C	C

Change in v/c due to project: 0.008
Significant impacted? NO
Fully mitigated? N/A

PROJECT IMPACT
Change in v/c after mitigation: 0.008
Significant impacted? NO
Fully mitigated? N/A

ATTACHMENT 3
PM Peak Hour LOS Analysis at 3rd/La Cienega – Amended Project



LADOT
Moving LA forward
SHOULD BE #3 FOR OPPOSED Level of Service Worksheet
333 S La Cienega - PM Peak Hour
PHASING

US #:	North-South Street: East-West Street:	La Cienega Boulevard 3rd Street		Year of Count: Projection Year:		Ambient Growth: (%) Peak Hour:		Conducted by: Reviewed by:		Date: Project:	
		2015		2017		PM		Eric Ji		10/5/2015 333 S La Cienega	
		1	0	4	57	106	1277	4	0	0	0
Disposition: NS-1, EW-2 or Both-3? Right Turn: PRESENT, W/TURNER or OLA-3? ATSAC-1 or ATSAC+ATCS-2? Override Capacity		0	0	0	0	0	0	0	0	0	0
MOVEMENT		EXISTING CONDITION		EXISTING PLUS PROJECT		FUTURE CONDITION W/O PROJECT		FUTURE CONDITION W/ PROJECT		FUTURE W/ PROJECT W/ MITIGATION	
		No. of Lanes	No. of Lanes	No. of Lanes	No. of Lanes	No. of Lanes	No. of Lanes	Total Volume	Total Volume	Total Volume	No. of Lanes
		Volume	Volume	Volume	Volume	Volume	Volume	Added Volume	Added Volume	Added Volume	Lane Volume
		104	57	104	57	106	58	106	58	0	58
		2	2	2	2	2	2	2	2	2	2
		1090	432	1090	432	1277	495	1277	495	0	1277
		1	1	1	1	1	1	1	1	1	1
		205	205	205	205	208	208	208	208	0	208
		0	0	0	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	0	0
		146	80	146	80	153	84	153	84	0	153
		2	2	2	2	2	2	2	2	2	2
		857	365	966	365	1112	412	1121	417	0	1121
		1	1	1	1	1	1	1	1	1	1
		122	128	6	128	1	125	6	131	0	131
		0	0	0	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	0	0
		150	159	7	160	6	168	7	175	0	175
		1	1	1	1	1	1	1	1	1	1
		761	381	6	769	13	789	8	797	0	797
		2	2	2	2	2	2	2	2	2	2
		78	50	51	129	80	51	51	102	0	102
		0	0	0	0	0	0	0	0	0	0
		179	179	4	183	-1	182	4	186	0	186
		1	1	1	1	1	1	1	1	1	1
		558	347	6	564	11	580	6	596	0	596
		1	1	1	1	1	1	1	1	1	1
		135	135	5	143	5	143	5	143	0	143
		0	0	0	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	0	0
		512	512	North-South: East-West: SUM:	512 585 1097	North-South: East-West: SUM:	512 577 1089	North-South: East-West: SUM:	579 585 1164	North-South: East-West: SUM:	579 585 1164
		0.780	0.741	VOLUME/CAPACITY (V/C) RATIO:	0.741	0.641	0.641	0.847	0.847	0.847	0.847
		0.710	0.715	VOLUME/CAPACITY (V/C) RATIO:	0.715	0.741	0.741	0.741	0.741	0.741	0.741
		C	C	LEVEL OF SERVICE (LOS):	C	C	C	C	C	C	C

Change in v/c due to project: 0.006 Δv/c after mitigation: 0.006
Significant impacted? NO Fully mitigated? N/A

Old Peak Hour: 10:5-15 Proposed Peak Hour: Existing: 10

ATTACHMENT 4

Revised PM Peak Hour LOS Analysis at 3rd/La Cienega – Amended Project



Level of Service Worksheet
(Circular 212 Method)

LADOT
Moving LA Forward

IFS #:	North-South Street:		La Cienega Blvd		Year of Count:		Ambient Growth (%):		Conducted by:		Date:			
	16	East-West Street:	3rd Street	3rd Street	2015	2017	PM	Peak Hour:	RTIP	Reviewed by:	1/4/2017	Project-id w whole foods, 333 S. L		
Opposed Orig: NS-1, EW-2 or Bch-3? No. of Phases Right Turn: FREE-1, RTTOR-2 or OLA-3? NB-0 SB-0 ATBAC-1 or ATBAC-1CS-2? EB-0 WB-0 Overlap Capacity: 0														
EXISTING PLUS PROJECT					EXISTING CONDITION					FUTURE CONDITION W/ PROJECT				
MOVEMENT Left: 104 2 57 0 104 57 Left-Through: 4 3 Through: NB-0 SB-0 Through-Right: 1080 2 432 0 1090 432 Right: 205 0 205 0 205 205 Left-Through-Right: 1 Left-Right: 0														
NORTHBOUND														
Left: 146 2 80 0 146 80 Left-Through: 1 Through: 967 2 360 Through-Right: 122 0 122 Right: 1 Left-Through-Right: 0 Left-Right: 0														
SOUTHBOUND														
Left: 159 1 159 12 171 186 Left-Through: 1 Through: 781 2 381 13 789 388 Through-Right: 78 1 50 89 167 139 Right: 1 Left-Through-Right: 0 Left-Right: 0														
EASTBOUND														
Left: 179 1 179 7 186 186 Left-Through: 1 Through: 558 1 347 11 569 352 Through-Right: 135 0 135 5 143 143 Right: 1 Left-Through-Right: 0 Left-Right: 0														
WESTBOUND														
CRITICAL VOLUMES North-South: 732 East-West: 728 SUM: 1520														
VOLUME/CAPACITY (V/C) RATIO: 1.105														
V/C LESS ATBAC/1CS ADJUSTMENT: 1.033														
LEVEL OF SERVICE (LOS): F														
REMARKS:														

EXISTING PLUS PROJECT		EXISTING CONDITION		FUTURE CONDITION W/ PROJECT	
Project Traffic	Total Lane Volume	Project Traffic	Total Lane Volume	Added Volume	No. of Lanes
104	57	0	104	0	57
1090	432	0	1090	0	432
205	205	0	205	0	205
146	80	0	146	0	80
967	360	0	967	0	360
122	122	0	122	0	122
159	186	12	171	16	186
781	388	14	795	14	388
78	139	0	78	0	139
179	186	7	186	7	186
558	352	11	569	11	352
135	143	0	135	0	143
732	600	807	757	155	916
728	740	757	769	41	769
1520	1520	1664	1685	125	1685
1.105	1.120	1.210	1.175	0.035	1.175
1.033	1.033	1.110	1.125	0.082	1.125

PROJECT IMPACT
 Change in v/c due to project: 0.035
 Significant Impacted? YES
 Fully mitigated? NO
 v/c after mitigation: 1.175

ATTACHMENT 5
Comparative PM Peak Hour Trip Generation Analysis – Amended Project

rpg 1-4-17

Trip Generation Analysis

333 S. LA CIENEGA
Revised Project
Modified Super Market

SOURCE: ITE - TRIP GENERATION MANUAL - 9TH EDITION

PM Peak

Land Use Assumptions	Source & Code	Quantity	Units	PM Peak Hour					
				Trip Rate			Total Trips		
				In	Out	Total	In	Out	Total
EXISTING USES									
Department Store	ITE 875	47,676	SF	0.95	0.92	1.87	-45	-44	-89
Transit/Walk Reduction - 15%							7	7	13
Pass-by Reduction - 50%							19	19	38
NET RETAIL									
							-19	-19	-38
TOTAL EXISTING									
							-19	-19	-38
PROPOSED USES									
Apartments	ITE 220	145	DU	0.40	0.22	0.62	60	29	90
Transit/Walk Reduction - 15%							-9	-4	-13
NET RETAIL									
							50	26	76
Super Market	see NOTE	27,685	SF	7.58	12.08	15.16	210	334	544
Internal Trip Reduction - 5%							-10	-17	-27
Transit/Walk Reduction - 15%							-29	-48	-78
Pass-by Reduction - 40%							-67	-108	-176
NET SUPERMARKET									
							102	162	263
Restaurant	ITE 931	3,370	SF	5.02	2.47	7.49	17	8	25
Internal Trip Reduction - 5%							-1	0	-1
Transit/Walk Reduction - 15%							-2	-1	-4
Pass-by Reduction - 10%							-1	-1	-2
NET RESTAURANT									
							11	7	18
TOTAL PROPOSED									
							163	195	357
TOTAL NET									
							144	176	320

Note: PM Peak hour Supermarket rates from City of Burbank
 - based on average of 3 So Calif Whole Foods Mkts

increase over previous trip assignments

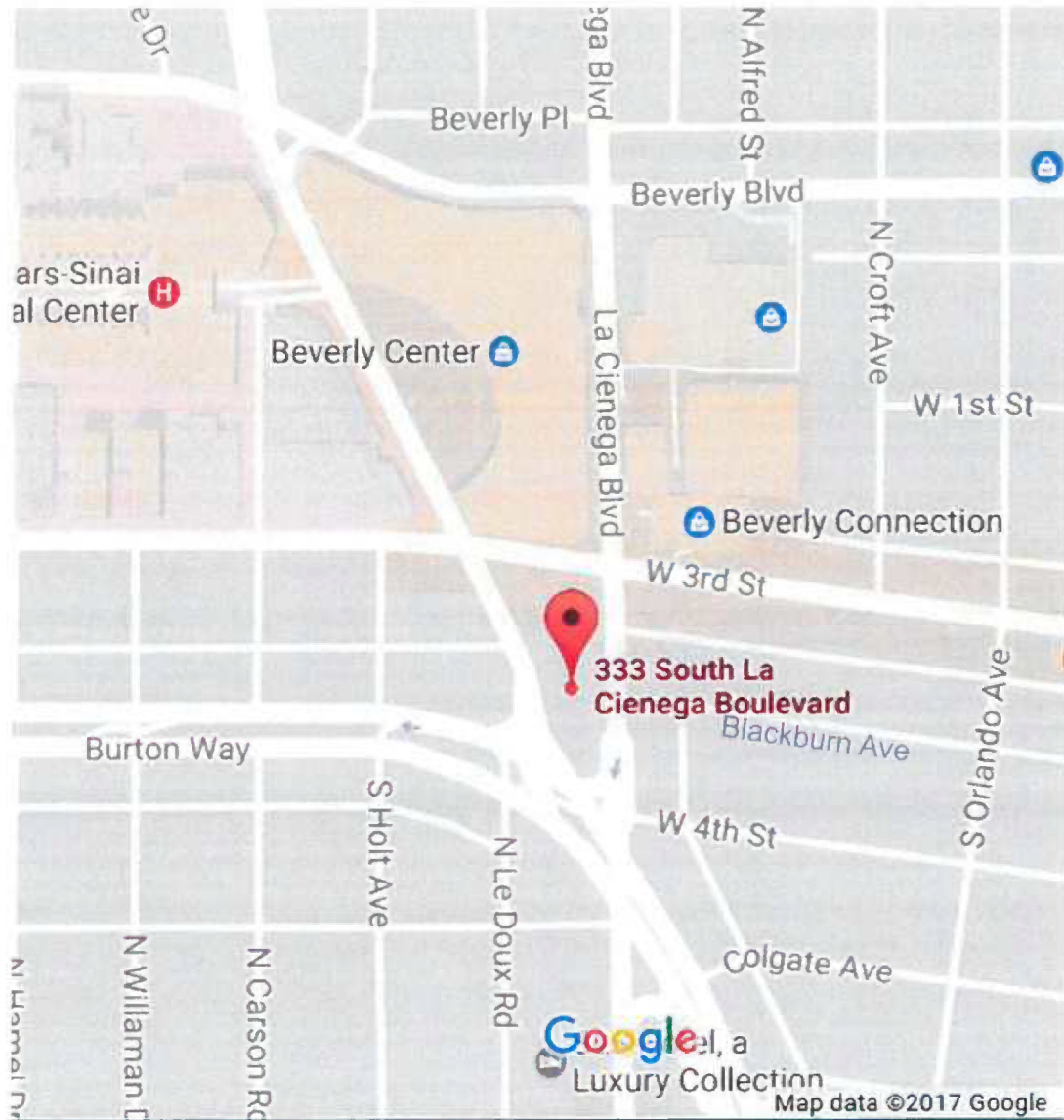
DEIR SCENARIO

114	77	191
adjustment factor		
1.68		

REVISED ALTERNATIVE

107	76	183
adjustment factor		
1.75		

ATTACHMENT 6
Project Location Map



3. FUTURE TRAFFIC CONDITIONS

PROJECT TRAFFIC

The development of traffic generation estimates for the proposed project involves the use of a three-step process, trip generation, trip distribution, and traffic assignment. For the purposes of this report, the terms "traffic" and "trips" generally refer to vehicle trips.

Project Traffic Generation

The proposed project consists of residential apartments and a high-end grocery store. Per City direction, empirical data was collected to properly develop trip rates based on the possibility that trip generation rates from the Institute of Transportation Engineers (ITE) underestimate trip making characteristics of high-end grocery stores that tend to operate longer hours and provide food service options that attract more patrons for shorter trips, relative to typical grocery stores. In conjunction with the City of Burbank, three sites were chosen for the empirical trip generation study:

- Whole Foods West Los Angeles (11666 National Boulevard, Los Angeles, CA)
- Whole Foods Pasadena (465 South Arroyo Parkway, Pasadena, CA)
- Whole Foods Beverly Hills (239 N. Crescent Drive, Beverly Hills, CA)

Surveys were conducted at all three Whole Foods Market (WFM) locations from 7:00 to 10:00 AM and 4:00 to 7:00 PM on Tuesday, Wednesday, and Thursday, November 5 to 7, 2013. At each location the WFM does not share parking with another use and the driveways provide exclusive access to WFM parking. At all three store locations, cars were counted at driveways as they entered and left the market's parking facilities. Additionally, the trip generation study collected information on the number of vehicles that were observed to park on street and patronize the WFM, thereby accounting for trips generated that may not have utilized the stores exclusive parking facility. The trip generation estimates are provided in Table 3.

The proposed project will replace existing land uses. As such, the total number of proposed project trips has been reduced by the number of trips associated with the existing land uses. This reduction eliminates double counting of the number of net new vehicles expected on the roadway.

The total number of project trips was also reduced by the expected internal capture of the proposed project. Internal capture refers to trips generated by mixed use developments where trips to or from two land uses in the proposed project are made by just one vehicle trip entering or leaving the project site. Such trips may include those made by residents patronizing the on-site retail before or after their commute to work. Internal capture results in a lower number of total vehicles entering and leaving the project site, which in turn reduces the total number of vehicles on the roadway network.



**TABLE 3
TALARIA AT BURBANK PROJECT TRIP GENERATION ESTIMATES**

Land Use	Size	ITE Code	Daily Rate	Peak Hour			PM Peak Hour			Daily Trips	Estimated Trip Generation																																
				Rate	% In	% Out	Rate	% In	% Out		AM Peak Hour			PM Peak Hour																													
											In	Out	Total	In	Out	Total																											
Proposed Land Uses																																											
Retail - Supermarket [a] <i>Less 40% Pass-By Credit [g] Less 10% Internal Capture [h] Less 5% Walk/Bike Credit [i]</i>	42.96 ksf	850	102.2	7.58	53%	47%	12.08	49%	51%	4,392 (1,757) (264) (119)	173 (69) (10) (5)	153 (61) (10) (6)	326 (130) (20) (2)	254 (102) (15) (2)	265 (106) (16) (7)	519 (208) (31) (14)																											
Apartment [b]	241.00 DU	220	6.65	0.51	20%	80%	0.62	65%	35%	1,584	24	98	122	98	52	150																											
PROPOSED PROJECT TRIP ESTIMATES										3,837	113	176	289	228	188	416																											
Existing Land Uses																																											
General Office Building [c]	21.00 ksf	710	11.03	1.56	88%	12%	1.49	17%	83%	(232)	(29)	(4)	(33)	(5)	(26)	(31)																											
Single Family Detached House [d]	2.00 DU	210	9.52	0.75	25%	75%	1.00	63%	37%	(19)	(1)	(1)	(2)	(1)	(1)	(2)																											
Apartment [b]	41.00 DU	220	6.65	0.51	20%	80%	0.62	65%	35%	(273)	(4)	(17)	(21)	(16)	(9)	(25)																											
Church [e]	12.00 ksf	560	9.11	0.56	62%	38%	0.55	48%	52%	(109)	(4)	(3)	(7)	(3)	(4)	(7)																											
Drinking Place [f]	1.83 ksf	925	--	--	--	--	11.34	66%	34%	--	n/a	n/a	n/a	(14)	(7)	(21)																											
TRIP CREDITS FOR EXISTING LAND USES TO BE REMOVED										(633)	(38)	(25)	(63)	(39)	(47)	(86)																											
TOTAL PROJECT TRIP GENERATION ESTIMATE										3,205	75	151	226	189	141	330																											

Notes:

- [a] Trip generation rate was calculated based on empirical data collected at three (3) Whole Foods stores in 2013. The trip generation rate presented is the average of the rates observed at the three stores.
- [b] Source: Trip Generation, Ninth Edition, Institute of Transportation Engineers (ITE), 2012. The average trip generation rate was used for trip generation purposes.
- [c] Source: Trip Generation, Ninth Edition, Institute of Transportation Engineers (ITE), 2012. The average trip generation rate was used for trip generation purposes.
- [d] Source: Trip Generation, Ninth Edition, Institute of Transportation Engineers (ITE), 2012. The average trip generation rate was used for trip generation purposes.
- [e] Source: Trip Generation, Ninth Edition, Institute of Transportation Engineers (ITE), 2012. The average trip generation rate was used for trip generation purposes.
- [f] Source: Trip Generation, Ninth Edition, Institute of Transportation Engineers (ITE), 2012. The average trip generation rate was used for trip generation purposes.
- [g] Given the large number of retail trips made as intermediate stops on the way from an origin to a primary trip destination without a route diversion, a pass-by trip credit of 40% was applied.
- [h] Given the large number of proposed retail trips that could be made by on-site residents without a vehicle trip, an internal trip credit of 10% was applied.
- [i] Given the number of residences and employment locations within a 1/2 mile of the project site, a bike/walk trip credit of 5% was applied.

Keith Nakata
811 N. Croft Ave.
Los Angeles, CA 90069

Date: 1/18/17

Submitted in PLUM Committee

Council File No. 16-1368 & 16-1368-82

Item No. 7 AND 8

PUBLIC COMMENT

Planning and Land Use Management Committee
200 N. Spring Street
Los Angeles, CA 90012

January 18, 2017

RE: CN 16-1368
333 S. La Cienega Blvd.

PLUM Members,

Today I speak in opposition to the current Proposed Project at 333 S. La Cienega Blvd.-Caruso, as not an appropriately scaled or the best use of the site. It totally subverts the existing Community Plan by rewriting the zoning on the site.

This Project reflects the corrupt "Pay to Play" system of overdevelopment in the City of Los Angeles and supported by some in the Planning Department.

I have named this Project "The Son of Sea Breeze" because it reflects the same abuse of campaign funding and "pet projects" that become a standard way to do business in the city. It uses money to rewrite the underlying Community Plans and Zoning and creates out of scale projects that lack the proper infrastructure necessary to support the impacts. "Pay to Play has no place in the thoughtful planning of the City.

I personally support EIR Alternatives 1 or 2. Caruso personally mentioned that he was contacted by Cedars Sinai in a recent meeting I attended with Councilmember Koretz. Cedars stated they are interested in repurposing the existing building as a Cancer Center.

The American Cancer Society has stated that in 2016 1,685,210 new cases of cancer were diagnosed in America. It remains a devastating disease that we need to continue to vigorously fight.

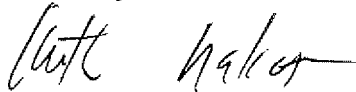
This use is a far more beneficial use of the site adjacent to the main Cedar Sinai campus and will provide far better jobs and is far better for the overall community. It also can be achieved within the existing Wilshire Community Plan.

EIR Alternative 2 if selected, also provides for a medical use with the addition of an affordable housing component.

I believe that the Cancer Center option was never fully explored during the EIR process, nor has been offered to the community to consider as a potential option.

You have a choice to make today, to either support a ultra-luxury apartment and gourmet grocery store for the rich or a Cedars Sinai Cancer Center for those who are in need serious medical care.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Nakata". The signature is written in a cursive style with a long horizontal stroke at the end.

Keith

Keith Nakata

THE MIRACLE MILE CIVIC COALITION
8758 Venice Boulevard • Los Angeles, California 90034

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City Attorney Mike Feuer
Councilmember Paul Koretz
Councilmember Herb Wesson
For Inquiries, Wally Marks 310-204-1865

January 18, 2017

Mr. David Ambrose (via email cpc@lacity.org)

Chair

LOS ANGELES CITY PLANNING COMMISSION

City of Los Angeles

200 North Spring Street

Los Angeles, CA, 90012-2601

Re: 333 S La Cienega Boulevard

Redevelopment (Case No. ENV-2015-897-EIR)

Date: 01/18/2017

Submitted in PLUM Committee

Council File No. 16-1368 & 16-1368-52

Item No. 748

Comm from Public

Dear Mr. Ambrose and fellow Commissioners:

We believe the 333 La Cienega Project is exciting, innovative, and transformative, and we support it. Please include this letter as the Miracle Mile Civic Coalition's **endorsement and support** for the Caruso Affiliated's project location at 333 South La Cienega Boulevard.

The leadership of our organization has met with the Caruso Affiliated team and review the project. We view this mixed use residential tower as a gateway to our community in the Miracle Mile and the Museum Row along Wilshire Boulevard.

Caruso Affiliated and in particular, Rick Caruso, is an active member in good standing within our organization; moreover as a consistently good partner and ideal neighbor, Caruso Affiliated has worked with our community in a spirit of cooperation. We believe with this new project he and his team will create an iconic project, mirroring its twin, 8500 Burton Way, across the boulevard, and will bring a strong aesthetic structure beautifying a rather busy and disjointed intersection.

Moreover, the specific features of the project, namely the on-site affordable units, new median islands, public green space, community meeting room, enhanced crosswalk, and new bike ways, justify our support of the project and its variance from its current zoning.

Thank you for your consideration on this matter.

MIRACLE MILE CIVIC COALITION



Lyn MacEwen Cohen
President



Wally Marks
Vice President

cc: City Councilman Paul Koretz CD5

Date 1/18/17
Submitted in PLUM Committee
Council File No. 16-1368 16-1368-52
Item No. 7 # 3

January 18, 2017

7, 8

To: Los Angeles City Council Planning and Land Use Committee
From: Richard Platkin, 6400 W. 5th Street, Los Angeles, CA 90048
Beverly Wilshire Homes Association (BWA) Board Member
Email: rhplatkin@gmail.com
6400 W. 5th Street, Los Angeles, CA 90048-4710
Re: CPC-2015-896-GPA-VZC-HD-MCUP-ZV-DB-SPR
CEQA: ENV-2015897-EIR

1) Los Angeles, through a community-based legal General Plan planning process, has already identified locations where luxury high-rise apartment towers could and should be built by-right. Mr. Caruso could move his project a half-mile to the south, where Wilshire Boulevard has unlimited height, as well as the Purple Line Subway. He could also move the proposed project a mile or two to the west, where Century City already has many similar by-right high-rise luxury buildings.

2) The City Council's spot-zoning and spot-planning that will be necessary for this project will undermine the imminent update of the Wilshire Community Plan with many non-conforming uses, such as a 240 ~~story~~ building where the carefully formulated plans restrict development to 45 feet. feet

3) If this project, and then similar ones, goes through, there will be no certainty with the update of the Wilshire Community Plan. It will become an irrelevant shelf document because any developer with deep pockets will be able to do whatever they want with land in this neighborhood, regardless of carefully prepared and adopted zoning and plan designations.

4) DEIR Alternative 1, one of two environmentally superior options, a Cedars-Sinai outpatient cancer center, is a much better community-serving use of this location, and it does not require any entitlements or demolitions.

5) DEIR Alternative 2, also environmentally superior, is a code compliant residential project, with potential retail or medical at the ground level. It is also an excellent use of this site. Through SB 1818, it could have up to 100 units, with probably more affordable units than the 240 tower. Through on-menu incentives, this site could reach 5 stories, without any zone changes, General Plan Amendments, or height district changes, as well as any environmental impacts that need to be mitigated through 39 pages of Conditions of Approval.