COMMENT LETTER NO. 3

MEMORANDUM

To: *Luna & Glushon*

From: *CAJA Environmental Services, LLC*

Date: *May 31, 2017*

Subject: *Technical Assessment of the New Beatrice West Project (12553 West Beatrice Street) MND*

This memorandum contains CAJA Environmental Services, LLC's findings and comments on the Mitigated Negative Declaration, dated May 17, 2017 ("MND") for the "12575 Beatrice Street" ("Project"), at 12553-12575 West Beatrice Street, which was prepared by the City of Los Angeles ("City"). Our comments are organized as follows: (i) the first section addresses general issues, as it relates to the environmental documentation under the California Environmental Quality Act ("CEQA") for the Project; and (ii) the second section contains our firm's peer review analysis of the MND. Section II tracks the organization of the MND and contains our specific comments with respect to each Section.

I. GENERAL COMMENTS ON THE MND

As discussed in detail below, several impact areas were not addressed in the MND. CEQA sets out a fundamental policy requiring local agencies to integrate the requirements of CEQA with planning and environmental review procedures otherwise required by law or by local practice so that all those procedures, to the maximum feasible extent, run concurrently, rather than consecutively. It is for that reason that CEQA requires all environmental assessment/analysis, including formulation of mitigation measures to mitigate potential environmental impacts, to occur before a Project is approved. The MND fails to disclose necessary information to the public and to the decision-making body by omitting several pertinent CEQA environmental categories and/or by refusing to discuss and fully examine those issue areas to the fullest extent possible. 3-1

What's more, specific project information in the MND does not match what is proposed on the accompanying figures within the MND. As detailed below, it is difficult for the reader to understand and comprehend the overall height of the building, grading depths, parking locations, and proposed open space. The MND fails to give accurate and precise information within the MND to assist the public in their review.

The failure to comply with the law subverts the purposes of CEQA if it omits material necessary to inform decisionmaking and public participation.

II. SPECIFIC COMMENTS REGARDING THE MND

1. Impact Areas Were Not Addressed in the MND

Several environmental impact areas were not discussed and/or disclosed in the MND. This decision does not appear to be supported by substantial evidence or any evidence at all. If these impact areas had been analyzed, it appears that they would disclose potentially significant and unmitigable impacts on the environment. The following impact areas should not have been scoped, or left out, of the MND.

- Hazardous Materials (Methane): The MND does not address methane zone impacts. The Project Site is located within the City of Los Angeles Methane Zone based on the City of Los Angeles Department of City Planning, Zone Information and Map Access System. These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems depending on designation category. A Methane Gas Investigation Report should be conducted. The investigation should evaluate existing methane conditions. According to the Los Angeles Department of Building and Safety (LADBS), methane mitigation is required for all sites located in a Methane Zone or a Methane Buffer Zone, regardless of results obtained in a methane investigation. Specifically, requirements for control of methane intrusion in the City of Los Angeles are specified in Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code ("Division 71"). Since the Project is within a *Methane Zone*, the LADBS has the authority to withhold permits for construction unless detailed plans for adequate protection against methane intrusion are submitted. As such, the Site is located in a Methane Zone, as mentioned above, and appropriate mitigation should be listed to reduce potential impacts. By failing to include this CEQA category from the MND's analysis, the public and decisionmakers are prevented from imposing potentially valuable mitigation measures to reduce the scope of such methane impacts. 3-2

- Land Use Planning (Agency Regulations): The MND fails to disclose potential impacts as it relates to the regional level and associated land use plans. At the regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally-designated metropolitan planning organization. The Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Neither of the goals or policies of both plans are discussed or disclosed of in the MND. By failing to include this CEQA category from the MND's analysis, the public and decisionmakers are prevented from imposing potentially valuable mitigation measures to reduce regional level land use conflicts, if any. 3-3

- Utilities (Energy): The MND scoped out this issue area without sufficient analysis that the Project would have no impacts with respect to utilities and service systems. Additionally, the MND did not take into consideration the recent Porter Ranch gas leak, which has the potential to cost the Southern California Gas Company billions of dollars and may require the curtailment of gas supply to electric generators. The California Public Utilities Commission already has ordered a reduction in the volume of available gas for certain gas storage facilities in the region, which may impact the available supply of natural gas for the Project. This issue was improperly left out of the MND and requires analysis, as well as a full discussion of electricity supply and demand, as required by Appendix F, of the State CEQA Guidelines. 3-4

- Cumulative Analyses: The MND does not include a reliable or defensible cumulative impacts analysis, as required by CEQA. One of the basic and vital informational functions required by CEQA is a thorough analysis of whether the impacts of the Project, in connection with other related projects, are cumulatively considerable. Proper cumulative impact analysis is vital under CEQA because the full environmental impact of a proposed project cannot be gauged in a vacuum. Indeed, one of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact. Therefore, cumulative effects analysis requires consideration of "reasonably foreseeable probable future projects, if any." *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184; *Gentry v City of Murrieta* (1995) 36 Cal.App.4th 1359, 1414. This issue was improperly left out of the MND and requires analysis, per CEQA standards. 3-5

2. The Project Description (Section 2) Is Inadequate & Does Not Meet CEQA's Requirements

The Project Description is confusing and does not provide an accurate and stable definition of the proposed Project that is easily understood by the public or decisionmakers. These clarifications are necessary in order for the general public and decisionmakers to adequately review the MND. It is very unclear at times what the Applicant is proposing. Our findings are below. 3-6

- The description of the surrounding uses is inadequate. The MND makes no mention of the existing schools situated to the north and east of the Project Site.

- It is unclear if the proposed 135-foot height listed in the Project Descriptions is accurate or not. The language suggests that an additional 20-feet of mechanical penthouse component is also proposed. Is this considered part of the overall height of the structure? This requires clarification. 3-7

- The MND states that retail shops, restaurant uses, and lounges are included as part of the overall development and use of the Project site. However, the exact size and location of these mid- to ground-floor retail uses are not fully disclosed or calculated into the total of the available square-footage of the Project. Are these retail shops, restaurant, and lounge uses considered commercial square-footages? This does not make sense and is confusing. To evaluate the Project, the public must be given clear information regarding the amount of commercial square footages associated with such uses to fully understand the overall scope of potential impacts. Throughout many Sections of the MND (and as outlined further below), the analysis states that new retail uses are being proposed which will attract visitors to the site, yet, in other areas, the Project is advertised as a development with no commercial square-footage and claims that the retail uses will be primarily, if not entirely, used by onsite visitors or users of the office space. These issues need to be clarified in greater detail, as the narrative is extremely confusing at times and does not allow the public to meaningfully review the Project. 3-8

- The Project Description states that roughly 3,400 square-feet of the Project would be dedicated (we think) to solely retail and restaurant uses. However, the Traffic Impact Study does not include any retail and restaurant square footages in its trip generation estimates. How much floor area will actually be dedicated to restaurant 3-9

and dining space for the Project? These glaring inconsistencies illustrate that the Project Description shifts throughout the MND and makes it impossible to properly assess the significance of Project impacts. Please explain the reasons for the differences in floor area dedicated to restaurant and dining uses under the MND when compared to the Traffic Impact Study. 3-9 cont.

- Where are the proposed outdoor bars and restaurants to be located? They are not shown on the provided Site Plan. The public should be given clear information as to where they are to ensure that projected noise and air quality modeling are executed accurately. This is not indicated on the Site Plan. 3-10

- Regarding construction, Section 2.3 of the MND states that Project construction "would occur over approximately 22 months." This 22-month figure is used throughout the document, but it understates the actual construction time period required for the Project. The MND goes on to state that several months of infrastructure work would also be required, but since it "would precede" the 22-month construction period, it is not included as part of the overall construction time period. The "infrastructure work" should be properly considered part of the construction work required for the Project and the MND's description of the Project's construction duration makes the length of construction time required appear shorter than is actually proposed for the Project. 3-11

3. The Environmental Setting Is Non-Existent

The Environmental Setting Section, which is absent from the MND, fails to adequately disclose what the Applicant proposes to build. The MND should include a Section explaining and clarifying that the analysis of the environmental baseline assumes a built environment with several structures onsite, with the full range of potential/estimated environmental impacts already in existence and occurring onsite. This would help establish what is being analyzed in the MND when disclosing the City's significance conclusions under the various CEQA environmental categories. 3-12

In addition, there is no cumulative project list contained in the Project Description. Please correct these glaring errors and provide an accurate cumulative impact analysis based on a City approved related projects list.

4. Environmental Impacts (Section 3) Are Not Properly Assessed

Those limited environmental impact areas that are studied under the MND are not analyzed properly. The MND either understates identified significant impacts or improperly concludes that impacts are less than significant or that mitigation would reduce impacts to less than significant levels. The flaws as to each of the impact areas discussed in Section 4 of the MND are discussed below.

3.1 Aesthetics 3-13

The Aesthetics Section contains numerous errors, inconsistencies, omissions, and incorrect assumptions and conclusions. They are summarized here.

- The aesthetics impacts of the Project were improperly analyzed. The section does not delve into overall design and compatibility of the building with existing structures and uses in the surrounding area. For example, what are some façade improvements and colors that would complement the area? The overall height

of the structure, listed at 135-feet, seems misleading, as the number does not consider the proposed Penthouse on the roof of the proposed structure. Proposed landscaping should also be discussed and show its compatibility with the neighborhood. With this, what is the actual character of the building and would the structure be compatible with the surrounding character, which is not fully disclosed in the MND. This needs to be expanded. 3-13 cont.

- Regarding shade and shadow sensitive receptors, the MND fails to mention that there exists an outdoor gathering space directly north of the Project Site. According to the *L.A. CEQA Thresholds Guide*, shadow sensitive uses are "facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort or commerce. The *L.A. CEQA Thresholds Guide* calls for a determination of whether there are any shadow-sensitive uses to the north, northwest, or northeast of a project, as that is generally the path shadows will be projected. As such, the MND falls inadequate in this analysis. As mentioned, directly north of the Project Site exists an outdoor gathering/seating/eating location for adjacent office building works. The MND fails to identify this particular area as shadow sensitive use, which it is. This needs to be discussed and disclosed in the MND. 3-14

3.3 Air Quality

The Air Quality Section contains numerous errors, inconsistencies, omissions, and incorrect assumptions and conclusions. They are summarized here.

Construction Air Quality Impacts

- Regarding construction impacts, numerous errors were made with respect to the CalEEMod analysis. These errors resulted in construction air quality impacts being understated. The CalEEMod analysis should be redone using assumptions more consistent with industry standards. Errors and improper assumptions include the following. 3-15

    - The construction phasing in the CalEEMod analysis conflicts with the Project Description. As identified in the MND, early infrastructure work (e.g., storm drain line, retaining wall, shoring) would precede a 22-month construction period. The CalEEMod analysis uses a 22-month process after the initial infrastructure shoring period. Why is that? What effect does this have on the modeled emissions? Are they lower or higher? This must be explained.

    - The CalEEMod air quality analysis assumes a very low level of equipment associated with the construction phases.

- Haul trucks are proposed to stage at Jefferson Boulevard south of the Project Site. A CO hot-spot analysis should have been conducted for this staging location, which is adjacent to heavily congested intersections along Jefferson Boulevard. 3-16

- A health risk assessment should have been conducted to assess potential impacts to neighboring schools. Although the elementary school is greater than 100-feet from the Project Site, construction is anticipated to last 22 months, though could be longer. Given the high level of diesel emissions and the close proximity of an existing elementary school, a health risk assessment should have been completed. What was the reason for not completing one as part of the MND? Health risks to elementary school kids must be addressed. 3-16 cont.

Operational Air Impacts

- Operational air impacts are largely the result of off-site mobile sources. The MND states that "[t]he estimate of total daily trips associated with the Proposed Project was based on the Traffic Impact Analysis prepared ..." As discussed below, the Traffic Impact Study substantially understates the number of daily trips, since it uses solely an office use generation for its trips, when clearly there are restaurant and retail uses proposed. As a result, the emission volumes are also understated. Mobile emissions must be recalculated using the correct number of daily trips. 3-17

- The MND states that the proposed Project would not be a source of toxic air contaminants. This ignores the fact that there will be a substantial increase in truck deliveries to the Project Site as a result of the commercial uses that will now need to be serviced. Exposure to TACs is exacerbated by the Project site's location immediately Playa Vista and north of Jefferson Boulevard. The proposed Project contains office uses and restaurant uses, both sensitive land uses. Accordingly, a mobile health risk assessment should have been conducted for the Project's users to ensure that the proposed "Project is not exposing sensitive receptors to substantial concentrations of DPM." (Id.) Please include such an assessment in the MND or explain why it is not included. 3-18

- The Project could also result in a cumulative air quality impact, which was not disclosed for some reason. The proposed growth in population from the Project could exceed the 2020 projections for the City in the adopted 2012 AQMP. As such, the Project would conflict and obstruct implementation of the applicable, federally-approved air quality attainment plan for the region. This potential impact is not recognized. It should have been. 3-19

3.5 Cultural Resources

The Cultural Resources Section does not provide adequate mitigation to reduce a potential impact to a less than significant level – ultimately failing as an informational document.

The proposed MND mitigation mentions that if cultural resources (including archaeological and paleontological resources) are found on-site during grading and excavation, then a qualified archaeologist/paleontologist will evaluate the find. Given the cultural resources environment near the Playa Vista development south of the Project Site (and surrounding area), this mitigation measure is insufficient to mitigate impacts to a less than significant impact. As found in the Village at Playa Vista Final RS-EIR (August 2009), the longer-term placement of buildings in the area would limit future access to the soils underling the Play Vista Site that have been rated as having archaeologically and paleontologically high impact significance. With this, mitigation measures were required regarding the location of any potential resources to be included in and archived as part of the treatment plan prior to earthwork being performed. Effective mitigation measures should include an on-site monitor during all grading and excavation 3-20

activities. Similarly, a qualified Archaeologist and Paleontologist should be retained to develop and implement a monitoring program for construction activities that could possibly encounter older sedimentary deposits and/or human remains. The qualified Archaeologist and Paleontologist should also attend a pre-grading/excavation meeting to discuss a monitoring program prior to any earthwork being performed. If cultural resources are found, a qualified Archaeologist and Paleontologist must be required to prepare a report regarding the find and its treatment effort to be submitted to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies. This report must include a description of resources unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register.

3-21 cont.

3.6 Geology and Soils

The Geology and Soils Section has many inconsistencies, as detailed below:

- Per the MND, it is unclear if the proposed grading (and subsequent disturbances to existing soil) are fully detailed and explained in the analysis. As proposed, the Project would excavate soil up to 20-feet in depth. This seems unrealistic for a development that is proposing two-levels of underground parking. Each level would typically be roughly 10-feet in depth. This 20-foot depth number seems to not take into account footings and related structural items needed to support a building of the size proposed. What's more, the Geology section states that groundwater may be encountered less than 30-feet in depth, but provides no mitigation in case groundwater is encountered. This seems confusing and misleading. Also, with these inconsistencies, how are we supposed to know if loss of topsoil and ground surface disturbances are accurately disclosed and presented in the MND? This needs to be discussed in more detail in the MND.

3-22

3.7 Greenhouse Gas Emissions

The Greenhouse Gas Emissions Section contains numerous errors, inconsistencies, omissions, incorrect assumptions, and incorrect conclusions – ultimately failing as an informational document. The MND fails to compare the Project's impacts against all applicable climate action plans and policies. When the MND compares the Project's greenhouse gas (GHG) emissions against a draft 2010 threshold of significance raised by SCAQMD Staff during a working group process, it fails to properly conclude that the Project would exceed that draft threshold. The input assumptions used in the CalEEMod analysis also understate potential construction impacts and require updated modeling to properly disclose construction-related impacts. Specific comments are as follows.

3-23

- The Regulatory Setting Section of the MND is cursory, outdated, and inaccurate. Some examples are provided below:

- The MND fails as an informational document because it does not analyze the Project's consistency with Executive Orders S-03-05 and B-30-15. These Executive Orders establish mid-term (2030) and long-term (2050) emission reduction targets for the State. The failure to consider the Project's consistency with the State's climate policy of ongoing emissions reductions reflected in the Executive Orders, which importantly are tied to the atmospheric concentrations of GHGs necessary to stabilize the climate, frustrates the State's climate policy and renders the MND legally deficient and inadequate as an informational document. This analysis must be completed.

- The analysis fails to describe whether the Project incorporates sustainability design features in accordance with regulatory compliance measures to reduce vehicle miles traveled and the Project's potential impact.

- Methane (CH_4) is generally emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[1] With this, for most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[2] Since the Project is in a Methane Zone per ZIMAS, the Greenhouse Gas Emissions section should look closer at this issue and provide additional analysis. 3-23 cont.

- Similar to the Air Quality section of the MND, the CalEEMod estimates are based on inconsistent activity data for mobile sources that should be resolved. These items include:

    - As noted above, the construction phasing in the CalEEMod analysis conflicts with information in the Project Description under the MND.

    - As noted previously, the CalEEMod GHG analysis assumes a very low level of equipment associated with the construction phases.

    - Several consistency statements mention that the Project is providing many retail and commercial uses, all of which would contribute to the policies of encouraging the creation of jobs. Similar to other comments that have been presented, the MND conveniently picks and chooses when to mention that they are proposing commercial uses, when in fact, the Project Description illustrates very little retail.

- The Proposed Project's cumulative contribution to GHG emissions needs to be calculated and presented. As it is written, there is no reasoned analysis or substantial evidence to support the MND's claims that impacts would be less than significant.

3.8 Hazards and Hazardous Materials

As mentioned earlier, the MND does not address methane zone impacts. The Project Site is located within the City of Los Angeles Methane Zone based on the City of Los Angeles Department of City Planning, Zone Information and Map Access System. These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems depending on designation category. A Methane Gas Investigation Report should be conducted. 3-24

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1 *United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003)*

2 *California Air Resources Board, Climate Change Emission Control Regulations, 2004*

The investigation should evaluate existing methane conditions. According to the LADBS, methane mitigation is required for all sites located in a Methane Zone or a Methane Buffer Zone, regardless of results obtained in a methane investigation. The Site is located in a Methane Zone, as discussed above, and appropriate mitigation should be listed to reduce potential impacts. By failing to include this CEQA category from the MND's analysis, the public and decisionmakers are prevented from imposing potentially valuable mitigation measures to reduce the scope of such methane impacts. 3-24 cont.

3.10 Land Use Planning

In general, the MND fails to provide a sufficient level of detail or explanation in order to adequately inform the public and decisionmakers of the Project's consistency with the Land Use Policies and Goals. Most of the consistency findings are limited to a few sentences total. A deeper level of consistency should have been developed and thoroughly explored within the MND, especially for a development of this size and scope.

For example, the MND concludes that the Project is consistent with respect to the Land Use and Conservation Elements based primarily on the conclusion that it would not increase impacts as to these Elements over and above those resulting from the existing uses at the Project Site, or based on the fact that the Project is similar to existing uses. Whats more, Objective 2-1.1 is listed as a consistent approach to commercial development, however, the Proposed Project is mostly Office related uses and does not provide new services to the existing community.

More glaring, it seems that many land use plans and policy documents were left out of the analysis. The table provided in the MND mentions strictly those goals and objectives of the related Community Plan for the area. No mention of the City's Land Use Element, Open Space Element, Safety Element, Public Services Element, and Do Real Planning Guidelines were listed and disclosed. This is a huge oversight. Where is the consistency analysis with the Regional Comprehensive Plan, South Coast Air Quality Management Plan, and others? Also, there is no mention of consistency with the City's LAMC regarding Floor Area Ratio, Open Space, density, parking, and etc. 3-25

These are the types of issues that appear to be missing from and improperly addressed under the analysis in the MND that should be disclosed and considered as part of the land use impact analysis.

3.12 Noise and Vibration

The MND utterly fails to address the fact that there are sensitive receptors that will be significantly impacted from construction noise including the underestimated volume of excavation and the operation of a large parking facility, the loading area and mobile noise from all of the likely vehicles that will have to turn around at the end of the cul-de-sac. To make matters worse, the MND proposes an utterly deficient mitigation measure to address construction noise – Noise XII-27; as complaint line mitigates nothing. 3-26

3.14 Public Services

With regard to Fire Protection Services, the MND fall flat and does not disclose true potential impacts. Is particular, is the Project considered a high-rise structure per LAMC requirements? This is not discussed nor disclosed. This is important since many fire code requirements need to be implemented into the overall design of the Project building. Is a Heli-Pad needed, since the buildings may be considered a high-rise structure? Also, since the Fire Protection Services sections does not provide sufficient detail on existing equipment mix of existing fire stations, are new ladder 3-27

trucks needed, and if so, how many would be required? This could be a potentially significant impact prior to mitigation measures being incorporated. This needs to be disclosed. With this, are sprinklers required on each floor of the building, due to the overall height of the building and distance to the nearest fire station? It seems the MND is deficient in this area and needs to be revised accordingly. 3-27 cont.

3.18 Utilities and Service Systems

The Utilities and Service Systems Section does not provide adequate information and is ultimately failing as an informational document. Our firm's comments on the MND are listed below:

- Projected water during construction use must be calculated based on total water usage and not average daily consumption, similar to how Air Quality impacts are calculated. Since the time period required for construction has been extended, construction activities associated with construction will require greater water consumption. 3-28

- Not only has the duration of construction is confusing, but the extent and intensity of construction is also unclear. There is no analysis regarding the potential for the increased levels of water demand required for the increased amount of excavation required for the Project.

- The forecasted water supplies assume that state mandated conservation requirements will continue to apply throughout the life of the Project. Please provide an analysis of what happens if the current state mandated measures are relaxed or eliminated.

III. CONCLUSION

In our expert opinion, the MND contains substantial inaccuracies and misleads the reader as to the scale and scope of the proposed Project's environmental impacts. Several CEQA sections are absent or non-disclosed, CEQA required sections within the Project Description are missing, among many other things, as discoursed in detail above. Additionally, substantial evidence indicates that the Project may have significant environmental effects on the environment. As a result, an Environmental Impact Report should be required, or, at the very least, the MND should be substantially revised in accordance with our comments and recirculated for further review, consistent with the requirements of CEQA. 3-29

COMMENT LETTER NO. 4

Kimley»Horn

TECHNICAL MEMORANDUM

To:	Ryan Luckert **CAJA Environmental Services, LLC**
From:	Sri Chakravarthy, P.E., T.E. Kimley-Horn and Associates, Inc.
Date:	May 31, 2017
Subject:	NSB 12575 Beatrice Street Traffic Study Peer Review

Kimley-Horn reviewed the Traffic Impact Study for 12575 Beatrice Street Office Project (NSB Project) dated July 11, 2016, which was prepared by Linscott, Law & Greenspan, Engineers (LLG). This brief review was completed for Karney Management. The NSB project is expected to generate 1,946 daily trips with 275 AM peak hour trips and 334 PM peak hour trips. Primary access is being proposed on Jandy Place, which is a two-lane local street cul-de-sac with very limited ability to handle high vehicular traffic.

The study indicates that 75% of the project traffic will be utilizing Jandy Place. It is also understood that all the project delivery and truck access will be off Jandy Place in addition to the proposed food trucks area. It is anticipated that Jandy Place will experience severe congestion during the AM and PM peak periods, potentially creating a hazardous situation including possibly blocking access to emergency vehicles. 4-1

A thorough analysis of this short street segment, as well as Beatrice and Westlawn, should be completed to understand if there are any adverse effects from the proposed project on traffic, pedestrian, and emergency vehicle access. Below is a summary of the traffic study.

1. Study Intersections – The study included analysis of internal intersections adjacent to the project site as well as the following additional intersections.

- Lincoln Boulevard / Marina Pointe Drive – Maxella Avenue
- Lincoln Boulevard / SR-90 Ramps
- Mindanao Way / SR-90 WB Ramps
- Mindanao Way / SR-90 EB Ramps
- Westlawn Avenue / Bluff Creek Drive

4-2

2. NSB site plan shows 3 proposed driveways.

- Per NSB project site plan, the driveway along Beatrice Street is approx. 100' due west of Westlawn Avenue. There is no driveway at Beatrice/Westlawn.
- The driveways along Jandy Place seem to be directly opposing the proposed driveway for Jandy project. They do show that these driveways are the primary access driveways (75% of their project traffic uses this driveway to enter and exit site)
- There is a service driveway at the end of their site on Jandy within the cul-de-sac area but no additional information such as frequency of service vehicles, size of vehicles, etc has been included.

4-3

3. Signal Warrant – NSB traffic study includes four hour and peak hour warrants. The study indicates the following:

- At Jandy/Beatrice, peak hour warrant is met for Future plus Project conditions
- At Westlawn/Beatrice, four-hour warrant is met for Future plus Project conditions

4-4

4. Impacts – NSB study indicates significant project impacts at 3 study intersections. Proposed mitigation measure includes re-striping and signal timing improvements

- Westlawn/Jefferson
- Grosvenor/Jefferson
- Centinela/Campus Center Dr (Jefferson)

4-5

COMMENT LETTER NO. 5

DIGITAL DOMAIN

June 1, 2017

Via E-mail to Jenna.Monterrosa@lacity.org; Nicholas.Hendricks@lacity.org; James.K.Williams@lacity.org

Los Angeles City Planning Commission
200 N. Spring Street
Los Angeles, CA 90012

Re: CPC-2016-1208-CPC/ENV-2016-1209-MND
12575 Beatrice Street (12553–2575 West Beatrice; 5410–5454 S. Jandy)

Honorable Commissioners:

Digital Domain hereby objects to the massively out of scale project presented by NSB Associates, Inc. at 12575 Beatrice Street:

1. Height: The project's height is unlike any other building in this commercial neighborhood where the vast majority of buildings are one to three stories in height. The building occupied by Digital Domain, at 12641 Beatrice Street, is a single-story industrial building, consistent with the other buildings surrounding it. 5-1

2. Character. This neighborhood, made up of low height creative industrial/commercial office spaces, which is what attracted Digital Domain to this space. If the project is constructed at its proposed mass and height, it will permanently change the character of this established community. 5-2

3. Traffic. The current traffic situation along Jandy and Beatrice is far from ideal. The introduction of so much extra traffic will cause further traffic congestion along these streets, both of which are small and end in cul-de-sacs. There is no feasible means to minimize these inevitable traffic impacts but to decrease the number of new vehicles by scaling down the size of the project. 5-3

   In addition to congestion, all of this extra traffic will introduce enormous levels of extra noise and exhaustion fumes. 5-4

4. Neighborhood Development: At the end of Beatrice, 12777 West Jefferson was recently sold. The new owners are building an additional 55,000 sq. ft. building and a 609 stall parking garage. While all their traffic has come in and out of Jefferson, they plan to access the new parking garage from Beatrice, further adding hundreds of new car trips to our street. 5-5

5. Above-Grade Parking. The proposed three stories of above-grade parking will expose all of our customers, employees and visitors to constant noise and toxic exhaust emissions. It will create an eyesore for all persons using/enjoying the outdoor spaces in this area. There is no reason that NSB's desire to maximize profits should outweigh the detriment to surrounding owners' use and enjoyment of their properties. 5-6

6. Shade/Shadow. The height of the building will overshadow the existing spaces. 5-7

This Commission deny should the Project and instruct NSB to work with its surrounding neighbors to achieve a more compatible project.

Allen Mesropy,
Facility Operations Manager

COMMENT LETTER NO. 6

Jay Farbstein, PhD, FAIA
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June 1, 2017

VIA EMAIL (Jenna.Monterrosa@lacity.org; Nick.Hendricks@lacity.org; James.K.Williams@lacity.org)

City Planning Commission
Attn: Jenna Monterrosa, City Planner
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Re: CPC-2016-1208-CU-SPR/ENV-2016-1209-MND
12575 Beatrice Street (12553-12575 West Beatrice Street; 5410-5454 S. Jandy Place)

Honorable Commissioners:

I am writing in strong opposition to the 155-foot high office building proposed at 12575 Beatrice Street.

My family and our partners have owned the properties at 5415 Jandy and 12615 Beatrice – directly across the street from the Project – for almost 50 years. My father, Milton Farbstein, built the buildings with his partner David Karney in 1969. Since that time, we have owned and operated the buildings, taking pride in what our fathers created. I personally decided to become an architect as a result of the passion for building this legacy instilled in me. As part of my practice, I am a consultant to the Rudy Bruner Award in Urban Excellence, which I helped to conceive and conduct for over 30 years. I know what good urban design is about (and participated in granting a Silver Medal to one of this architect's projects in Chicago) – and it is my firm and considered opinion that the proposed Project violates fundamental planning and design principles. 6-1

This neighborhood is in transition in a very positive way and is attracting much more creative functions and users. The "creative class" will be appalled by the out-of-scale insult that is proposed. At 155 feet tall and with a massive quantity of space, occupants and cars, the Project will contribute to destroying the attraction that has developed over recent years and devalue our property, destroying the emerging creative community character.

Despite being designed by a quintessentially famous architect, this project is grossly out of scale with the neighborhood and is poorly conceived in terms of massing, location of functions, and how it meets the street (for example, our properties will face a three level parking garage). Its scale and massing speak of one thing only and that is greed – trying to get far more building than should ever be allowed on this site. The architect should go back to the drawing board and redesign a project in harmony with its surroundings, based on sound planning principles. We all know that the architect can do this if the developers will let him – and it's up to you, Commissioners, to hold their feet to the fire. One way you can do that is to require a normal environmental review and not agree to a short-cut Negative Declaration that would be outrageously applied to a project with the massive negative impacts that this one obviously will inflict on its surroundings. The other is by rejecting out of hand the Project as proposed. 6-2

Therefore, I ask that the Commission preserve this low scale, industrial/creative community that my family has worked so hard to create and deny this Project.

Sincerely,

Jay Farbstein

Jay Farbstein, PhD, FAIA

Del Rey
Residents Association
Since 1972

Post Office Box 661450 – Los Angeles, CA 90066
www.delreyhome.org

May 15, 2017

VIA EMAIL:
Jennafer.Monterrosa@planning.lacity.org

Re: 12575 Beatrice Street
Case No: CPC-2016-1208-CU-SPR
Hearing Date per public notice: May 17, 2017, 3:30 p.m., City Hall

Dear Ms. Monterrosa:

Representatives of the applicant first presented the project to our board in March 2016, and on May 1, 2017, they presented the revised design. Although there are some redeeming qualities offered by this development, the Del Rey Residents Association opposes this project for the following reasons: 7-1

1. **Height**. Although the revised design is not as tall as the initial design, at 135 feet it is still substantially taller than any other building in Del Rey or in neighboring Playa Vista. The result of allowing consolidation of five lots is that the height of this project is grossly incompatible with the neighborhood. It will be a striking and jarring contrast to nearby property and sets a very bad precedent for future developments, which are waiting to see what happens here. 7-2

   This project needs to be constrained to a height that is no taller than the tallest building in the area, which is 88'. That project is the 12655 Jefferson Blvd. building, which the Applicant inaccurately presented to the community as 110' tall.

2. **Severe Population Growth.** Due to the size of this project, it will add up to 1,000 new occupants to this neighborhood. Such drastic growth brings problems that cannot be mitigated because this area has very limited vehicular and transportation access. It has 3 dead-end streets and only 2 intersections that connect back into the local street system. Some of the problems that will come with the added population load are: 7-3

   a. **Traffic Load** – Even though traffic studies have been provided, we believe that the data is biased and that an impartial party should undertake a more objective study, which will reveal the real impact of this project in combination with all of the other recent and potential developments nearby. 7-4

   b. **Traffic Management** – This project needs to provide and maintain a comprehensive TDM (Transportation Demand Management) plan. Although due to its size, it is not required; there are, however, special circumstances at this location to consider. 7-5

c. **Emergency Evacuation** – Because of the street pattern here (Del Rey's Area 'H'), an impartial and comprehensive study of egress from this neighborhood in an emergency situation must be completed prior to any approval of this type. 7-6

d. **Utilities/Infrastructure.** –The city's infrastructure cannot handle this much local population boom. There have been frequent power outages in this area. Roadways, specifically Jefferson Boulevard, are not maintained and improved properly. We are in a tenuous situation with future availability of water, and our water mains are aging. Until the City makes the commitment to upgrade our infrastructure to keep up with development, this project will dramatically add to our infrastructure crisis. 7-7

3. **Non-binding Restrictions.** We recognize that the developer is applying the allowable FAR from multiple adjoining parcels of land in order to allow this much development in this location. Our experience shows that Approval Conditions that limit future expansion are too easily overturned or not enforced. We have little confidence that the undeveloped portions of this property will not be developed later. 7-8

   There must be a more permanent and binding way of guaranteeing that no further densification will occur on the other parcels that are part of this project. 7-9

This letter was prepared by our Land Use and Planning Committee and approved by a quorum of our Board of Directors on May 15, 2017.

Very truly yours,

Elizabeth A. Pollock

Elizabeth A. Pollock
President

cc: Kevin Mansfield, NSB Associates
Michael S. Chait, Chait & Company, Inc.
Clare Bronowski, Glaser Weil
Tensho Takemori, Gehry Partners, LLP
Samuel A. S. Gehry, Gehry Partners, LLP
Tom Rothmann, re:code LA
Del Rey Neighborhood Council board
Councilmember Mike Bonin, C.D. 11
Chuy Orozco, C.D. 11 Del Rey deputy
Ezra Gale, C.D. 11 senior planner (projects)

Attachment B:

Linscott Law & Greenspan, Engineers,
Response to Kimley-Horn Comment Memo
12575 Beatrice Street Office Project

MEMORANDUM

To:	Terry A. Hayes Associates Inc.	Date:	June 22, 2017
From:	David S. Shender, P.E. Linscott, Law & Greenspan, Engineers	LLG Ref:	5-15-0218-1
Subject:	**Response to Kimley-Horn Comment Memo 12575 Beatrice Street Office Project**		

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This memorandum has been prepared by Linscott, Law & Greenspan, Engineers (LLG) to provide a response to the comments outlined in the memorandum[1] submitted by Kimley-Horn (the "K-H memo") related to the traffic study prepared for the proposed office project at 12575 Beatrice Street (the "Project"). The K-H memo is attached hereto and the comments therein bracketed for reference in providing responses. LLG prepared the traffic study[2] for the proposed office project (the "LLG traffic study"), as well as a supplemental analysis[3] evaluating the currently proposed project site plan (the "LLG supplemental traffic analysis"). LADOT reviewed and analyzed the LLG traffic study and LLG supplemental traffic analysis and issued assessment letters[4] validating the analysis.

Response to Comment No. 1

The comment restates the Project trip generation provided in Table 7-1, Page 31 of the LLG traffic study. The statement in the K-H memo regarding "…75% of project traffic will be utilizing Jandy Place…" is not correct. The assignment of project traffic as provided in the LLG traffic study was augmented by the LLG supplemental traffic analysis, which evaluated the currently proposed Project design feature which will provide two driveways on Beatrice Street and two driveways on Jandy Place. It is expected that project traffic will equally utilize the driveways on Beatrice Street and Jandy Place (i.e., a 50%/50% split of Project traffic between Beatrice Street and Jandy Place).

The comment accurately states that project delivery and truck access will be off of Jandy Place. This truck access will be through a drive aisle shielded from neighboring uses and provides adequate space for trucks to turn around.

[1] *NSB 12575 Beatrice Street Traffic Study Peer Review*, Kimley-Horn, May 31, 2017
[2] *12575 Beatrice Street Office Project*, LLG, July 11, 2016
[3] *12575 Beatrice Street Office Project – Project Driveway Traffic Analysis Addendum*, LLG, October 6, 2016
[4] *Traffic Impact Assessment for the Proposed Office Project to be Located at 12575 Beatrice Street*, LADOT, November 21, 2016 & June 6, 2017;

The claim in the comment that Jandy Place "…will experience severe congestion during the AM and PM peak periods, potentially creating a hazardous situation including possibly blocking access to emergency vehicles…" is a mere assertion made without data or analysis to support this assertion. This assertion also does not reflect the thorough analysis provided in the LLG traffic study and LLG supplemental traffic analysis.

Based on traffic count data provided in Appendix C of the LLG traffic study, currently 69 cars (61 northbound, 8 southbound) use Jandy Place in the AM peak hour. Similarly, 83 cars currently use Jandy Place in the PM peak hour (14 northbound, 69 southbound). The Project is forecast to add 138 trips to Jandy Place in the AM peak hour (121 inbound, 17 outbound) and 167 trips in the PM peak hour (28 northbound, 139 southbound).

In total, Jandy Place is forecast to accommodate 207 trips in the AM peak hour and 250 trips in the PM peak hour. This is equivalent to approximately 4 cars per minute using Jandy Place during the peak hours of traffic following construction and occupancy of the Project. The potential use of Jandy Place by one car every approximately 15 seconds does not constitute a "hazardous situation" or an impediment to emergency vehicle access as asserted in the K-H memo.

Further, Table 1 within the LLG supplemental traffic analysis provides a summary of the Level of Service calculations for the Project's Jandy Place driveways in the Existing + Project and Future + Project conditions. As shown in Table 1, a driveway balance assuming a 50/50 split of Project traffic to Jandy Place and Beatrice Street would result in LOS A and B conditions at the Jandy Place driveways during the weekday AM and PM peak hours, respectively. The average wait time for a motorist exiting the garage onto Jandy Place would be less than 10 seconds in the AM peak hour and less than 11 seconds during the PM peak hour in the Future + Project condition. This rate of egress does not constitute "severe congestion" as asserted in the K-H memo.

In addition, LADOT has recommended implementation of the Applicant's proposed voluntary safety measure to close the Jandy Place ingress and egress during peak weekday lunch hours. To enhance pedestrian safety along Jandy Place, the Project's Jandy Place ingress and egress will be closed weekdays between 12:30 PM and 1:30 PM. Also, in connection with the already-agreed upon future traffic signal warrant analysis, the Applicant has agreed to submit an analysis of Jandy Place driveway operations after one year of Project operation to assess peak hour traffic flows, obtain LADOT review, and adjust driveway operations if warranted.[5]

[5] *Supplemental Traffic Measures Memorandum for the Proposed Office Project to be Located at 12575 Beatrice Street*, LADOT, June 6, 2017.

In summary, based on the data, analysis, and findings provided in the LLG traffic study and LLG supplemental traffic analysis, all motorists on Jandy Place will experience little to no delay in the future following construction and occupancy of the Project. No further analysis of the Jandy Place cul-de-sac is warranted.

Response to Comment No. 2

The comment lists five of the study intersections evaluated in the LLG traffic study. In fact, the potential traffic impacts of the Project were evaluated at 26 off-site intersections, plus two additional intersections (Jandy Place/Beatrice Street and Westlawn Avenue/Beatrice Street) for traffic signal warrants. Thus, a total of 28 intersections were comprehensively evaluated within the LLG traffic study. The list of study intersections is provided on Pages 7 and 8 of the LLG traffic study.

Response to Comment No. 3

The comment provides a discussion of the Project driveways. See Response to Comment No. 1, above, which clarifies that the current Project site plan includes two driveways on Jandy Place and two driveways on Beatrice Street, resulting in a forecast assignment of 50% of Project traffic to Beatrice Street. Contrary to the statement in the comment regarding service vehicle access, the LLG traffic study (Page 6) provides a discussion regarding access for service vehicles, including anticipated size and type of vehicles. While the precise number of service vehicles cannot be forecast, it is reasonable to expect that the number of vehicles would be similar to an office building of similar size.

Response to Comment No. 4

The comment correctly summarizes the analysis and findings of the traffic signal warrants analysis provided in the LLG traffic study prepared for the Jandy Place/Beatrice Street and Westlawn Avenue/Beatrice Street intersections (see, for example, Table 13-1 on Page 63 of the LLG traffic study). Further, LADOT recommended on Page 4 of its assessment letter[6] prepared for the Project that the two intersections should be monitored for a period of three years following 80% occupancy of the Project, with a traffic signal installed at one or both locations if determined to be warranted by LADOT.

[6] *Traffic Impact Assessment for the Proposed Office Project to be Located at 12575 Beatrice Street*, LADOT, June 6, 2017

LINSCOTT LAW & GREENSPAN engineers

Response to Comment No. 5

The comment correctly summarizes the analysis and findings of the off-site traffic impact analysis provided in the LLG traffic study prepared for the 28 study intersections (see, for example, Table 9-1 on Pages 39 and 40 of the LLG traffic study). The LLG traffic study identifies significant traffic impacts due to the Project at the three intersections listed in the comment. Mitigation measures for the three intersections are provided in the LLG traffic study on Page 52 through 56, and incorporated into the Mitigated Negative Declaration prepared for the Project. The mitigation measures are also restated on Page 4 of the LADOT assessment letter. With implementation of the recommended traffic mitigation measures, the traffic impacts of the Project would be reduced to levels of insignificance.

cc: File

Kimley»Horn

New

TECHNICAL MEMORANDUM

To: Ryan Luckert
CAJA Environmental Services, LLC

From: Sri Chakravarthy, P.E., T.E.
Kimley-Horn and Associates, Inc.

Date: May 31, 2017

Subject: NSB 12575 Beatrice Street Traffic Study Peer Review

Kimley-Horn reviewed the Traffic Impact Study for 12575 Beatrice Street Office Project (NSB Project) dated July 11, 2016, which was prepared by Linscott, Law & Greenspan, Engineers (LLG). This brief review was completed for Karney Management. The NSB project is expected to generate 1,946 daily trips with 275 AM peak hour trips and 334 PM peak hour trips. Primary access is being proposed on Jandy Place, which is a two-lane local street cul-de-sac with very limited ability to handle high vehicular traffic.

The study indicates that 75% of the project traffic will be utilizing Jandy Place. It is also understood that all the project delivery and truck access will be off Jandy Place in addition to the proposed food trucks area. It is anticipated that Jandy Place will experience severe congestion during the AM and PM peak periods, potentially creating a hazardous situation including possibly blocking access to emergency vehicles. 1

A thorough analysis of this short street segment, as well as Beatrice and Westlawn, should be completed to understand if there are any adverse effects from the proposed project on traffic, pedestrian, and emergency vehicle access. Below is a summary of the traffic study.

1. Study Intersections – The study included analysis of internal intersections adjacent to the project site as well as the following additional intersections. 2

- Lincoln Boulevard / Marina Pointe Drive – Maxella Avenue
- Lincoln Boulevard / SR-90 Ramps
- Mindanao Way / SR-90 WB Ramps
- Mindanao Way / SR-90 EB Ramps
- Westlawn Avenue / Bluff Creek Drive

2. NSB site plan shows 3 proposed driveways.

- Per NSB project site plan, the driveway along Beatrice Street is approx. 100' due west of Westlawn Avenue. There is no driveway at Beatrice/Westlawn.
- The driveways along Jandy Place seem to be directly opposing the proposed driveway for Jandy project. They do show that these driveways are the primary access driveways (75% of their project traffic uses this driveway to enter and exit site)
- There is a service driveway at the end of their site on Jandy within the cul-de-sac area but no additional information such as frequency of service vehicles, size of vehicles, etc has been included.

3

3. Signal Warrant – NSB traffic study includes four hour and peak hour warrants. The study indicates the following:

- At Jandy/Beatrice, peak hour warrant is met for Future plus Project conditions
- At Westlawn/Beatrice, four-hour warrant is met for Future plus Project conditions

4

4. Impacts – NSB study indicates significant project impacts at 3 study intersections. Proposed mitigation measure includes re-striping and signal timing improvements

- Westlawn/Jefferson
- Grosvenor/Jefferson
- Centinela/Campus Center Dr (Jefferson)

5

Attachment C:

Revised Los Angeles Department of Transportation Traffic Impact Assessment for the Proposed Office Project to be Located at 12575 Beatrice Street

CITY OF LOS ANGELES

INTER-DEPARTMENTAL MEMORANDUM

12575 Beatrice Street
DOT Case No. CTC15-103799

DATE: June 6, 2017

TO: Karen Hoo, City Planner
Department of City Planning

FROM: Hamed Sandoghdar, Transportation Engineer
Department of Transportation

SUBJECT: **TRAFFIC IMPACT ASSESSMENT FOR THE PROPOSED OFFICE PROJECT TO BE LOCATED AT 12575 BEATRICE STREET**

Pursuant to the Coastal Transportation Corridor Specific Plan (CTCSP), Ordinance No. 168,999, the Department of Transportation (DOT) has completed the traffic assessment of the proposed Office Project, to be located at 12575 Beatrice Street. This traffic assessment is based on the traffic impact analysis report prepared by Linscott, Law & Greenspan, dated July 11, 2016 and subsequent report discussions through November 2016. After a 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 would construct an office campus consisting of 199,500 square-feet (sf) of floor area. The project site is currently occupied by an office building consisting of 23,072 sf of floor area, which would be removed. Vehicular access to the Project will be provided via Beatrice Street and Jandy Place adjacent to the Project's southerly and westerly frontages, respectively. Full buildout of the project is anticipated to be completed by the year 2018.

DISCUSSION AND FINDINGS

Trip Generation

The proposed project is estimated to generate a net increase of 1,946 daily trips, a net increase of 275 A.M. peak hour trips, and a net increase of 334 P.M. peak hour trips. The trip generation rates are based upon Appendix "A" of the CTCSP and formulas published by the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition, 2012. A copy of the project study trip generation table (Table 7-1) is provided as **Attachment "A"** to this report.

Traffic Impacts

Based on DOT's traffic impact criteria[1], the proposed project is expected to impose a significant level impact at three (3) of the twenty six (26) study intersections in one or both analysis scenarios (existing year 2016 or future year 2018), as shown in the report's summary of volume-to-capacity (V/C) ratios and levels of service (LOS) table (Table 9-1). A copy of the project study LOS summary table is provided as **Attachment "B"** to this report.

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1 Per the DOT Traffic Study Policies and Procedures, a significant impact is identified as an increase in the Critical Movement Analysis (CMA) value, due to project related traffic, of 0.01 or more when the final ("with project") Level of Service (LOS) is LOS E or F; an increase of 0.020 or more when the final LOS is LOS D; or an increase of 0.040 or more when the final LOS is LOS C.

The potentially impacted intersections are as follows:

1. Westlawn Avenue & Jefferson Boulevard (#12)
2. Grossvenor Boulevard & Jefferson Boulevard (#13)
3. Campus Center Drive / Centinela Avenue & Jefferson Boulevard (#17)

In order to address the identified project impact at locations 1 through 3 listed above, the project has proposed the implementation of various physical improvements.

The project impact analysis also included a review of the two (2) stop sign controlled intersections nearest the project site to determine if the addition of project traffic would trigger the need for signalization at these locations. Based on the minimum volume thresholds defined in the Manual of Uniform Traffic Control Devices (MUTCD), the combination of existing conditions plus project trips does not meet the minimum threshold for consideration of signalization. However, under the review of project trips plus future growth, the analysis concluded that signalization may be needed at both locations. A copy of the study warrant analysis summary table (Table 13-1) is provided as **Attachment "C"** to this report.

Congestion Management Program (CMP)

The CMP traffic impact analysis (TIA) guidelines require that intersection monitoring locations must be examined if the proposed project will add 50 or more trips to the intersection during either the A.M. or P.M. weekday peak hours. The nearest CMP monitoring stations are the intersections of Lincoln & Manchester and Lincoln & State Route 90 Expressway, located approximately 1.5 miles from the project site. As shown in Figure 7-2 and Figure 7-3 in the traffic study report, the proposed Project would only add 28 AM peak hour trips and 34 PM peak hour trips to the Lincoln Boulevard/Manchester Avenue intersection and would only add 21 AM peak hour trips and 27 PM peak hour trips to the Lincoln Boulevard/Marina Expressway (SR90) intersection. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required. The nearest freeway monitoring station is located on Interstate 405 north of La Tijera Boulevard. The CMP TIA guidelines require that freeway monitoring locations must be examined if the proposed project will add 150 or more trips to the intersection during either the AM or PM weekday peak hours. Again, as shown in Figure 7-2 and Figure 7-3, the proposed project will not add 150 or more trips (in either direction) during either the AM or PM weekday peak hours to the CMP freeway monitoring location. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required. A copy of the referenced Figures 7-2 and 7-3 is provided as **Attachment "D"** to this report.

Freeway Screening Analysis

To comply with the Freeway Analysis Agreement executed between Caltrans and LADOT in October 2013, the study also included a screening analysis to determine if additional evaluation of freeway mainline and ramp segments was necessary. Exceeding one of the four screening criteria would require the applicant to work directly with Caltrans to prepare a more detailed freeway analysis. However, the project did not meet or exceed any of the four thresholds defined in the agreement; therefore, no additional freeway analysis is deemed required at this time. A copy of the project Freeway Segment and Off-Ramp Screening Process summary table (Table 15-1) is provided as **Attachment "E"** to this report.

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.

A. Covenant and Agreement

Pursuant to Section 5.B of the CTCSP, 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.

B. Transportation Impact Assessment (TIA) Fee

Pursuant to Section 6 of the CTCSP, an applicant for a project within the Specific Plan area, except as exempted, shall pay, or guarantee payment of, a TIA Fee prior to issuance of any building permit. In accordance with this directive, the project shall remit payment of the applicable TIA fee amount, specified below, prior to issuance of any building permit:

<u>Proposed Use</u>	
Trip rate for office building @ 199,500 sq-ft	= 2.0 trips / 1,000 sq-ft
Trip Generated by proposed office space	= 199,500 sq-ft x 2.0 trips / ksf = 399 trips
Current trip Cost Factor for CTCSP	= $8,643 per trip*
Propose office TIA fee [$8,643 per trip x 399 trips]	= *$3,448,557.00*
<u>Previous/Existing Use for TIA fee Trip Credit</u>	
Trip rate for office building @ 23,072 sq-ft	= 2.8 trips / 1,000 sq-ft
Trip Generated by previous/existing office space	= 23,072 sq-ft x 2.8 trips / ksf = 65 trips
Current trip Cost Factor for CTCSP	= $8,643 per trip*
Previous/Existing Office use TIA fee credit [$8,643 per trip x 65 trips]	= *$561,795.00*
TIA fee [$3,448,557.00 - $561,795.00]	=**<u>$2,886,762.00</u>****

*Pursuant to Section 6.D of the CTCSP, the Trip Cost Factor shall be increased (or decreased) as of January 1 of each year by the amount of the percentage increase (or decrease) in the most recently available City Building Code Index, as determined by DOT. Therefore, the actual TIA Fee may vary depending upon when payment is made to DOT.

**The final TIA Fee due will be dependent upon the final configuration/dimension of the proposed project and applicable per trip fee at time of remittance.

C. Highway Dedication and Physical Street Improvements

Pursuant to Section 5.D.2 of the CTCSP, the applicant may be required to implement the following improvements in order to fully mitigate the traffic impact identified as the following locations:

1. Jefferson Boulevard & Westlawn Avenue: Design and implement a dual left-turn operation for the southbound approach to the intersection. Re-stripe and modify the traffic signal operation of the intersection as needed.

2. Grosvenor Boulevard & Jefferson Boulevard: Design and implement a dual left-turn operation for the southbound approach to the intersection. Final configuration for the approach would be 1 left-turn lane and 1 shared left-turn/right-turn lane. Re-stripe and modify the traffic signal operation of the intersection as needed.

3. Campus Center Drive/Centinela Avenue & Jefferson Boulevard: Design and implement a dual right-turn operation for the southbound approach to the intersection. Final configuration for the approach would be 2 left-turn lanes, 1 through lane and 2 right-turn lanes. Re-stripe and modify the traffic signal operation of the intersection as needed. Inasmuch as the southbound approach to the intersection resides primarily within the jurisdiction of Los Angeles County, the Applicant shall be responsible for securing written approval from said jurisdiction regarding the implementation of this improvement.

4. Traffic Signal Implementation - In order to insure full and appropriate redress for potential access / circulation conditions, the project shall covenant and agree to implement traffic signalization at the following locations:
   a. Jandy Place & Beatrice Street
   b. Westlawn Avenue & Beatrice Street

   The term of the covenant shall begin with the project's first year of 80% occupancy and shall continue for three (3) consecutive years (of minimum 80% occupancy). The project shall conduct and submit annual supplemental traffic signal warrant analyses, for each location, to DOT for review. If deemed warranted, the project shall assume full responsibility for implementing the signal(s), subject to the Shared Mitigation provision below at Paragraph D.

Should any improvement be deemed infeasible at the time of reconciliation, the City may substitute an alternative measure of equivalent effectiveness.

The applicant should check with the Bureau of Engineering's (BOE) Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project. These requirements must be guaranteed before issuance of any building permit through the B-permit process of the Bureau of Engineering, Department of Public Works. They must be constructed prior to issuance of any certificate of occupancy to the satisfaction of DOT and the Bureau of Engineering. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordination Engineer at (213) 972- 8685, to arrange a pre-design meeting to finalize the plan(s) needed for the project.

D. Shared Mitigation

Consistent with DOT policies, the cost of traffic mitigation measures can be shared between two or more development projects, provided that the mitigation can fully mitigate the combined impact of these projects. This would be applicable in those cases where there are

other proposed developments in the vicinity that may also contribute toward the cost of the improvement. Submission of analysis regarding the fair share cost for each development assigned to the mitigation shall be the responsibility of the respective parties involved and subject to final review and determination by LADOT.

E. Transportation Demand Management Plan and Monitoring (TDMP&MP)

Pursuant to Section 5G of the CTCSP, and in order to insure full and appropriate redress for potential access / circulation conditions, the applicant shall submit to DOT a Transportation Demand Management (TDM) Plan designed to achieve a progressive average vehicle ridership (AVR) reduction, as determined by DOT. The measurement of actual trips and monitoring shall be conducted using an automated detection and surveillance monitoring system. In addition to providing hourly vehicular count tabulations, the monitoring system shall also be designed in a manner that will permit direct data access to DOT staff. The installation and maintenance of the monitoring system shall be at the Project's expense. The monitoring program shall continue until such time that the Project has shown, for five consecutive years, at a minimum of 80% occupancy, achievement of the progressive AVR reduction. Should the review show that an AVR reduction has not been achieved, the project shall be subject to a penalty program, to be developed in consultation with LADOT, including an extension of the monitoring review period.

A full detailed description of the TDMP, and all subsequent MP reporting, should be prepared by a licensed Traffic Engineer and submitted to DOT for review. The TDMP should be submitted to DOT and the Department of City Planning for review and approval, prior to the issuance of any certificate of occupancy.

The TDM Plan should include a variety of measures to reduce single occupant vehicle (SOV) trips by increasing the number of walking, bicycling, carpool, vanpool, and transit trips. The project shall also comply with Section 12.26-J (Ordinance 168,700) of the Los Angeles Municipal Code which requires specific TDM and trip reduction measures. The TDM program should include, but is not limited to, the following strategies:

- Provide a dedicated shuttle service;
- Provide and internal Transportation Management Coordination Program with on-site transportation coordinator;
- Implement enhanced pedestrian connections (e.g., improve sidewalks, widen crosswalks adjacent to the project, install wayfinding signage and pedestrian level lighting, etc.);
- Design the project to ensure a bicycle, pedestrian and transit friendly environment;
- Coupled with unbundled parking, provide on-site car share amenities;
- Provide rideshare program and support for project employees and tenants;
- Allow for subsidized transit passes for eligible project employees and tenants;
- Coordinate with DOT to determine if the site would be eligible for one or more of the services to be provided by the future Mobility Hubs program (secure bike parking, bike share kiosks, and car-share parking spaces);
- Provide on-site transit routing and schedule information;
- Contribute a one-time fixed fee into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the area of the proposed project. Amount of fee to be

determined in consultation with DOT and Council District 11 staff.

- Guaranteed Ride Home Program

To the extent possible, the TDM plan should also include opportunities for coordination with the area adjacent Transportation Management Organizations (TMO's) including Playa Vista and the Howard Hughes Center.

F. Site Access and Internal Circulation

This determination does not include approval of the 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. In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts, for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. New driveway should be Case 2 driveways and 30 feet and 16 feet width for two-way and one-way operations, respectively.

G. Parking Requirements

The applicant should check with the Department of Building and Safety on the number of Code- required parking spaces needed for the project.

H. 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.

I. Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT to permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

DOT ASSESSMENT APPEAL PROCESS

Pursuant to Section 9.A of the CTCSP, an applicant or any other interested person adversely affected by the modified 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 contact me or Pedro Ayala at the DOT West L.A. Planning Office at (213) 485- 1062.

HS:SH

Attachments

cc: Eleventh Council District
Sean Haeri, Mohammad Blorfroshan, DOT
David Weintraub, DCP
Mike Patonai, BOE
Los Angeles County
David Shender, LLG Engineers

Table 7-1
PROJECT TRIP GENERATION [1]

09-Jun-16

LAND USE	SIZE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL	IN	OUT	TOTAL
Proposed Project								
Office Building [3]	199,500 GSF	2,200	274	37	311	68	331	399
Existing Land Use								
Office Building [3]	(23,072) GSF	(254)	(32)	(4)	(36)	(11)	(54)	(65)
NET INCREASE		**1,946**	**242**	**33**	**275**	**57**	**277**	**334**

[1] Source: ITE "Trip Generation", 9th Edition, 2012.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 710 (General Office Building) trip generation average rates.
- Daily Trip Rate: 11.03 trips/1,000 square feet of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 1.56 trips/1,000 square feet of floor area; 88% inbound/12% outbound
- PM Peak Directional Distribution: 17% inbound/83% outbound
PM Peak Hour Trip Rate is based on the Coastal Transportation Corridor Specific Plan for Commercial Office under 100,000 sq. ft.
- PM Peak Hour Trip Rate: 2.8 trips/1,000 SF of floor area
PM Peak Hour Trip Rate is based on the Coastal Transportation Corridor Specific Plan for Commercial Office over 100,000 sq. ft.
- PM Peak Hour Trip Rate: 2.0 trips/1,000 SF of floor area

Table 9-1
SUMMARY OF VOLUME TO CAPACITY RATIOS
AND LEVELS OF SERVICE
CITY OF LOS ANGELES INTERSECTIONS

14-Jun-16

NO.	INTERSECTION	PEAK HOUR	[1] YEAR 2016 EXISTING V/C	LOS	[2] YEAR 2016 EXISTING W/ PROJECT V/C	LOS	CHANGE V/C [(2)-(1)]	SIGNIF. IMPACT [a]	[3] YEAR 2018 FUTURE PRE-PROJECT V/C	LOS	[4] YEAR 2018 FUTURE W/ PROJECT V/C	LOS	CHANGE V/C [(4)-(3)]	SIGNIF. IMPACT [a]	[5] YEAR 2018 W/ PROJECT MITIGATION V/C	LOS	CHANGE V/C [(5)-(3)]	MITI-GATED
1	Lincoln Boulevard / Marina Pointe Drive – Maxella Avenue	AM	0.627	B	0.629	B	0.002	NO	0.707	C	0.709	C	0.002	NO	0.709	C	0.002	----
		PM	0.616	B	0.621	B	0.005	NO	0.720	C	0.725	C	0.005	NO	0.725	C	0.005	----
2	Lincoln Boulevard / SR-90 Ramps	AM	0.702	C	0.703	C	0.001	NO	0.823	D	0.823	D	0.000	NO	0.823	D	0.000	----
		PM	0.715	C	0.721	C	0.006	NO	0.871	D	0.875	D	0.004	NO	0.875	D	0.004	----
3	Lincoln Boulevard / Fiji Way	AM	0.776	C	0.784	C	0.008	NO	0.867	D	0.876	D	0.009	NO	0.876	D	0.009	----
		PM	1.457	F	1.459	F	0.002	NO	1.577	F	1.581	F	0.004	NO	1.581	F	0.004	----
4	Lincoln Boulevard / Jefferson Boulevard	AM	0.841	D	0.843	D	0.002	NO	0.920	E	0.921	E	0.001	NO	0.921	E	0.001	----
		PM	0.715	C	0.724	C	0.009	NO	0.866	D	0.875	D	0.009	NO	0.875	D	0.009	----
5	Lincoln Boulevard / Manchester Avenue	AM	0.803	D	0.814	D	0.011	NO	0.883	D	0.893	D	0.010	NO	0.893	D	0.010	----
		PM	0.699	B	0.706	C	0.007	NO	0.835	D	0.843	D	0.008	NO	0.843	D	0.008	----
6	Mindanao Way / SR-90 WB Ramps	AM	0.583	A	0.586	A	0.003	NO	0.656	B	0.660	B	0.004	NO	0.660	B	0.004	----
		PM	0.653	B	0.654	B	0.001	NO	0.802	D	0.803	D	0.001	NO	0.803	D	0.001	----
7	Mindanao Way / SR-90 EB Ramps	AM	0.804	D	0.809	D	0.005	NO	0.894	D	0.898	D	0.004	NO	0.898	D	0.004	----
		PM	0.827	D	0.828	D	0.001	NO	0.896	D	0.897	D	0.001	NO	0.897	D	0.001	----
8	Playa Vista Drive / Jefferson Boulevard	AM	0.584	A	0.600	A	0.016	NO	0.659	B	0.675	B	0.016	NO	0.675	B	0.016	----
		PM	0.553	A	0.565	A	0.012	NO	0.645	B	0.657	B	0.012	NO	0.657	B	0.012	----
9	Culver Boulevard / SR-90 WB Ramps	AM	0.680	B	0.689	B	0.009	NO	0.787	C	0.796	C	0.009	NO	0.796	C	0.009	----
		PM	0.768	C	0.771	C	0.003	NO	0.888	D	0.895	D	0.007	NO	0.895	D	0.007	----
10	Culver Boulevard / SR-90 EB Ramps	AM	0.409	A	0.417	A	0.008	NO	0.481	A	0.489	A	0.008	NO	0.489	A	0.008	----
		PM	0.421	A	0.421	A	0.000	NO	0.441	A	0.441	A	0.000	NO	0.441	A	0.000	----
11	McConnell Avenue / Jefferson Boulevard	AM	0.443	A	0.445	A	0.002	NO	0.530	A	0.532	A	0.002	NO	0.532	A	0.002	----
		PM	0.420	A	0.434	A	0.014	NO	0.513	A	0.527	A	0.014	NO	0.527	A	0.014	----
12	Westlawn Avenue / Jefferson Boulevard	AM	0.357	A	0.448	A	0.091	NO	0.533	A	0.624	B	0.091	NO	0.608	B	0.075	----
		PM	0.525	A	0.622	B	0.097	NO	0.742	C	0.840	D	0.098	YES	0.764	C	0.022	YES

Table 9-1 (Continued)
SUMMARY OF VOLUME TO CAPACITY RATIOS
AND LEVELS OF SERVICE
CITY OF LOS ANGELES INTERSECTIONS

14-Jun-16

NO.	INTERSECTION	PEAK HOUR	[1] YEAR 2016 EXISTING V/C	LOS	[2] YEAR 2016 EXISTING W/ PROJECT V/C	LOS	CHANGE V/C [(2)-(1)]	SIGNIF. IMPACT [a]	[3] YEAR 2018 FUTURE PRE-PROJECT V/C	LOS	[4] YEAR 2018 FUTURE W/ PROJECT V/C	LOS	CHANGE V/C [(4)-(3)]	SIGNIF. IMPACT [a]	[5] YEAR 2018 W/ PROJECT MITIGATION V/C	LOS	CHANGE V/C [(5)-(3)]	MITI-GATED
13	Grosvenor Boulevard /	AM	0.479	A	0.519	A	0.040	NO	0.591	A	0.631	B	0.040	NO	0.580	A	-0.011	----
	Jefferson Boulevard	PM	0.565	A	0.619	B	0.054	NO	0.733	C	0.787	C	0.054	YES	0.594	A	-0.139	YES
14	Centinela Avenue /	AM	0.905	E	0.906	E	0.001	NO	0.952	E	0.957	E	0.005	NO	0.957	E	0.005	----
	Culver Boulevard	PM	0.928	E	0.933	E	0.005	NO	1.000	E	1.005	F	0.005	NO	1.005	F	0.005	----
15	Centinela Avenue /	AM	0.582	A	0.594	A	0.012	NO	0.642	B	0.654	B	0.012	NO	0.654	B	0.012	----
	Sanford Street - SR-90 WB Off-Ramp	PM	0.506	A	0.508	A	0.002	NO	0.555	A	0.557	A	0.002	NO	0.557	A	0.002	----
16	Centinela Avenue /	AM	0.560	A	0.586	A	0.026	NO	0.676	B	0.702	C	0.026	NO	0.702	C	0.026	----
	SR-90 EB Ramps	PM	0.431	A	0.446	A	0.015	NO	0.555	A	0.561	A	0.006	NO	0.561	A	0.006	----
17	Centinela Avenue - Campus Center Drive /	AM	0.734	C	0.808	D	0.074	YES	0.939	E	1.012	F	0.073	YES	0.803	D	-0.136	YES
	Jefferson Boulevard	PM	0.699	B	0.738	C	0.039	NO	0.941	E	0.979	E	0.038	YES	0.939	E	-0.002	YES
18	Inglewood Boulevard - Centinela Avenue /	AM	0.629	B	0.649	B	0.020	NO	0.761	C	0.781	C	0.020	NO	0.781	C	0.020	----
	Jefferson Boulevard	PM	0.640	B	0.655	B	0.015	NO	0.864	D	0.879	D	0.015	NO	0.879	D	0.015	----
19	I-405 SB Ramps /	AM	0.673	B	0.701	C	0.028	NO	0.772	C	0.798	C	0.026	NO	0.798	C	0.026	----
	Jefferson Boulevard	PM	0.595	A	0.616	B	0.021	NO	0.693	B	0.718	C	0.025	NO	0.718	C	0.025	----
20	I-405 NB Ramps /	AM	1.031	F	1.032	F	0.001	NO	1.108	F	1.109	F	0.001	NO	1.109	F	0.001	----
	Jefferson Boulevard	PM	1.308	F	1.313	F	0.005	NO	1.399	F	1.405	F	0.006	NO	1.405	F	0.006	----
24	Lincoln Boulevard /	AM	0.588	A	0.596	A	0.008	NO	0.723	C	0.732	C	0.009	NO	0.732	C	0.009	----
	Bluff Creek Drive	PM	0.454	A	0.461	A	0.007	NO	0.574	A	0.582	A	0.008	NO	0.582	A	0.008	----
25	Westlawn Avenue /	AM	0.014	A	0.020	A	0.006	NO	0.068	A	0.075	A	0.007	NO	0.075	A	0.007	----
	Bluff Creek Drive	PM	0.020	A	0.025	A	0.005	NO	0.082	A	0.088	A	0.006	NO	0.088	A	0.006	----
26	Centinela Avenue /	AM	0.322	A	0.325	A	0.003	NO	0.358	A	0.361	A	0.003	NO	0.361	A	0.003	----
	Bluff Creek Drive - Major Street	PM	0.381	A	0.394	A	0.013	NO	0.630	B	0.642	B	0.012	NO	0.642	B	0.012	----

[a] According to LADOT's "Traffic Study Policies and Procedures", August 2014, a transportation impact on an intersection shall be deemed significant in accordance with the following table:

Final v/c	LOS	Project Related Increase in v/c
0.701 - 0.800	C	equal to or greater than 0.040
0.801 - 0.900	D	equal to or greater than 0.020
> 0.901	E, F	equal to or greater than 0.010

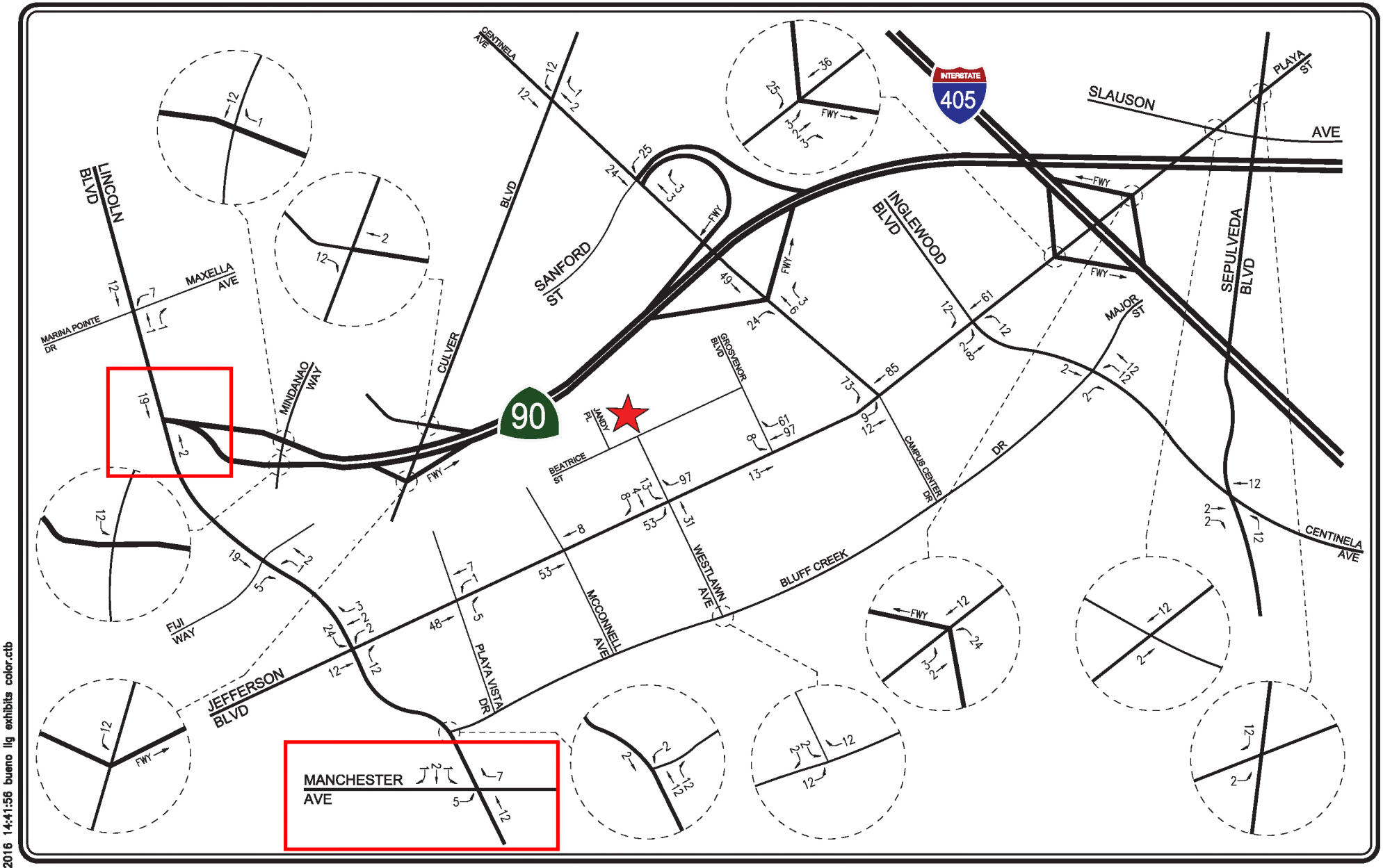
Table 13-1
TRAFFIC SIGNAL WARRANTS SUMMARY [A]

22-Jun-16

NO.	INTERSECTION	EXISTING + PROJECT		FUTURE + PROJECT	
		WARRANT 2 4-HOUR SATISFIED? [B]	WARRANT 3 PEAK HOUR SATISFIED? [B]	WARRANT 2 4-HOUR SATISFIED? [B]	WARRANT 3 PEAK HOUR SATISFIED? [B]
1	Jandy Place / Beatrice Street	NO	NO	NO	YES
2	Westlawn Avenue / Beatrice Street	NO	NO	YES	NO

[A] Traffic signal warrant analysis based on the Manual on Uniform Traffic Control Devices (MUTCD), 2014 California Supplement, November 7, 2014.

[B] Traffic signal warrant data worksheets are contained in *Appendix D*



N

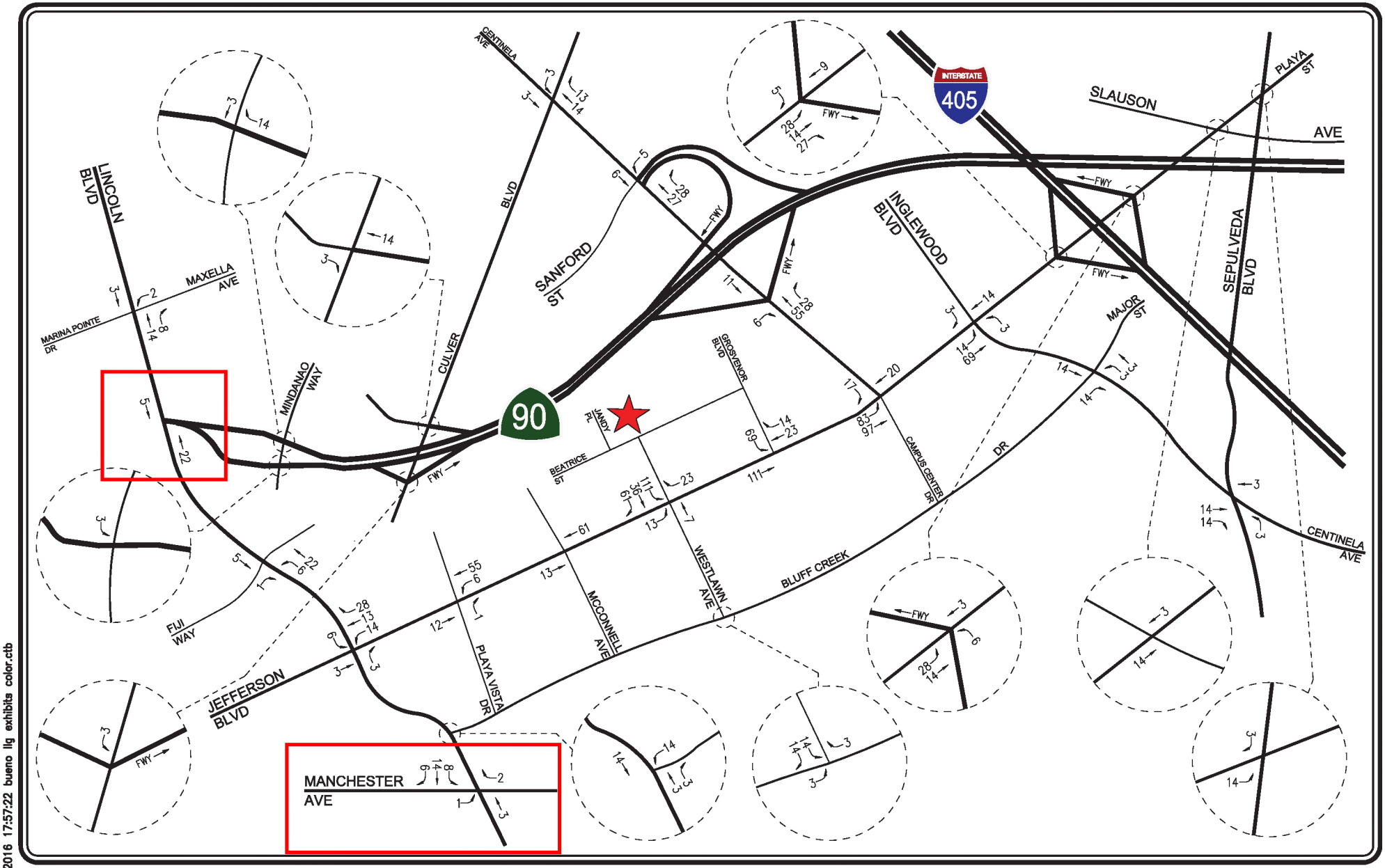
NOT TO SCALE

FIGURE 7-2
PROJECT TRAFFIC VOLUMES

WEEKDAY AM PEAK HOUR

12575 BEATRICE STREET OFFICE PROJECT

LINSCOTT, LAW & GREENSPAN, engineers



PROJECT SITE

NOT TO SCALE

LINSCOTT, LAW & GREENSPAN, engineers

FIGURE 7-3
PROJECT TRAFFIC VOLUMES

WEEKDAY PM PEAK HOUR

12575 BEATRICE STREET OFFICE PROJECT

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Table 15-1
FREEWAY SEGMENT AND OFF-RAMP SCREENING PROCESS
EXISTING CONDITIONS

14-Jun-16

NO.	FREEWAY SEGMENT	DIRECTION	PEAK HOUR	NUMBER OF LANES [A]	CAPACITY [B]	EXISTING VOLUME [C], [D]	V/C RATIO	LEVEL OF SERVICE	ADDED PROJECT TRAFFIC	PERCENT OF CAPACITY	MEETS SCREENING CRITERIA
1	I-405 Mainline north of Jefferson Blvd.	NB	AM	5	10000	10150	1.02	F	3	0.03%	NO
			PM	5	10000	10150	1.02	F	28	0.28%	NO
		SB	AM	5	10000	10150	1.02	F	25	0.25%	NO
			PM	5	10000	10150	1.02	F	5	0.05%	NO
2	I-405 Mainline south of Jefferson Blvd.	NB	AM	5	10000	9793	0.98	E	24	0.24%	NO
			PM	5	10000	9793	0.98	E	6	0.06%	NO
		SB	AM	5	10000	9793	0.98	E	3	0.03%	NO
			PM	5	10000	9793	0.98	E	27	0.27%	NO
3	SR-90 Mainline east of Centinela Ave.	EB	AM	3	6000	3519	0.59	A	3	0.05%	NO
			PM	3	6000	3519	0.59	A	28	0.47%	NO
		WB	AM	4	8000	3519	0.44	A	25	0.32%	NO
			PM	4	8000	3519	0.44	A	5	0.06%	NO
4	SR-90 Mainline btwn. Culver Blvd. & Centinela Ave.	EB	AM	3	6000	2958	0.49	A	24	0.40%	NO
			PM	3	6000	2958	0.49	A	6	0.10%	NO
		WB	AM	3	6000	2958	0.49	A	3	0.05%	NO
			PM	3	6000	2958	0.49	A	28	0.47%	NO
5	SR-90 Mainline btwn. Mindanao Way & Culver Blvd.	EB	AM	2	4000	2397	0.60	A	12	0.30%	NO
			PM	2	4000	2397	0.60	A	3	0.08%	NO
		WB	AM	2	4000	2397	0.60	A	1	0.03%	NO
			PM	2	4000	2397	0.60	A	14	0.35%	NO

Table 15-1 (Continued)
FREEWAY SEGMENT AND OFF-RAMP SCREENING PROCESS
EXISTING CONDITIONS

14-Jun-16

NO.	FREEWAY OFF-RAMP	PEAK HOUR	NUMBER OF LANES	CAPACITY [E]	VOLUME [F]	V/C RATIO	LEVEL OF SERVICE	ADDED PROJECT TRAFFIC	PERCENT OF CAPACITY	MEETS SCREENING CRITERIA
1	I-405 Northbound Off-Ramp	AM	2	1700	815	0.48	A	24	1.42%	NO
	at Jefferson Blvd.	PM	2	1700	950	0.56	A	6	0.35%	NO
2	I-405 Southbound Off-Ramp	AM	3	2550	644	0.25	A	25	0.99%	NO
	at Jefferson Blvd.	PM	3	2550	201	0.08	A	5	0.20%	NO
3	SR-90 Eastbound Off-Ramp	AM	2	1700	317	0.19	A	24	1.42%	NO
	at Centinela Ave.	PM	2	1700	268	0.16	A	6	0.35%	NO
4	SR-90 Westbound Off-Ramp	AM	3	2550	1348	0.53	A	25	0.99%	NO
	at Centinela Ave.	PM	3	2550	800	0.31	A	5	0.20%	NO
5	SR-90 Westbound Off-Ramp	AM	3	2550	709	0.28	A	2	0.08%	NO
	at Culver Blvd.	PM	3	2550	552	0.22	A	14	0.55%	NO

[A] Auxiliary lanes and high-occupancy vehicle lanes are not counted toward the total number of lanes.
[B] Assumed freeway mainline capacity of 2,000 vehicles per hour per lane as stated in the Agreement.
[C] Traffic Volume Data provided in the most recent Caltrans Traffic Volume (2014).
[D] Volumes conducted prior to existing year 2016 were increased using an ambient growth rate of 1.0%.
[E] Assumed freeway off-ramp capacity of 850 vehicles per hour per lane as stated in the Agreement.
[F] Traffic Volume Data provided by traffic counts conducted in 2016.

Attachment D:

Los Angeles Department of Transportation Assessment of Supplemental Traffic Measures for the Proposed Office Project to be Located at 12575 Beatrice Street

CITY OF LOS ANGELES

INTER-DEPARTMENTAL MEMORANDUM

12575 Beatrice Street
DOT Case No. CTC15-103799

DATE: June 6, 2017

TO: Karen Hoo, City Planner
Department of City Planning

FROM: Hamed Sandoghdar, Transportation Engineer
Department of Transportation

SUBJECT: **ASSESSMENT OF SUPPLEMENTAL TRAFFIC MEASURES FOR THE PROPOSED OFFICE PROJECT TO BE LOCATED AT 12575 BEATRICE STREET**

Pursuant to the Coastal Transportation Corridor Specific Plan (CTCSP), Ordinance No. 168,999, the Department of Transportation (DOT) completed the traffic assessment of the proposed Office Project, to be located at 12575 Beatrice Street, and issued a Traffic Impact Assessment (TIA) dated November 21, 2016.

PROJECT DESCRIPTION

The project would construct an office campus consisting of 199,500 square-feet (sf) of floor area. The project site is currently occupied by an office building consisting of 23,072 sf of floor area, which would be removed. Vehicular access to the Project will be provided via Beatrice Street and Jandy Place adjacent to the Project's southerly and westerly frontages, respectively. Full buildout of the project is anticipated to be completed by the year 2018.

DISCUSSION AND RECOMMENDATIONS

In connection with discussions between community members and the applicant, additional traffic measures have been identified that would be considered as project features or voluntary measures. DOT has been asked to review these measures and recommend feasible implementation. DOT therefore recommends the following additional measures:

1. **Jandy Place Driveway Restrictions**: In order to enhance safety for pedestrians on Jandy Place, during the 60 minute lunch time period between 12:30 p.m. and 1:30 p.m. Monday through Friday, the ingress and egress to the project from Jandy Place shall be closed, and the only available ingress and egress shall be via Beatrice Street.

2. **Further Study of Jandy Place Driveway Restrictions**: In connection with the first annual supplemental traffic signal warrant analyses submitted pursuant to Project Requirement C.4 contained in our November 21, 2016 TIA, the project shall also submit an analysis of operations of the Jandy Place driveways to determine if any restrictions should be imposed during the a.m. peak and p.m. peak hours to ensure that project driveway operations do not cause a significant impact to traffic flow on Jandy Place at peak hours. This analysis may also review and recommend changes to the 60 minute lunch time Jandy Place driveway restrictions outlined in Recommendation 1 above. The analysis shall be submitted to DOT for review. If deemed warranted by DOT, the project shall implement additional driveway restrictions and/or make changes to the lunch time driveway restrictions.

3. **Funding for Pedestrian Crossing**: The applicant shall fund and install a yellow flashing signal at the existing striped crosswalk on Inglewood Blvd. at Beatrice Street. If, at the time of project approval, this improvement has been funded by others, then DOT shall require a similar nearby measure of equivalent value designed to enhance pedestrian and student safety in the vicinity of the project.

If you have any questions, please contact me or Pedro Ayala at the DOT West L.A. Planning Office at (213) 485-1062.

HS:SH

cc: Eleventh Council District
Sean Haeri, Mohammad Blorfroshan, DOT
David Weintraub, DCP
Mike Patonai, BOE
Los Angeles County
David Shender, LLG

Attachment D: Responses to Coco Traffic Planners letter from Linscott Law & Greenspan Engineers (Response 11)

MEMORANDUM

To:	Terry A. Hayes Associates Inc.	Date:	December 15, 2017
From:	David S. Shender, P.E. Linscott, Law & Greenspan, Engineers	LLG Ref:	5-15-0218-1
Subject:	**Response to Coco Traffic Planners Comment Memo 12575 Beatrice Street Office Project**		

LINSCOTT LAW & GREENSPAN engineers

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This memorandum has been prepared by Linscott, Law & Greenspan, Engineers (LLG) to provide a response to the comments outlined in the letter[1] submitted by Coco Traffic Planners (the "CTP letter") related to the traffic study prepared for the proposed office project at 12575 Beatrice Street (the "Project"). The CTP letter is attached hereto and the substantive comments therein bracketed for reference in providing responses. LLG prepared the traffic study[2] for the Project (the "LLG traffic study"), as well as a supplemental analysis[3] evaluating the currently proposed Project site plan (the "LLG supplemental traffic analysis"). LADOT reviewed and analyzed the LLG traffic study and LLG supplemental traffic analysis and issued assessment letters[4] validating the analysis.

Response to Comment No. 11-1

The comment asserts that the LLG traffic study and LLG supplemental traffic analysis are deficient because the documents do not state the total supply of parking to be provided on the site. Further, the comments states that the LLG documents should have provided a "parking plan" which we interpret to mean level-by-level plans of the Project's proposed parking structure.

In response, it is noted that the City files related to the Project, such as the Initial Study/Mitigated Negative Declaration (IS/MND), provide information regarding the proposed parking supply, as well as graphics depicting the proposed parking levels for the Project which are readily available for review by the commenter. With respect to the traffic analysis documents, the Project site plans, including the location of the parking structure driveways, are provided in Figure 2-1 within the LLG traffic study and Figure 1 within the LLG supplemental traffic analysis.

---

[1] *12575 Beatrice Street Office Project Traffic Impact Study Review – Los Angeles, California*, Coco Traffic Planners, Inc., October 13, 2017
[2] *12575 Beatrice Street Office Project*, LLG, July 11, 2016
[3] *12575 Beatrice Street Office Project – Project Driveway Traffic Analysis Addendum*, LLG, December 14, 2016
[4] *Traffic Impact Assessment for the Proposed Office Project to be Located at 12575 Beatrice Street*, LADOT, November 21, 2016 & June 6, 2017

The traffic analysis documents do not need to identify the precise quantity of parking provided for the Project; it is assumed that sufficient parking is available on-site and thus, Project-related trips would not need to park at off-site locations. Related specifically to the Project, a supply of parking will be provided that satisfies the Los Angeles Municipal Code, and therefore, all Project-related trips are expected to enter and exit the site driveways. Further, in traffic studies, the number of on-site parking spaces provided is not used to forecast trip generation. Specifically for office buildings, the amount of building floor area is applied to the appropriate trip generation rate (i.e., trips per 1,000 square feet of floor area) to estimate vehicle trip generation.

The forecast of the relative utilization of the site driveways by Project-related vehicles is made not only based on the location of parking within the garage, but also the number of access points and relative ease of ingress and egress to the adjacent streets. An equal number of access points is provided on Beatrice Street and Jandy Place, thus it is assumed that 50% of Project-related traffic will choose each street for access. Further, as demonstrated by the parking layouts available in the City's project application and file, there is free access from each parking level to each ingress and egress vehicle access location. In addition, as the parking is controlled by key cards, the Project has the ability to direct vehicles to enter and exit the garage at specific locations. Thus, the "50/50" assignment of Project traffic to Beatrice Street and Jandy Place as assumed in the LLG supplemental traffic analysis is reasonable and enforceable.

Response to Comment No. 11-2

The comment discusses the proposed relocation of vehicles that currently park in the lot adjacent to the building at 12531 Beatrice Street to the Project parking facility as the existing surface lot will be removed to accommodate construction of the Project. This is disclosed and analyzed in the LLG supplemental traffic analysis; there are no "shortcomings" to the traffic analysis as asserted in the comment. The comment evidences a misunderstanding of the Project which includes retention of an existing office structure and relocation of a portion of its current surface parking into the new parking garage. The LLG supplemental analysis comprehensively evaluates traffic related to the existing parking lot, including traffic counts conducted at the driveway serving the lot to document inbound and outbound traffic volumes. Both the LLG traffic study and LLG supplemental traffic analysis sufficiently evaluate the effects of the Project at the Jandy Place/Beatrice Street and Westlawn Avenue/Beatrice Street intersections. Further, the November 21, 2016 assessment letter issued by LADOT provides their recommended Project-related traffic mitigation at the Jandy Place/Beatrice Street and Westlawn Avenue/Beatrice Street intersections. (IS/MND MM-Transportation/Traffic-1).

The comment states that the Project will create "potentially hazardous" conditions on local streets but does not provide any data, analysis or evidence to support this assertion.

Response to Comment No. 11-3

The comment refers to Table 6-1 in the LLG traffic study which provides the list of related projects and forecast trip generation associated with each development. The table is appropriately footnoted to allow the reviewer to identify the source and/or methodology regarding the trip generation forecast for each project. In some instances (e.g., projects LA1 through LA7), the trip generation data was provided to LLG by LADOT based on City records and files. For the remaining projects (LA8 through LA15, as well as all related projects in Culver City and L.A. County), the trip generation data is calculated by LLG based on project characteristics provided by the relevant jurisdiction, and the table references the land use category from the *Trip Generation* manual published by the Institute of Transportation Engineers (ITE) from which trip rates were utilized to forecast vehicle trips associated with each related project. The commenter can refer to the ITE *Trip Generation* manual to verify the trip forecasts provided in Table 6-1. The LADOT traffic study guidelines[5] do not require traffic studies to list the individual trip rates used in calculating the estimated traffic associated with the related projects. The analysis of related projects as provided in the LLG traffic study was prepared in compliance with the LADOT traffic study preparation requirements.

Response to Comment No.11-4

Similar to Comment No. 11-3, this comment refers to the analysis of related projects as provided in the LLG traffic study. Figures 6-2 and 6-3 in the LLG traffic study provide the forecast traffic volumes at the study intersections due to the related projects for the AM and PM peak hours, respectively. The figures are provided in compliance with the LADOT traffic study guidelines which states on page 16 therein: "The Study must include map(s) showing traffic generated by the related projects only." The traffic distribution was based on standard modeling assumptions and reviewed and approved by LADOT. Additional detail as requested by the comment is typically not provided in traffic studies reviewed and approved by LADOT. In summary, the analysis of related projects as provided in the LLG traffic study is sufficient in regards to the LADOT traffic study preparation requirements, and no additional detail related to the trip assignment of individual related projects is required to be provided within the document.

[5] *Traffic Study Policies and Procedures*, City of Los Angeles Department of Transportation, August 2014.

The comment provides no evidence that there is any error in the modeled distribution of related projects traffic, or that a different distribution would have resulted in any additional Project-related traffic impacts.

Response to Comment No. 11-5

The comment refers to the trip generation forecast for the Project as provided in Table 7-1 in the LLG traffic study. The trip generation forecast for the Project was prepared in accordance to the requirements of the LADOT traffic study guidelines which states on page 12 therein: "The latest edition of the Institute of Transportation Engineer's (ITE) Trip Generation Handbook for trip generation rates and formulas should be used to estimate the Project's trip generation. However, if the Project is in a Transportation Specific Plan (TSP) area, then the procedures and trip rates identified in the TSP should be applied." As shown on Table 7-1, the trip generation forecast was prepared using trip rates from the *Trip Generation* manual for the weekday AM peak hour, as well as over a 24-hour daily basis. For the PM peak hour, as the Project is located within the City's Coastal Corridor Transportation Specific Plan area, the trip forecast was prepared for this time period based on rates provided within the Specific Plan document as required by the LADOT traffic guidelines. Thus, the comment is incorrect in stating that the PM peak hour trip generation forecast for the Project as provided in the LLG traffic study should have relied on data provided in the *Trip Generation* manual in lieu of the Specific Plan.

For many land uses, the *Trip Generation* manual provides "average" trip rates, as well as regression equations for purposes of forecasting vehicle trips. The LADOT traffic study guidelines do not stipulate use of either the average rates or the regression equations in preparing the trip generation forecasts. Therefore, the comment is incorrect that the trip generation forecast provided in the LLG traffic study was prepared in error because it utilized the *Trip Generation* manual's average trip rates.

Finally, the comment asserts that use of the regression equations provided in the *Trip Generation* manual would have resulted in a forecast of greater trip generation for the Project, particularly during the AM peak hour. However, the analysis provided in the CTP comment letter is misleading as it does not consider the vehicle trips related to the existing 23,072 square foot office building to be removed (and the related forecast of trips generated by the existing building using the ITE regression equations).

To illustrate this point, the table below provides the trip forecast as noted on Table 7-1 of the LLG traffic study (using the ITE average trip rates for daily and AM peak hour periods, and the Specific Plan rates for the PM peak hour) as compared to a forecast using the regression equations provided in the ITE *Trip Generation* manual as recommended in the CTP letter.

Methodology	Use	Size	Daily Trips	AM Peak Hour	PM Peak Hour
LLG Traffic Study (Table 7-1)	Proposed Office	199,500 s.f.	2,200	311	399
	Existing Office	(23,072) s.f.	(254)	(36)	(65)
	Net Increase		1,946	275	334
Coco Comment Letter (equation)	Proposed Office	199,500 s.f.	2,219	333	302
	Existing Office	(23,072) s.f.	(431)	(59)	(104)
	Net Increase		1,788	274	198

As noted above, the trip generation forecast provided in the LLG traffic study is more conservative ("worst case") – particularly for the daily and PM peak hour time periods – as compared to the calculation using the regression equations, which is asserted in the comment to be the "correct" methodology. Accordingly, no revisions are required to the trip generation forecast provided in the LLG traffic study.

Response to Comment No. 11-6

The comment refers to the forecast assignment of Project-related trips as provided on Figure 7-1 in the LLG traffic study. The figure complies with the requirements of the LADOT traffic study guidelines which state on page 16 therein: "The TIS must include map(s) showing Project trip distribution percentages (inbound and outbound) at the study intersections, freeway locations and project driveway(s). This map must be pre-approved by LADOT and included in the scoping MOU." Contrary to the assertions in the comment, Figure 7-1 is highly detailed and allows the reviewer to easily track the relative percentage of Project-related vehicles through the study intersections. This is of more value to a reviewer as compared to a more general regional distribution, which is suggested in the comment.

The comment questions the assignment of some Project-related trips within the Playa Vista development located south of Jefferson Boulevard. In response, it is reasonable to foresee that some Project-related trips will have origins and destinations within the Playa Vista area due to: 1) the relatively large amount of high-density residential buildings located within Playa Vista where Project office workers may live; and 2) the availability of commercial uses and services (e.g., health clubs, restaurants, retail/entertainment, etc.) that may attract Project office workers before or after work.

Regarding the comment about the forecast use in the LLG traffic study of Centinela Avenue and SR-90 by a portion of Project-related trips to access Culver Boulevard and Mindanao Way north of SR-90, the comment is incorrect that alternative use of Jefferson Boulevard west of the Project site would definitively result in a shorter trip, whether measured in time or distance. In fact, we estimate that use of Centinela Avenue and SR-90 to Culver Boulevard would result in a shorter travel time and distance as compared to use of Jefferson Boulevard west of the Project site and Lincoln Boulevard. To Mindanao Way, the estimated travel distance from the Project site is approximately the same using either travel route. However, use of Centinela Avenue would result in a shorter drive time as it allows Project trips to avoid travel on over a mile on Jefferson Boulevard west of the Project site, which includes over seven signalized intersections.

Finally, the comment disagrees with the Project trip assignments provided on Figure 7-1 at some off-site intersections but does not offer data, analysis, or evidence in support of an alternative distribution. The procedure for assigning Project-related trips to the study intersections is somewhat subjective in nature, as discussed on page 32 of the LLG traffic study. Thus, there is no precise correct assignment, contrary to the assertion in the comment. Further, the comment does not acknowledge that shifting of Project trips by 5% from one intersection to the next would only nominally change the number of vehicle trips and therefore, not modify the findings provided in the LLG traffic study regarding the relative traffic impacts of the Project nor result in any additional significant impacts.

As an example, Figure 7-1 in the LLG traffic study shows that the Lincoln Boulevard/Jefferson Boulevard intersection is forecast to accommodate approximately 20% of Project-related trips. Column [4] of Table 9-1 in the LLG traffic study indicates that the relative impact due to Project-related traffic at the Lincoln Boulevard/Jefferson Boulevard intersection is well below the thresholds of significance (i.e., 10% of the impact threshold in the AM peak hour and 45% of the impact threshold in the PM peak hour). Thus, the assignment of another 5% of Project-related trips to the Lincoln Boulevard/Jefferson Boulevard intersection would not have triggered the finding of a significant traffic impact at this location. Thus, the comment's assertion that new significant impacts may be triggered by a change in distribution at intersections west of the site is not supported by any data, analysis or evidence.

Response to Comment No. 11-7

The comment refers to the traffic counts conducted at the Westlawn Avenue/Jefferson Boulevard intersection during the weekday AM and PM peak hours. The comment is correct in that the south leg of the intersection was closed due to construction at the time traffic counts were conducted at all of the study intersections. As the south leg of the Westlawn Avenue/Jefferson Boulevard intersection is now open and will be open when the Project is operational, traffic volumes were assigned to the south leg. Further, future baseline volumes associated with the related projects were assigned to the south leg of the Westlawn/Jefferson Boulevard intersection (e.g., as shown on Figures 9-3 and 9-4 in the LLG traffic study for the weekday AM and PM peak hours, respectively). It is noted that the LLG traffic study identified a significant traffic impact at the Westlawn Avenue/Jefferson Boulevard intersection due to the Project. A mitigation measure has been recommended by LADOT to mitigate the traffic impact related to the Project at the Westlawn Avenue/Jefferson Boulevard intersection. (IS/MND MM-Transportation/Traffic-1). With implementation of the measure, the Project-related traffic impacts are mitigated as concluded in the LADOT assessment letter.

Response to Comment No. 11-8

The comment refers to the Level of Service calculations provided in Appendix B of the LLG traffic study for the I-405 SB Ramps/Jefferson Boulevard and I-405 NB Ramps/Jefferson Boulevard study intersections. The lower vehicle lane capacity (1,200 vehicles per hour of green time) as noted in the comment was directed for use by LADOT due to the relatively close spacing between the two intersections. This analysis is more conservative ("worst case") as compared to the vehicle lane capacity of 1,425 vehicles per hour of green time suggested in the comment. Use of the higher vehicle lane capacity suggested in the comment would not result in any additional impacts and would in fact reduce the Project-related impact at these intersections. Therefore, no changes are required to the Level of Service calculations provided in the LLG traffic study for the two intersections.

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October 13, 2017

Ms. Kristina Kropp, Attorney
LUNA & GLUSHON
16255 Ventura Boulevard, Suite 1016
Encino, California 91436

Subject: 12575 BEATRICE STREET OFFICE PROJECT TRAFFIC IMPACT STUDY REVIEW - LOS ANGELES, CALIFORNIA

Dear Ms. Kropp,

As authorized, we have conducted an thorough review of the above mentioned traffic study, prepared on July 11, 2016 by Linscott, Law, and Greenspan Engineers (LL&G) for the office development project located at 12575 Beatrice Street, in Los Angeles, California. In addition, we reviewed an Addendum to the LLG Traffic Study, dated December 14, 2016, addressing a revised driveway and parking plan. The LL&G traffic study was reviewed with regard to the data used, the calculations performed to obtain the study's conclusions, the traffic generation factors used, the traffic distribution and other traffic related matters. This report contains the findings and conclusions of our study with necessary supporting data.

Project Description

The proposed project's site is located at 12575 Beatrice Street, in the City of Los Angeles, bounded by Jandy Place to the west, Beatrice Street to the south, and existing office buildings to its north and east sides. The site falls within the Coastal Transportation Corridor Specific Plan area of the City of Los Angeles.

The site currently is occupied by an office building with 23,072 square feet (sf) of floor area. Two driveways, one on Beatrice Street, and one on Jandy Place respectively provide vehicular access to the existing building. The proposed project consists of the demolition of the existing building, to replace it with a new office building with a net floor area of 199,500 sf.

Vehicular access to the new project will reflect the current layout, with one driveway on Beatrice Street, and two on Jandy Place. A parking garage will be provided on site, beneath the office building. Access to the street and upper levels of the parking garage will be provided by the driveway on Beatrice Street, and the southerly one on Jandy Place. The northerly Jandy Place driveway will provide access only for the subterranean levels of the garage. In addition, a separate driveway will be provided on

Jandy Place at the northern end of the site to be used by service vehicles. Ingress and egress movements will be allowed at all driveways. The Addendum reports that the proposed project has been revised to provide one additional driveway on Beatrice Street, for a total of two, along with the two previously planned for Jandy Place. It should be noted that no data is provided in the subject Traffic Study, nor in the Addendum about the existing, or the proposed parking supply. The project is planned to be built, and fully occupied by the year 2018.

Traffic Study Review And Analysis

Specific tasks, completed as part of this report, consisted of reviewing the LL&G Traffic Study dated July 11, 2016, as well as the Addendum dated December 14, 2016, with regard to the data used, the calculations performed to obtain the study's conclusions, the traffic generation factors used, the traffic distribution, along with the intersection capacity calculation procedures at the key intersections analyzed in the report, and other traffic related matters.

In general, while most of the methodologies used in the analysis are in line with widely accepted industry standards, we found inconsistencies in the evaluation of the traffic generation for the proposed project, and some of the volume/capacity calculations. In addition, some errors were found in the Volume/Capacity ratio calculations relative to some intersections. These inconsistencies allowed the formulation of conclusions that appear to be unreasonable, in view of the results associated with the traffic study. Based upon our review, we offer the following comments on the assumptions, methodologies and conclusions contained in the LL&G traffic study:

- **Project Description** - The LL&G study describes the existing and proposed site development however, there is no mention of the quantity of parking provided, or the allocation of parking stalls among the different parking levels. Similarly, no plan of the parking garage is provided. The Addendum to the Traffic Study does not expand on the proposed parking supply, or the layout of the revised parking facility. No parking plan is provided, or an analysis of the parking supply. Consequently, it is difficult to verify the LL&G assumptions about the site related traffic split between the various driveways. The Addendum reports the additional driveway on Beatrice Street, which should determine a 50/50 split between the Beatrice Street and the Jandy Place driveways, but no data about the parking facility or its supply. The site traffic assignment to the analyzed intersections, especially those adjacent or close to the project's site also is difficult to verify. In addition, since no plan is provided of the parking garage's layout, it is not possible to verify whether the garage has proper internal circulation, or if its design is reasonable. It is recommended that revisions be made to the traffic study, showing the plan of the parking garage, its capacity, and an analysis of the proposed project's parking needs, as compared to the actual parking supply. 1

It should be noted that on page 1 of the Addendum ti is reported that "*In addition, as vehicles currently utilizing the existing surface parking lot to be removed will be relocated to the Project's parking garage, the traffic volumes associated with the existing parking lot were added to the forecast Project-related volumes at the site driveways."* It is not clear why the existing parkers would be added to the future ones, since the proposed office building will replace the existing development. Later in the Addendum, a discussion of the "Relocated Parking" describes that parking for the office building located at 12531 Beatrice Street will utilize the proposed project's parking. This is the first time this condition is described. A revised traffic study should address the subject shortcomings, and expand upon the additional office building's square footage, parking supply, current circulation, and any other information which may help clarify the operations of the new parking structure. It should be noted that the traffic associated with the proposed office building will create a significant number of trips, impacting the intersections of Jandy Place with Beatrice Street (side street Stop controlled), and Westlawn Avenue with Beatrice Street (Stop controlled). These are small two lane streets, and intersections, where the project's traffic will create potentially hazardous conditions, associated with the type of traffic control, visibility, speed limit. The additional traffic associated with the next door building will worsen the hazardous conditions that already will result from the major increase in traffic. 2

- **Related Projects Traffic** - The LL&G study indicates that 29 related projects, listed in Table 6.1 of the study, were under construction, or planned at the time the study was prepared. The table also reports the related projects addresses, land uses, sizes, as well as the traffic generated by each individual projects. However, there is no table showing how the traffic generated by these projects is calculated, i.e. the traffic generation factors used. This makes it very difficult to verify the accuracy of the calculations. This is significant, since the overall related projects' traffic generation is reported at about 9,200 and 11,300 vehicle trips during the AM and the PM peak hours respectively. A revised traffic study should address the subject shortcoming. 3

- **Related Projects Traffic Distribution and Assignment** - Once a project's regional traffic distribution has been evaluated, the traffic is assigned to the key intersections. Exhibits showing the traffic assignment, possibly by land use, make it possible for the reader to understand the pathways assumed by the traffic engineer. No data is provided by the LL&G report with regard to the related projects traffic distribution. Also, there is no mention of how their traffic has been assigned to the street system, and to the intersections analyzed. The study only provides exhibits showing the related projects' combined traffic volumes at the key intersections, both for AM and PM peak hour traffic conditions, which doesn't help much deciphering the routes used 4

by the related projects' patrons. Hence, it is impossible to verify the accuracy of the calculations, and ultimately of the report. A revised project's traffic report should provide a detailed related projects' traffic generation table, and exhibits showing the traffic assignment in terms of percentages of the traffic generated by the related projects.

- **Project Traffic Generation** - Table 7.1 of the LL&G study shows the proposed project's traffic generation. The calculations are based upon data provided by the Traffic Generation Manual of the Institute of Transportation Engineers (ITE) for the daily, and the morning peak hour factors, as well as by the Coastal Transportation Corridor Specific Plan for the evening peak hour. The table indicates that, the proposed project is expected to generate about 311 vehicle trips (274 inbound and 37 outbound) during the morning peak hour. The evening peak hour shows an estimated generation of 399 vehicle trips (68 inbound and 331 outbound). It should be noted that the ITE data is based upon thousands of traffic generation surveys. The analysis of those surveys establishes the relationship between the traffic generated by various land uses, and an "independent variable", normally the square footage of a development. The results of the subject analyses provide formulas, correlating the traffic generated, to the square footage of a given land use. When sufficient data is not available, the Manual only provides an average traffic generation rate. When both equations and rates are provided the formulas should be utilized since they are more accurate, and directly take into account the specific size of the land use. Basically, on a per unit basis (i.e. 1,000 sf), the traffic generated by a development varies with its total size. For instance, based upon the ITE equation (9th Edition), a 50 ksf office building is expected to generate 775 vehicle trips per day, which translates into a factor of about 15.5 trips per 1,000 sf. The same equation yields 1,313 daily vehicle trips for a 100 ksf, or a factor of about 13.13 trips per 1,000 sf. 5

  Besides the subject equations, the ITE also provides the average size of the independent variable. The weekday condition for General Office space, shows that the average size of the developments surveyed was 197 ksf. By "plugging" the average size among all of the sample surveys into the equation, a value of about 11.16 vehicle trips per 1,000 sf is obtained. This is very close to the Average Rate reported in the manual (11.03), and is the rate used by the LL&G traffic study. By using the average factor Linscott Law & Greenspan assumes that the proposed, and the existing office space generate traffic at the same rate as the average 197 ksf development, thus nullifying the effort of generating the equations in the first place. While the proposed project size is very close to the average size mentioned above, the existing building is much smaller (23,072 sf) therefore the average traffic generation factor is not appropriate. As stated above, the correct methodology is to use the equations, whenever available. It should be noted

that by using average rates, the proposed project shows a lower traffic generation than it would, if the correct procedure were employed.

The above argument also stands for the AM and the PM peak hours conditions. Table 1 shows a comparison between the two methodologies. Specifically, the proposed project, which the LL&G study calculated to generate about 311 vehicle trips (274 inbound and 37 outbound) during the morning peak hour, would actually generate about 330 vehicle trips (290 inbound and 40 outbound) during the morning peak hour, a higher volume. The evening peak hour shows an estimated generation of 399 vehicle trips (68 inbound and 331 outbound), calculated with the Coastal Transportation Corridor Specific Plan (CTCSP) peak hour factors. This volume instead would change to a lower 302 vehicle trips (51 inbound and 251 outbound), with ITE factors. Given that the ITE data is significantly more accurate than the "one factor fits all" CTCSP factors, it is recommended that a revised project's traffic report also applies the ITE equations to the proposed, as well as the existing project. The following example should be noted with regard to using the CTCSP factors: an 80 ksf office would generate about 224 trips during the PM peak hour (80 x 2.8), while a 110 ksf would generate 220 trips (110 x 2.0). Basically, these two buildings would generate the same quantity of traffic, in spite of the fact that one is about 40% larger than the other.

- **Project Traffic Distribution** - Figure 7.1 of the LL&G study is reported as showing the proposed project's traffic distribution. In reality the Figure shows the project's traffic assignment to the key intersections. No Figures showing estimates of the regional/directional, distribution of the site traffic are presented. Once the directional distribution of the site traffic is estimated, then the traffic can be assigned to the roadway system, and the key intersections, as Figure 7.1 of the LL&G study. Without the regional distribution Figure, it is very difficult to ascertain the correctness of the traffic distribution, and consequently, the accuracy of the traffic assignment. It appears that site traffic going to, and coming from the west was estimated at between 10 and 15 percent of the total traffic generated. This appears to be exaggerated, given the short distance between the site and the ocean, and the limited quantity of residential developments to the west of the site. 6

  About 13 percent of the inbound and outbound site traffic has been assigned to Westlawn Avenue. Of that, 3 percent is assumed to stop at the residential development right south of Jefferson Boulevard. Both these assignments appear to be significantly high, along with the 10 percent of the site traffic assignment to Bluff Creek Drive.

  Also, 10 percent of the site traffic has been assigned to the westbound on-ramp to the Hwy 90, off of Centinela Avenue, with the assumption that this traffic will go to Culver Boulevard (5%), and Mindanao Way (5%). Basically,

TABLE 1

PROJECT TRAFFIC GENERATION
12575 Beatrice Street Office Project Traffic Impact Study Review - Los Angeles

LAND USE	SIZE	UNIT	LAND USE CODE	AVERAGE DAILY TRAFFIC (1) TE Rate	AVERAGE DAILY TRAFFIC (2) Trip Ends	AM PEAK HOUR TE Rate (1) In	AM PEAK HOUR TE Rate (1) Out	AM PEAK HOUR Trip Ends (2) In	AM PEAK HOUR Trip Ends (2) Out	PM PEAK HOUR TE Rate (1) Out	PM PEAK HOUR Trip Ends (2) In	PM PEAK HOUR Trip Ends (2) Out
Site Project Per LL&G Study												
Proposed General Office	**199.500**	**KGSF**	710	11.03	2,200	1.373	0.187	274	37	0.340	1.660	68	331
Proposed Project Traffic Generation					**2,200**	**AM Peak = 311**		**274**	**37**	**PM Peak = 399**		**68**	**331**
Proposed Development Net Traffic Generation					**2,200**	*AM Total = 311*		**274**	**37**	*PM Total = 399*		**68**	**331**
Site Project Per ITE Data												
Proposed General Office	**199.500**	**KGSF**	710	11.12	2,219	1.467	0.200	293	40	0.26	1.26	51	251
Proposed Project Traffic Generation					**2,219**	**AM Peak = 333**		**293**	**40**	**PM Peak = 302**		**51**	**251**
Proposed Development Net Traffic Generation					**2,219**	*AM Total = 333*		**293**	**40**	*PM Total = 302*		**51**	**251**

Note: Traffic Generation factors per Institute of Transportation Engineers (ITE) Traffic Generation Manual 9th Edition.

1) TE Rate is the average number of Trip Ends generated per "SIZE" Unit (i.e. DU).

2) Trip End is a one-way vehicle movement entering or leaving the traffic generator.

this traffic is supposed to turn left on Jefferson Boulevard, travel east and turn left (northbound) on Centinela Avenue, onto the 90 Hwy, to exit on Culver Boulevard, and Mindanao Way. Should this traffic turn right onto Jefferson Boulevard (westbound), it would get to the same point on a 20% shorter route. Had the correct assignment have been used, the project's traffic impacts would have further deteriorated in the intersections located west of the site, and possibly trigger significant impacts. These inconsistencies should be cleared and/or corrected in the recommended proposed project's revised traffic study.

- The existing northbound traffic movements at the intersection of Westlawn Avenue and Jefferson Boulevard are not shown, both for the AM and the PM peak hours Figures 5-1, and 5-2, indicating that no northbound movements are allowed, or exist. The data, obtained from the traffic counts conducted on January 28, 2016, and provided by the City of Los Angeles Department of Transportation (LADOT), do not show any northbound volumes at the subject location. However, those movements are allowed, and exist. It appears that on the date of the count, January 28, 2016, that leg of the intersection was blocked to northbound traffic, possibly for construction south of Jefferson Boulevard. Consequently, additional traffic counts should have been conducted when the subject northbound leg was reopened. This is the first intersection that the site traffic impacts right out of the project site. Consequently, it is critical that this inconsistency be cleared and/or corrected in the recommended proposed project's revised traffic study. 7

- The intersections of Jefferson Boulevard with both north and southbound ramps to the I-405 has been calculated with a capacity of 1,200 vehicles per hour (vph) due to the fact that the intersections are closely spaced. However, the subject traffic signals are connected, and traffic movements are coordinated. Consequently, the correct capacity of 1,425 vph for three phase signals should be used. 8

* * * * * *

Summary And Conclusions

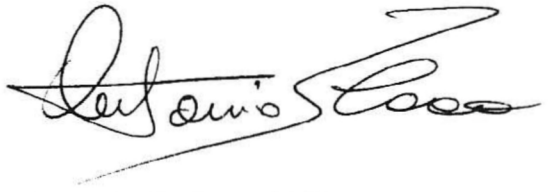
A thorough and independent review of the traffic study prepared by Linscott, Law & Greenspan, Engineers for an office development project located at 12575 Beatrice Street, in Los Angeles, California was conducted by our firm. The review verified the accuracy and consistency of the data used, the calculations performed to obtain the volume/capacity ratios presented, and the adequacy of the study's conclusions. In addition, the traffic generation factors used in the traffic study were verified. A detailed review of the technical appendices to the traffic study also was conducted.

Our review of the subject traffic study showed that while the methodologies used are in line with widely accepted industry standards, the traffic study does not provide some of the data required by the latest LADOT Traffic Study Policies and Procedures. Specifically, the lack of the Regional Traffic Distribution, both in a Figure format, and in a text format makes it difficult, if not impossible to verify the traffic assignment used in the study, which is a critical element of the analysis. We also found inconsistencies in the evaluation of the traffic generation of the proposed project, and the volume/capacity calculations which altered the real proposed project's traffic impacts. We estimate that a greater number of intersections may be significantly impacted by the subject development, as compared to those found by the LLG study. It is recommended that the subject LLG traffic study be revised to correct the inconsistencies found by our review.

Please call me if you have any questions with regard to our review.

Respectfully submitted,

COCO TRAFFIC PLANNERS, INC.



Dr. Antonio S. Coco, P.E.
President

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