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Via E-mail (clerk.plumcommittee@lacity.org)

February 4, 2020

Planning and Land Use Management Committee
Los Angeles City Council
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90071

Re: Council File 19-1077; Appeal of ENV-2018-3289-CE-1A filed by Frontier Holdings West, LLC & Main Fund Associates, LLC (collectively, "Frontier West"); Hearing Continued from January 14, 2020

Honorable Members of the Planning and Land Use Management Committee:

During its presentation at the January 14th PLUM Committee proceedings on this matter, Staff represented to the Committee that LADOT had "signed off" on circulation issues pertaining to the alley, and that the analysis of Crain & Associates – a recognized expert transportation planning and traffic engineering consulting firm – was not supported by substantial evidence.

The attached February 4, 2020 letter from Crain & Associates clearly establishes that LADOT has not "signed off" on the Project's alley dedication and widening issues and, in fact, that LADOT directed the applicant to the Bureau of Engineering, which as the Committee is aware, requested a dedication and stated in its Case Referral Form dated June 28, 2018 that "ALLEY TO BE WIDENED TO A MINIMUM 20 FT. WIDE."

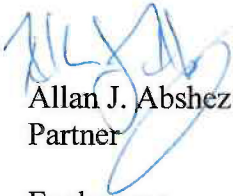
In addition, Crain's February 4th letter outlines the geometric design principles underlying Crain's analysis that failure to dedicate and widen the alley will "*foreseeably result in traffic blockages and/or gridlock conditions as well as public safety hazards. Gridlock is likely to occur when automobiles traveling in opposite directions need to pass one another on the 6-foot wide half alley. Any added Project parking and loading access to the alley will increase the potential for such conflicts, and stacked vehicles may not be able to back up.*"

Finally, Crain's February 4th letter underscores the need to dedicate and widen alleys to the Bureau of Engineering's Standard Plan for Standard Street Dimensions (S-470-1) in light of the City's current policies, including those contained in the City's *Downtown Design Guidelines*, which require parking, service and loading to be from the alley "wherever feasible."



For all of these reasons – and to avoid unnecessary litigation that will compel the City to comply with its CEQA responsibilities – the City Council should set aside the Categorical Exemption and, at a minimum, condition the Project to require that it provide a 4-foot wide alley dedication as required by the City’s Mobility Element, Municipal Code, Standard Street Dimensions, and the Bureau of Engineering’s request.

Sincerely,



Allan J. Abshez
Partner

Enclosures

cc: Council Member Jose Huizar
Daniel Taban
Alexander Irvine
Lisa Webber
Fernando Tovar



EMAIL TRANSMITTED

February 4, 2020

Planning and Land Use Management Committee of
The Council of the City of Los Angeles
c/o City Clerk, Room 395
City Hall, 200 North Spring Street
Los Angeles, CA 90012-4801

RE: Hyatt Centric Project (the "Project"); Case No. ZA-2018-3288-CUB-SPR-1A, ENV 2018-3289-CE (Council File 19-1077)

Honorable Members of the PLUM Committee,

Crain & Associates is an expert transportation planning and traffic engineering consulting firm. Our letter of October 22, 2019 addressed the Project's lack of conformance with the City's General Plan (Mobility Plan 2035) and the requirements of the Municipal Code, and explained that development and operation of the Project without improvement and dedication of the alley to its required width of 20 feet (10-foot wide half alley) would "foreseeably result in traffic blockages and/or gridlock conditions, as well as potential public safety hazards." This letter provides further evidence underlying such analysis.

Per the American Association of State Highway and Transportation Officials (AASHTO) *A Policy on Geometric Design of Highways and Streets* (7th Edition, 2018), design vehicle widths for passenger cars and single-unit trucks are 7 feet and 8 feet, respectively. Therefore, standard

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design vehicles, whether passenger cars or delivery trucks, cannot pass each other when traveling on a 12-foot wide alley.

In addition, as outlined in *A Policy on Geometric Design of Highways and Streets* (which is hereby incorporated by reference), the minimum outside radius required for a standard passenger car and single-unit truck (30-foot long) to complete a turn are 25.4 feet and 43.3 feet, respectively. Therefore, when either of these standard design vehicles makes turns to or from a 12-foot wide alley, much of the vehicle's swept path could not be accommodated within the dimensions of the alley. The turning movement of even a single vehicle could not be completed on a 12-foot wide alley, which would block the alley, result in conflicts with other vehicles using the alley, and increase the potential for collisions.

Accordingly, due to the inability of standard design vehicles to pass and maneuver on a 12-foot wide alley such as the alley adjacent to the Project, any increase in traffic volumes due to the Project without an increase in alley width to City standards will result in a significant transportation impact per the current City of Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines* (July 2019).

In addition, contrary to the claims of Department of City Planning staff at the January 14, 2020 hearing, LADOT did not approve of the design of the Project's driveways in relation to adjacent roadways/alleys. In fact, the Project Requirements section of the May 23, 2018 traffic analysis review memorandum, prepared by Wes Pringle of LADOT for the Project, states that the "applicant should check with Bureau of Engineering's Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project." The Bureau of Engineering (BOE) Planning Case Referral Form, dated June 28, 2018, requires both dedication and widening, including as a required improvement that the "ALLEY TO BE WIDENED TO A MINIMUM 20 FT WIDE."

The Driveway Design section of the LADOT *Manual of Policies and Procedures* provides the fundamental standards for the review of driveway designs within the City, with a goal to "minimize adverse effects on street traffic." In terms of driveway location planning, the basic rule is to minimize potential conflicts between users of the parking facility and users of the abutting street system by reducing the number of driveways and placing them on the lowest-available classification roadway. As such, the manual states that driveways "should not be permitted along arterial highways where the proposed development is:

1. Residential, and access is possible using an alley or non-arterial street, or
2. Industrial or commercial, and
 - a. At the intersection of the arterial highway and a non-arterial street, and
 - b. Access is possible along the non-arterial frontage.”

The City's *Downtown Design Guide* embodies this policy, stating in Section 5 (Parking and Access) on page 24, “[v]ehicular entries shall be from an alley or mid-block on an east-west street where feasible,” and “[a]ccess to parking/service/loading shall be from the alley, and shared wherever feasible.” The end result of this driveway location policy, especially in high-density residential development areas such as Downtown Los Angeles, is that primary access/egress for many future development projects will be taken from site-adjacent alleys (when present).

As a case in point, the Main Street Tower project planned at 1123 S. Main Street, which will include up to 363 multifamily residential dwelling units and ground-floor commercial space, proposes its primary residential and commercial access/egress from the east side of the alley abutting the Project. The Main Street Tower project will fulfill its obligation of dedicating and widening the alley along its frontage (to the required 10-foot wide half alley). This underscores the need for all future development projects to comply with the requirements of the Mobility Plan 2035 and the Municipal Code requirement to widen the alley to 20 feet and dedicate it to public use for alley purposes. This is necessary in order to ensure that the cumulative buildout width of the alley is a minimum of 20 feet, as required by the BOE Standard Plan for Standard Street Dimensions (S-470-1). At a minimum width of 20 feet, the alley will meet cumulative infill development access needs, especially for truck deliveries.

Sincerely,



Ryan J. Kelly, T.E.
Senior Transportation Engineer
TR 2547

c.c. Daniel Taban
Fernando Tovar

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C22649