



EMAIL TRANSMITTED

October 22, 2019

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; Case No. ZA-2018-3288-CUB-SPR-1A, ENV 2018-3289-CE
(Council File 19-1077)

Dear Planning and Land Use Management Committee members,

Crain & Associates is a professional traffic engineering and transportation planning consulting firm with extensive expertise and experience regarding City of Los Angeles traffic and transportation matters. We have reviewed the proposed plans for the Hyatt Centric Project (the "Project") and the Office of Zoning Administration's decision dated May 23, 2019. As discussed in detail below, based upon our review, the Project is not in substantial conformance with the City's Municipal Code and General Plan and thereby does not meet the requirements for a Class 32 Exemption under the California Environmental Quality Act (CEQA). Further, as discussed in detail below, the Project as approved would foreseeably generate significant transportation impacts.

The Project would be located on the east side of Broadway, between 11th Street and 12th Street, in the City's South Park neighborhood. The Project would consist of the construction of a new 15-story hotel with 139 guest rooms. The existing on-site use (Michael Vincent Academy beauty school) would be removed in conjunction with development of the Project. Project

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parking would include 42 vehicle parking spaces and 16 bicycle parking spaces. All Project vehicular access/egress and goods loading would be via the alley that forms the eastern boundary of the site.

All Project vehicular access/egress to the garage (using car elevators) and goods loading would be via the alley that forms the eastern boundary of the site. The Project site's vehicular access being solely from the alley will cause considerable burden to the alley – especially when combined with other traffic and property owners using the alley for access and service to the other properties on the block. However, the alley currently maintains a substandard width of 12 feet (6-foot wide half-alley), between 11th Street and 12th Street. Despite the recommendation of the Bureau of Engineering (attached), no alley dedication has "been required to provide for its widening to a standard alley width of 20 feet (10-foot wide half-alley). The 20-foot widths are recommended by the Bureau of Engineering in order to allow automobiles and truck to pass vehicles traveling in the opposite direction along the alley. The 12-foot widths are not sufficient to allow such passing.

The Bureau of Engineering recommendation is for consistency with Section 17.05.E of the City of Los Angeles Municipal Code (LAMC), which requires that alleys "shall not be less than 20 feet in width." Further, the Transportation Element of the City's General Plan, more commonly referred to as Mobility Plan 2035, references the standard roadway dimensions for all roadway classifications in the City outlined in the Bureau of Engineering's Standard Plan for Standard Street Dimensions (S-470-1). Per Standard Plan S-470-1, alleys shall be a minimum of 20 feet in width. Additionally, Mobility Plan 2035 Program PL.1 (Driveway Access) requires that driveway access to buildings be provided from non-arterials or alleys where feasible. A 12-foot wide alley would limit passenger vehicle access and not allow truck access, which PL.1 is designed to achieve. Therefore, in order to be in substantial conformance with the LAMC and the requirements of the City's General Plan, the Project's four-foot wide dedication along the alley is required. This would allow for the minimum half-alley width of 10 feet adjacent to the Project site. Without the required four-foot dedication along the alley, the Project would be inconsistent with the LAMC, preclude the City from implementing the goals of Mobility Plan 2035, and consequently the finding of substantial conformance with the General Plan required by LAMC Section 16.05.F.1 cannot be made.

Because the Project, as approved, is not in substantial conformance with the LAMC and General Plan, it does not qualify for a Class 32 "Infill" Categorical Exemption. Section 15331 of the CEQA Guidelines prohibits the use of a Class 32 Exemption unless "the project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations."

Further, the Project, as approved, will foreseeably result in significant transportation impacts. Per the current City of Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines* (July 2019), the CEQA analysis of transportation impacts includes determining if a development project:

- 1) conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities; and
- 2) substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project conflicts with Mobility Plan 2035 and, therefore, may have a significant transportation impact based on the first item above. Moreover, the lack of an alley dedication and retention of a substandard half-alley width adjacent to the Project, coupled with the Project's plan for vehicular access/egress and goods loading from the alley and combined with other non-Project traffic utilizing the alley, will foreseeably result in traffic blockages and/or gridlock conditions, as well as potential 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.

In the event the alley dedication required by the LAMC and Mobility Plan 2035 is not required for the Project, an environmental analysis should be performed to evaluate and mitigate potential impacts related to inbound/outbound Project turning maneuvers at the garage entry/exit for the largest design vehicle anticipated to use the Project, inbound/outbound turning maneuvers at the loading dock entry/exit for the largest truck expected to service the Project site, and cumulative traffic anticipated to utilize the alley.

Please contact me if you have any questions.

Sincerely,



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