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January 10, 2017

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

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

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

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

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

Project Address:
333 S. La Cienega Boulevard

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

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

Following are my detailed review comments:

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

Appendix A

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

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

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

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

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

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

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

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

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

Very truly yours,


Allyn D. Rifkin, PE

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

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

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

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

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

Attachment 6 – Project Location Map

ATTACHMENT 1

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

Mr. Rifkin has over 30 years of experience in the field of transportation engineering and planning. Included in that experience are assignments in both the private and public sectors, ranging from consultant for developers to research for the Automobile Club of Southern California. Until recently, he was the Chief of the Los Angeles Department of Transportation's Bureau of Planning and Land Use Development, responsible for managing a staff of 38 professionals and serving as the key department liaison between the development community and City Council on traffic mitigation and transportation planning issues. He supervised the completion of numerous project EIRs for the City of Los Angeles. His latest projects focused on transit oriented development along various rail alignments in the Los Angeles area. As a private consultant, Mr. Rifkin has worked closely with residential neighborhood associations and developers to negotiate consensus on traffic mitigation measures in association with proposed development projects. Other consultant efforts of interest include assistance to the Eagle Rock neighborhood in the formation of the Colorado Boulevard Pilot Community Parking program and to County Supervisor Yaroslavsky in the initial proposal to convert Olympic and Pico Boulevards into a one-way pair.

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

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

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

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

LA DOT **SHOULD BE #3 FOR OPPOSED PHASING**
Moving LA Forward



US #	North-South Street	East-West Street	La Cienega Boulevard 2nd Street	Year of Count	2015 Projection Year	Ambient Growth (%)	Peak Hour	Conducted by	Eric-Ji	Date	3/1/2015 Project: 333 S La Cienega	
											Year of Count	2017 Projection Year
18	North-South Street	East-West Street	La Cienega Boulevard 2nd Street	2015	2017	0%	PM	Eric-Ji	3/1/2015	3/1/2015	333 S La Cienega	
<p>Special Phasing: NB-L, EB-W or RB-R</p> <p>Right Turns FREE-1, LEFTORS or OLA-37</p> <p>ATSAC-1 or ATSAC+ATCS-2?</p>												
<p>SHOULD BE #3 FOR OPPOSED PHASING</p>												
MOVEMENT	EXISTING CONDITION			EASTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT			FUTURE CONDITION W/ PROJECT		
	No. of Lanes	Volume	Capacity	Project Traffic	Total Volume	No. of Lanes	Added Volume	Total Volume	No. of Lanes	Added Volume	Total Volume	No. of Lanes
NORTHBOUND	2	432	432	432	1090	2	495	1277	2	495	1277	2
SOUTHBOUND	2	205	205	205	205	2	205	205	2	205	205	2
EASTBOUND	2	146	146	146	146	2	146	146	2	146	146	2
WESTBOUND	2	178	178	178	178	2	178	178	2	178	178	2
<p>CRITICAL VOLUMES</p> <p>North-South: 512 East-West: 571</p> <p>North-South: 512 East-West: 571</p>												
<p>VOLUME CAPACITY (V/C) RATIO:</p> <p>0.780</p>												
<p>LEVEL OF SERVICE (LOS):</p> <p>C</p>												

Change in v/c due to project: **0.006** w/ other mitigation: **0.006**
Significant impacted? **NO** Fully mitigated? **NO**

PROJECT IMPACT
Change in v/c due to project: **0.006** w/ other mitigation: **0.006**
Significant impacted? **NO** Fully mitigated? **NO**

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



SHOULD BE #3 FOR OPPOSED Level of Service Worksheet
333 S La Cienega - PM Peak Hour



US #:	North-South Street:	East-West Street:	La Cienega Boulevard	3rd Street	Year of Count:		Ambient Growth: (%)		Conducted by:	Eric Ji	Date:	10/5/2015	Project:	333 S La Cienega	
					2015	2017	Peak Hour:	PM							
16	North-South Street:	East-West Street:	La Cienega Boulevard	3rd Street	5	4	4	4	Reviewed by:	Eric Ji	4	4	4	4	
	Disposed @ Ing. NS-1, EW-2 or Both-3?				0	0	0	0			0	0	0	0	
	Right Term: PRECIS, NETWORK or ULA-3?				0	0	0	0			0	0	0	0	
	ATSAC-1 or ATSAC-ATCS-2?				0	0	0	0			0	0	0	0	
	ATSAC-1 or ATSAC-ATCS-2?				1	1	2	2			0	0	0	0	
	Override Capacity				0	0	0	0			0	0	0	0	
MOVEMENT		EXISTING CONDITION		EXISTING PLUS PROJECT		FUTURE CONDITION W/O PROJECT		FUTURE CONDITION W/ PROJECT		FUTURE W/ PROJECT W/ MITIGATION		Total		Lane	
		Volume	No. of Lanes	Project Traffic	Total Volume	Lane Volume	Total Volume	Lane Volume	Added Volume	Total Volume	Lane Volume	Added Volume	Total Volume	Lane Volume	No. of Lanes
NORTHBOUND	Left-Through	104	2	104	104	57	106	2	58	106	2	58	106	2	58
	Through-Right	1080	2	1080	1080	432	1277	2	495	1277	2	495	1277	2	495
	Right	205	0	205	205	205	208	0	208	208	0	208	208	0	208
	Left-Through-Right		0			0		0			0			0	
	Left-Right		0			0		0			0			0	
SOUTHBOUND	Left-Through	146	2	146	146	80	153	2	84	153	2	84	153	2	84
	Through-Right	657	2	657	657	365	1112	2	412	1121	2	417	1121	2	417
	Right	122	0	122	122	128	125	0	125	131	0	131	131	0	131
	Left-Through-Right		0			0		0			0			0	
	Left-Right		0			0		0			0			0	
EASTBOUND	Left-Through	159	1	159	159	166	168	1	168	175	1	175	175	1	175
	Through-Right	761	2	761	769	385	789	2	395	797	2	399	797	2	399
	Right	78	1	78	78	101	80	1	51	131	1	102	131	1	102
	Left-Through-Right		0			0		0			0			0	
	Left-Right		0			0		0			0			0	
WESTBOUND	Left-Through	179	1	179	183	183	182	1	182	186	1	186	186	1	186
	Through-Right	558	1	558	561	350	580	1	362	586	1	365	586	1	365
	Right	135	0	135	135	135	143	0	143	143	0	143	143	0	143
	Left-Through-Right		0			0		0			0			0	
	Left-Right		0			0		0			0			0	
CRITICAL VOLUMES		North-South: 512	East-West: 560	North-South: 512	East-West: 577	North-South: 579	East-West: 585	North-South: 579	East-West: 577	North-South: 579	East-West: 585	North-South: 579	East-West: 585	North-South: 579	East-West: 585
SUM:		1072	1080	1080	1156	1156	1184	1184	1184	1184	1184	1184	1184	1184	1184
VOLUME/CAPACITY (V/C) RATIO:		0.780	0.785	0.841	0.841	0.841	0.841	0.841	0.841	0.841	0.841	0.841	0.841	0.841	0.841
V/C LESS ATSAC/ATCS ADJUSTMENT:		0.710	0.715	0.741	0.741	0.741	0.741	0.741	0.741	0.741	0.741	0.741	0.741	0.741	0.741
LEVEL OF SERVICE (LOS):		C	C	C	C	C	C	C	C	C	C	C	C	C	C

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

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

PM Peak Hour -10:5-15 Project Trips Take off Existing TC

10/6/2015 7:37 AM



Level of Service Worksheet
(Circular 212 Method)



US #	North-South Street	La Cienega Blvd	East-West Street	3rd Street	Year of Count	2015	Ambient Growth (%)	1	Peak Hour	PM	RTTPG				Date	1/10/2017								
											Conducted by: ALL VNF KIN PE Reviewed by: Project: 333 S. La Cienega Blvd													
Opposed Opp: NB-1, E/W-2 or B-37					4				3				4											
Right Turns: FREE-1, RTOR-2 or DL-37					0				0				0											
ATSAC-1 or ATSAC-ATCS-27					0				0				0											
Overhead Capacity					1				2				2											
MOVEMENT					EXISTING CONDITION				EXISTING PLUS PROJECT				FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT MITIGATION			
					Volume	No. of Lanes	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume		
NORTHBOUND	Left	104	2	57	0	104	57	0	104	2	58	0	106	2	58	0	106	2	58	0	106	2	58	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through-Right	1080	2	432	0	1080	432	165	1277	2	495	0	1277	2	495	0	1277	2	495	0	1277	2	495	
	Right	205	1	205	0	205	205	-1	208	1	208	0	208	1	208	0	208	1	208	0	208	1	208	
SOUTHBOUND	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Right	148	2	60	0	148	60	4	153	2	64	0	153	2	64	0	153	2	64	0	153	2	64	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Through-Right	957	2	360	16	973	368	136	1112	2	412	16	1128	2	421	16	1128	2	421	16	1128	2	421	
EASTBOUND	Right	122	0	122	11	133	132	1	125	0	125	1	136	0	136	0	136	0	136	0	136	0	136	
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Right	158	1	159	12	171	171	6	168	1	168	12	180	1	180	12	180	1	180	12	180	1	180	
	Left-Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
WESTBOUND	Through-Right	781	2	381	14	775	388	13	789	2	395	14	803	2	402	14	803	2	402	14	803	2	402	
	Right	78	1	50	89	167	139	0	60	1	51	89	169	1	140	89	169	1	140	89	169	1	140	
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Right	179	1	179	7	186	186	-1	182	1	182	7	189	1	189	7	189	1	189	7	189	1	189	
CRITICAL VOLUMES	Left-Through	556	1	347	11	569	352	11	590	1	362	11	591	1	367	11	591	1	367	11	591	1	367	
	Through-Right	135	0	135	0	135	135	5	143	0	143	5	143	0	143	5	143	0	143	5	143	0	143	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Left-Through-Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
SUM:					1105	732	3100	800	307	807	1210	916	1225	916	1225	916	1225	916	1225	916	1225	916	1225	
SUM:					1035	728	3056	740	807	757	1110	769	1110	769	1110	769	1110	769	1110	769	1110	769	1110	
SUM:					1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	
VOLUME CAPACITY (V/C) RATIO:					1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	1.005	
LEVEL OF SERVICE (LOS):					F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	

Version: 11 Beta; 8/4/2011

1/5/2017 9:43 PM

3RD LA CIENEGA - CORRECTED PHASING and Wrong Phasing

PROJECT IMPACT
 Change in v/c due to project: 0.015
 %v/c after mitigation: 0.015
 Fully mitigated? YES
 Significant impacted? YES
 Fully mitigated? NO

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

rtpg 1-4-17

Trip Generation Analysis

333 S. LA CIENEGA
Revised Project
Modified Super Market

SOURCE: ITE - TRIP GENERATION MANUAL - 9TH EDITION

PM Peak

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

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

increase over previous trip assignments

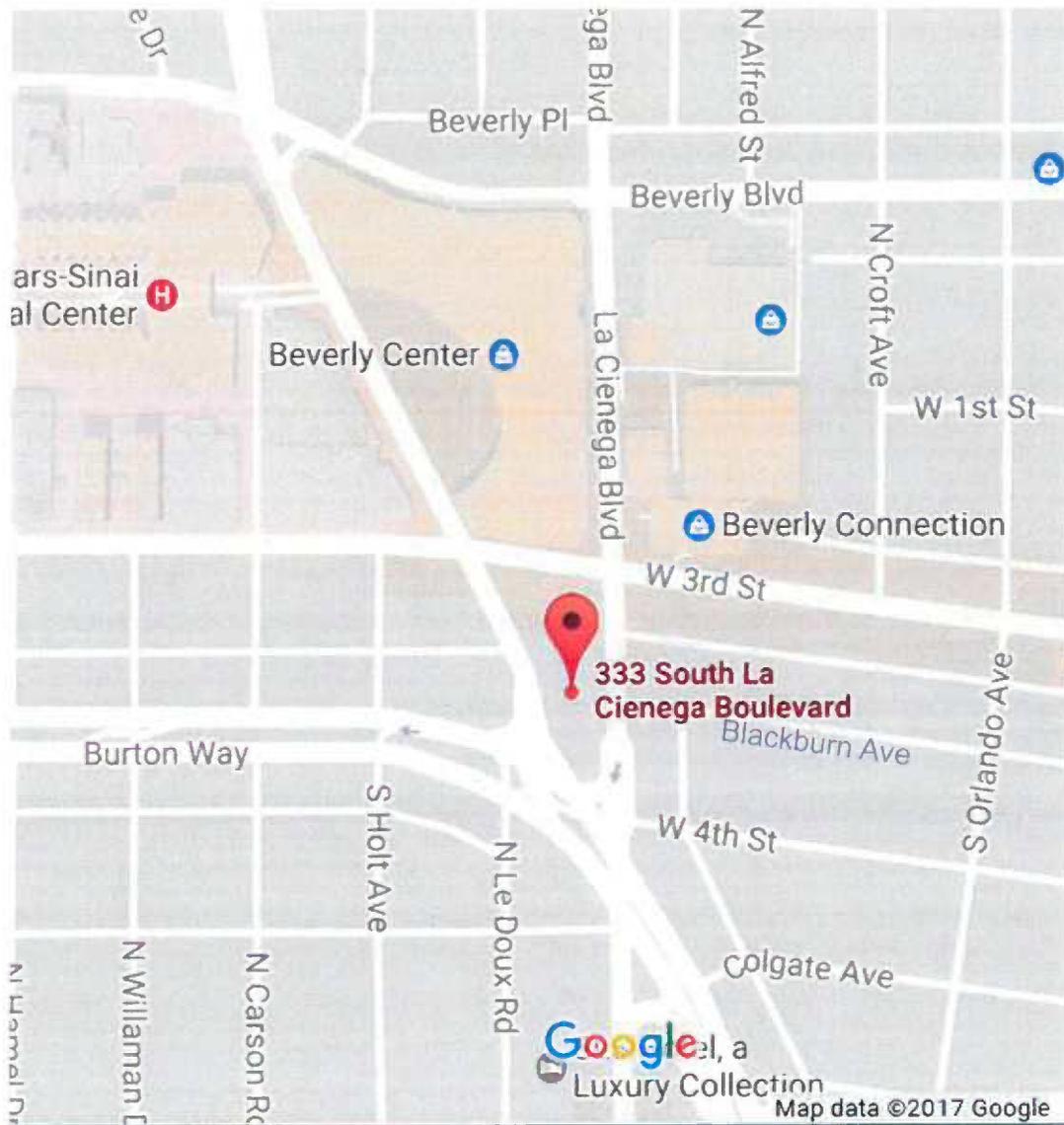
DEIR SCENARIO

114	77	191
adjustment factor		1.68

REVISED ALTERNATIVE

107	76	183
adjustment factor		1.75

ATTACHMENT 6
Project Location Map



3. FUTURE TRAFFIC CONDITIONS

PROJECT TRAFFIC

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

Project Traffic Generation

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

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

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

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

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



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

Date: 1/18/17

Submitted in PLUM Committee

Council File No. 16-1368 & 16-068-82

Item No. 7 AND 8

PUBLIC COMMENT

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

January 18, 2017

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

PLUM Members,

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

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

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

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

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

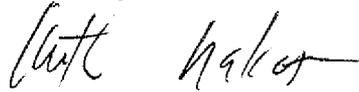
This use is a far more beneficial use of the site adjacent to the main Cedar Sinai campus and will provide far better jobs and is far better for the overall community. It also can be achieved within the existing Wilshire Community Plan.

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

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

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

Sincerely,

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

Keith

Keith Nakata

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

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Councilmember Herb Wesson
For Inquiries, Wally Marks 310-204-1865

January 18, 2017

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

Chair

LOS ANGELES CITY PLANNING COMMISSION

City of Los Angeles

200 North Spring Street

Los Angeles, CA, 90012-2601

Re: 333 S La Cienega Boulevard

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

Date: 01/18/2017

Submitted in PLUM Committee

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

Item No. 748

Comm from Public

Dear Mr. Ambrose and fellow Commissioners:

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

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

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

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

Thank you for your consideration on this matter.

MIRACLE MILE CIVIC COALITION



Lyn MacEwen Cohen
President



Wally Marks
Vice President

cc: City Councilman Paul Koretz CD5

Date 1/18/17
Submitted in PLUM Committee
Council File No 16-1503 16-1568 57
Item No. 7 § 7

January 18, 2017

7, 8

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

Communication
from public

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

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

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

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

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