



April 30, 2024

Ms. Kimberly Feder
CASTELLAMMARE MESA HOMEOWNERS ASSOCIATION
17907 Tramonto Drive
Pacific Palisades, CA 90272

**Subject: Revello Drive & Tramonto Drive Residential Project Traffic & Transportation
Evaluation Peer Review, City of Los Angeles, California**

Dear Kim,

MAT Engineering, Inc. (Consultant) has conducted a peer review of the transportation/traffic-related analysis and evaluation for the Revello Drive & Tramonto Drive Residential Project and provides the following comments.

The proposed project generally consists of development of four (4) large homes within an existing sloped area along Tramonto Drive and Revello Drive in the Pacific Palisades area of the City of Los Angeles. Construction of the four homes will also require consolidation of twelve (12) existing lots.

The proposed project will also include a 200-foot extension of Revello Drive to the west from its existing easterly terminus to provide vehicular access to three (3) of the proposed residences which front Revello Drive. Additionally, a turnaround will be provided.

MAT Engineering Inc. has reviewed the following documents as it relates to transportation and traffic elements of the proposed project:

- Revello Drive and Tramonto Drive Initial Study (Dudek, July 2021);
- Traffic Management Plan for the proposed project;
- VMT (Vehicle Miles Traveled) Analysis for the proposed project; and
- Wildfire evaluation checklist contained in the Initial Study for the proposed project.

Comment 1:

How does the proposed turnaround on the narrow Revello Drive accommodate vehicle movements? It is recommended a truck and vehicle turning maneuver exhibit be prepared to show the movement and turning maneuvers for vehicles utilizing the turnaround.

Comment 2:

The Vehicle Miles Traveled (VMT) analysis sheets appear to show each project evaluated as a separate home. Since piecemealing of projects is not allowed in CEQA, the VMT calculation sheets require assessment of the proposed project as a whole with 4 homes.

Comment 3:

The transportation analysis does not appear to evaluate the potential traffic-related issues during the construction phase of the project and the potential for slow-moving trucks blocking the roadway and creating a safety hazard by limiting emergency access to the area. Even though efforts will be made to minimize these impacts, the impacts might not be fully mitigatable and hence require an Environmental Impact Report (EIR) for the project instead of a Mitigated Negative Declaration (MND). It appears no feasible measure has been identified which can fully mitigate the potential for trucks and construction vehicles negatively impacting access for residents and emergency vehicles.

Comment 4:

It is understood that Revello Drive will be extended approximately 200 feet with an upward slope. This roadway profile would potentially make it infeasible for Revello Drive to be further extended and reconnected which would likely be required to provide access to future homes built on the adjacent vacant lots and parcels along Revello Drive.

Once the project is constructed, making any further modifications to Tramonto Drive and Revello Drive will be much more challenging, if not impossible.

Comment 5:

According to the Project Description, the project would include approximately 33,794 cubic yards (CY) of export earth material and the only types of trucks permitted for hauling earth in a hillside development project are 10-wheeler dump trucks with a capacity of 10 CY.

This means that removal of earth material from the site would require almost 6,800 truck trips (total of inbound and outbound) along the haul route, in addition to everyday construction traffic generated by the Project (material delivery, workers' vehicles, etc.). This calculation does not include the bulldozers, backhoes, wheel loaders, graders, roadway pavers, cement mixers, pile drivers and trucks capable of hauling the machines and materials necessary to install the shear pins, tiebacks and other possible solutions.

To provide a better understanding of the magnitude of the construction trips for the reader, please provide a numerical quantification of construction truck and worker trips for each construction phase since the area would likely require extensive earth work to accommodate the homes and also the roadway extension.

Comment 6:

The Castellamare Mesa area has limited points of access. One from Porto Marina Way connecting to State Route 1 and another via Tramonto Drive connecting to Los Liones Drive and Sunset Boulevard. Both roadways have limited and narrow widths with sharp turns which can potentially result in blockage of access by slow-moving trucks during construction activities of the project.

Even without the added project's construction traffic, based on a recent site visit, in some areas, the narrow roadways in the community are further constricted and impacted by vehicles parking on the street or existing construction taking place at homes in the area.

Continued availability of emergency access to the area becomes even more critical when considering the nature of the area being designated as a High Fire Severity Zone, along with its susceptibility to slope failure and landslide hazards which are also discussed and acknowledged in the Initial Study.

Comment 7:

Revello Drive and Tramonto Drive at the bulkhead are currently narrow to the point where two vehicles cannot pass each other when vehicles are parked in front of their homes. These two roads constitute the primary haul routes for the thousands of heavy construction vehicles proposed in the project plan. Pedestrian traffic with their pets (which is common throughout the day) will also impede movement of vehicles on the narrow segments along the bulkhead shoring on Tramonto and create a traffic bottleneck resulting in conflicts between pedestrian and vehicle traffic.

It is understood that Tramonto Drive will include a sidewalk along the existing bulkhead shoring. If this improvement is planned within the existing right-of-way and pavement width, it will prevent the road from being widened in future to its original width of 36 feet which would provide adequate vehicle travel going both way and a protected pedestrian sidewalk. Once the project is constructed, making any

further modifications to Tramonto Drive and Revello Drive will be much more challenging, if not impossible.

Comment 8:

Since the roadways are narrow, the cumulative effect of the project construction traffic and its addition to the other existing and planned construction activities in the area is even more critical. How would the added project construction traffic be planned around other construction activities in the area to ensure minimal interference and avoid roadway blockage and the safety of pedestrians who walk this neighborhood daily?

Comment 9:

Page 12 of the Initial Study: Transportation is not identified as an element that is potentially affected by the project. Considering the limited roadway access and narrow roadway widths, the project construction traffic might adversely affect safety by resulting in longer response times for emergency vehicles and residents in the area.

Comment 10:

As identified in the Initial Study, the environmental document should evaluate both potential on-site and off-site impacts resulting from the proposed project. This could include the effect of project construction activities on off-site and surrounding roadways and access.

Comment 11:

As stated on Page 13 of the Initial Study, once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

The project construction traffic could impede the movement of emergency vehicles and affect response time. Since this can be considered a potentially significant impact, further analysis and investigation and preparation of an EIR could be warranted.

As acknowledged in the Initial Study, even a potentially significant impact would require preparation of an EIR.

Comment 12:

As identified on page 20 of the Initial Study, approximately 33,794 cubic yards of earth work is required for the project. On average, a truck can hold approximately 10 to 15 cubic yards, requiring a total of approximately 6,758 truck trips (3,379 inbound trips and 3,379 outbound trips). This can be a substantial number of truck trips depending on the duration of the construction. This also does not appear to include vehicle worker trips or the earthwork quantities related to the extension of Revello Drive. Per the Initial study, up to 80 workers are expected per day. This would result in approximately 160 trips per day (80 inbound trips and 80 outbound trips), not accounting for workers leaving for lunch breaks, etc.

Comment 13:

Please provide a quantification of the number of worker vehicles. This will assist in determining the number of parking spaces required to ensure the parking and staging exhibits contained in the Traffic Management Plan show adequate parking for the workers and construction-related vehicles since at this point, it is not known or quantified how many vehicles can be expected.

Comment 14:

Transportation Section of the Initial Study Page 116: The Initial Study identifies a less than significant impact for emergency access. Even though the project might not significantly impact emergency access after its construction, the construction activities will limit and adversely affect emergency access to the area due to narrow roadways and limited access to the area by slow-moving construction vehicles blocking emergency vehicle access on narrow roadways. This could be considered potentially significant impact and require further analysis and investigation.

Comment 15:

The Traffic Management Plan (TMP) for the project states that projects in hillside communities on streets less than 24-feet wide would require a TMP. However, the Initial Study appears to state 20-feet as the threshold.

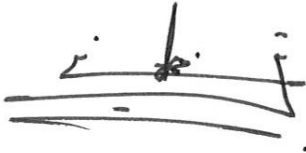
Comment 16:

The Chabad of Pacifica Palisades is generally located on the corner of Sunset Boulevard and Los Lions Drive. The construction traffic and activities of the project would need to be coordinated with events at this and other nearby facilities and schools to ensure construction traffic does not occur when events are held. The Traffic Management Plan for the project does not appear to address traffic conflicts between the project construction traffic and the traffic associated with the Chabad and other nearby facilities which might produce a surge of traffic in a short period of time.

Attachment A shows field photos of the narrow roadways and circulation system being blocked and further constricted by other construction projects and equipment in the area as well as congestion observed on the roadway system. These serve as examples of how even smaller projects have been able to impede traffic flow in the area.

MAT Engineering Inc. appreciates the opportunity to provide this review. If you have any questions, please contact us at 949-344-1828 or at@matengineering.com.

Respectfully submitted,
MAT ENGINEERING, INC.



Alex Tabrizi, PE, TE
President



Attachment A

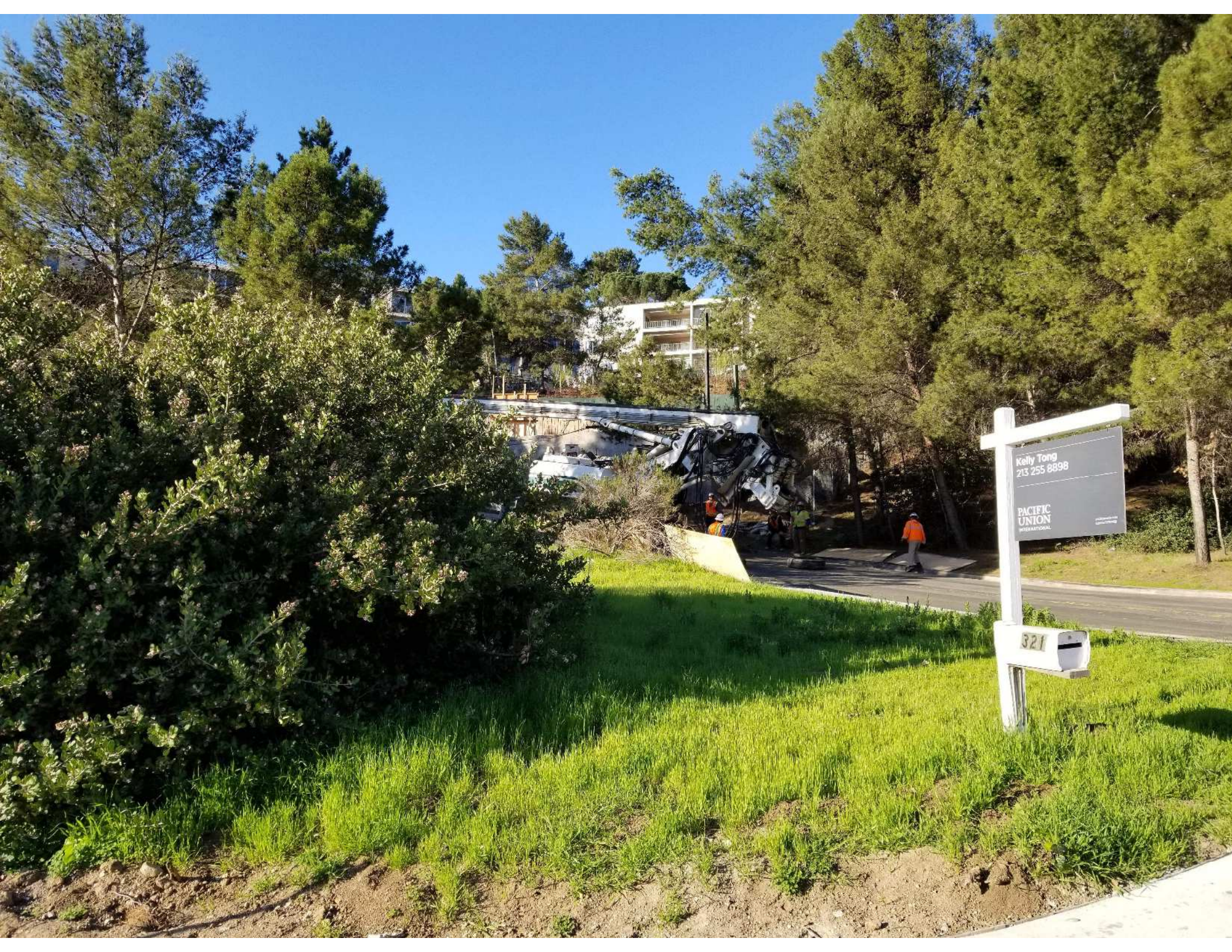
Field Photos



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