

Sheri L. Bonstelle
sbonstelle@jmbm.com

1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308
(310) 203-8080 (310) 203-0567 Fax
www.jmbm.com

October 3, 2022

Chair Harris-Dawson and Members of the
Planning and Land Use Management Committee
200 N. Spring Street Room 240
Los Angeles, CA 90012
Attn: Candy Rosales, Legislative Assistant
clerk.plumcommittee@lacity.org
LACouncilComment.com

Re: 656 S. San Vicente (CPC-2017-467-GPA-VZC-HD-SPR)
Council File Nos. 22-0922, 0922-S1, 0922-S2
Hearing Date: October 4, 2022 Item: 12, 13, 14

Dear Hon. Chair Harris-Dawson and Members of the PLUM Committee:

Our firm represents 650 - 676 SSV Property Owner, LLC and 650 SSV Property Owner, LLC, (collectively, "Stockdale") the owners and the Applicant for the medical office project located at 650-656 S. San Vicente Boulevard. (the "Project"). The City Planning Commission unanimously approved the Project on June 23, 2022, and the Mid-City West Neighborhood Council Project also voted to support the Project (See Exhibit A, Ex.1).

At the request of Councilmember Paul Koretz, the Project includes community benefits and measures to respond to neighborhood concerns, specifically regarding parking and traffic. Stockdale entered a Letter of Intent, and is committed to a Project Labor Agreement with the Construction Trades Union to ensure a living wage and quality jobs for the community. The agreement will also include local hire provisions. At the request of the Council office, Stockdale will provide \$100,000 to the Neighborhood Traffic Management Program to ensure that the neighbors' requested traffic improvements are funded. This fee will be used in five years or refunded to the Applicant to ensure that the funds are used to benefit the neighborhood. In response to discussions with the Mid-City West Neighborhood Council, Stockdale agreed to provide public outdoor benches and information regarding the selection of the street trees. At the request of the Council office, Stockdale also agreed to prohibit right turn lanes out of the employee exit to limit traffic on Orange Street, and to require that 20 percent of the medical office use be allocated to medical lab space that utilizes less parking. Stockdale also conducted parking studies to ensure that the on-site parking is sufficient at peak use periods.

In addition, The Project will be sustainable by supporting alternative modes of transportation through use of extensive bicycle valet, on-site showers, Metro TAP cards, and EV

charging stations and complying with the CalGreen Code. The Project will include a ground level pedestrian streetscape, including a restaurant with outdoor seating, and public landscaped areas with benches for seating. The Project will improve S. San Vicente, Orange Street, and Sweetzer Avenue to provide pedestrian safety and refuge areas, including landscaped space for pedestrians and public furniture. The Project will also add a medical related use to the growing medical corridor around Cedar Sinai Medical Center that stretches south on San Vicente and allows the industry to concentrate medical-related uses to benefit patients and service providers and reduce traffic. Stockdale did significant outreach to the immediate neighbors and greater community to address their comments and concerns, as outlined in the letter to the Planning Commission from Nicole Kuklok Waldman at Collaborate, dated June 13, 2022.

The Planning Commission approval was appealed by (i) Diana Plotkin of the Beverly Wilshire Homes Association, (ii) Michael Yadegari of YAD LA Lawyer, Inc., and (iii) SAFER, an El Monte organization founded in 2021 that supports use of union labor. The appeals do not present any new studies, evidence or claims that were not previously considered by the Planning Commission, and none of the claims has legal merit. These claims are refuted in the City Staff Report, dated October 4, 2022, and the Letter from JMBM to the Planning Commission, dated June 13, 2022. (Exhibit A)

We respectfully request that the City Council approve the medical office Project and deny the appeals.

Very truly yours,



SHERI L. BONSTELLE for
Jeffer Mangels Butler & Mitchell LLP

SLB

Exhibit A: JMBM Letter to City Planning Commission, dated June 13, 2022
Exhibit A, Ex 1: Mid-City West Neighborhood Council Approval

cc: Councilmember Paul Koretz (Paul.Koretz@lacity.org)
Dylan Sittig, CD5 Planning Deputy (Dylan.Sittig@lacity.org)
Paul Caporaso, City planner (Paul.Caporaso@lacity.org)
Kimberly Henry, City planner (Kimberly.Henry@lacity.org)
Milena Zasadzien, City planner (Milena.Zasadzien@lacity.org)

Benjamin M. Reznik
bmr@jmbm.com

1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308
(310) 203-8080 (310) 203-0567 Fax
www.jmbm.com

June 13, 2022

BY EMAIL

President Millman and Members of the
City Planning Commission
200 N. Spring Street
Los Angeles, CA 90012
Attn: Cecilia Lamas, Executive Assistant
E-Mail: cpc@lacity.org

Re: 650-656 S. San Vicente Boulevard
CPC-2017-467-GPA-VZC-HD-SPR; VTT-74865
ENV-2017-468-EIR
Hearing Date: June 23, 2022

Dear President Millman and Members of the City Planning Commission:

Our firm represents Stockdale Capital Group LLC ("Stockdale"), and 650-676 SSV Property Owner, LLC and 650 SSV Property Owner, LLC, the owners of the property at 650-656 S. San Vicente Boulevard at Wilshire Boulevard (the "Property"). Stockdale has extensive experience in managing and developing medical buildings, and proposes a mixed-use medical office development on the Property within the medical corridor along San Vicente near Cedar Sinai Medical Center. (the "Project")

I. SUMMARY

The Project. The Property is located on the corner of San Vicente Boulevard and Wilshire Boulevard within a block of the La Cienega Metro Station in a Transit Priority Area. It is surrounded by large office and medical buildings on these streets, including the 22-story Cedar Sinai medical office tower across the street, with multi-family neighborhoods to the east and to the south across Wilshire Boulevard. The proposed Project consists of 140,305 square feet of medical office and medical lab space, 5,000 square feet of ground level commercial use and restaurant with outdoor seating, and a full valet parking and bicycle garage for expedited service.

Benefits. The Project provides many public benefits to the immediate neighborhood and to the greater community. Stockdale entered a Letter of Intent, and is committed to a Project Labor Agreement with the Construction Trades Union to ensure a living wage and quality jobs for the community. The agreement will also include local hire provisions. At the request of the Council office, Stockdale will provide \$100,000 to the Neighborhood Traffic

Management Program to ensure that the neighbors' requested traffic improvements are funded. This fee will be used in five years or refunded to the applicant to ensure that the funds are used to benefit the neighborhood. In response to discussions with the Mid-City West Neighborhood Council, Stockdale agreed to provide public outdoor benches and information regarding the selection of the street trees. At the request of the Council office, Stockdale also agreed to prohibit right turn lanes out of the employee exit to limit drivers on Orange Street, and to require that 20 percent of the medical office use be allocated to medical lab space that utilizes less parking.

The Project will be sustainable by supporting alternative modes of transportation through use of extensive bicycle valet, on-site showers, Metro TAP cards, and EV charging stations and complying with the CalGreen Code. The Project will include a ground level pedestrian streetscape, including a restaurant with outdoor seating, and public landscaped areas with benches for seating. The Project will improve S. San Vicente, Orange Street, and Sweetzer Avenue to provide pedestrian safety and refuge areas, including landscaped space for pedestrians and public furniture. The Project will also add a medical related use to the growing medical corridor around Cedar Sinai Medical Center that stretches south on San Vicente and allows the industry to concentrate medical-related uses to benefit patients and service providers and reduce traffic.

Project Support. Stockdale did significant outreach to the immediate neighbors and greater community to address their comments and concerns, as outlined in the letter from Nicole Kuklok Waldman at Collaborate, dated June 13, 2022. (See Collaborate Letter, sent separately) Collaborate has worked with the Council Office, neighbors, local stakeholders, and the Neighborhood Council since 2019 to ensure that the stakeholders understand the Project and how the process has moved forward. These included sending more than 3,500 mailers to neighboring households in June 2020 advising them of the Project process, in addition to City noticing, as well as offering a series of online sessions where Collaborate answered questions about the Environmental Review process. In July 2021, Collaborate sent a second set of mailers to the same households advising of EIR availability and again hosted a series of online sessions about the Environmental Review process. Collaborate also engaged in a texting campaign to advise neighbors of the Project, and conducted a door-to-door canvass to advise neighbors of the Project. They also held a number of in person meetings at neighbor's homes, and frequently responded to neighbors questions on call, e-mail and text. Collaborate submitted more than 200 support letters, e-mails and cards to the City from Project neighbors. (See Collaborate Letter) The Project also received nearly unanimous approval from the Mid-City West Neighborhood Council. (See Exhibit A)

Appeals. The Advisory Agency approved the Vesting Tentative Tract Map for the Project, which was appealed by (i) Diana Plotkin of the Beverly Wilshire Homes Association ("BWAHA Appeal"), (ii) Michael Yadegari of YAD LA Lawyer, Inc. ("MY Appeal"), and (iii) SAFER, an El Monte organization founded in 2021 ("SAFER Appeal") that supports use of union labor and is currently opposing and appealing dozens of development projects across Los Angeles, Orange County and the Inland Empire. The appeals do not present any new studies, evidence or

claims that were not previously considered by the Advisory Agency, and none of the claims has legal merit. The Project Draft Environmental Impact Report ("EIR") and Final EIR determined that the Project has no significant environmental impacts under the California Environmental Quality Act ("CEQA"), except for temporary construction noise and vibration impacts to the immediately adjacent multi-family building across the alley, which have been mitigated to the greatest extent possible through insulated construction barriers and specific construction conditions. The claims are further discussed and refuted below.

II. None of the Issues in the Three Appeals Has Legal Merit, and All Issues Were Previously Considered by the Advisory Agency in Its Approval of the VTTM.

A. BWAH Appeal. The BWAH Appeal claims that: (i) the VTTM is inconsistent with the General Plan because the VTTM is conditioned on the City Council's approval of the General Plan amendment; (ii) the Project results in inadequate fire and emergency medical service response due to distance from the fire station; (iii) the Project violates the Zoning Code and City Charter, because the general plan amendment must be one of "significant, economic or physical identity;" (iv) the Project is inconsistent with the Wilshire Community Plan for locating a high-rise project near residential streets and further reducing the LOS on impacted streets; (v) the General Plan has policies that expressly address neighborhood intrusion traffic; (vi) the location of the site has physical hazards, such as a liquefaction and methane zone, which prohibits residential uses, and prohibits a medical office use because it is on a small frontage road; and (vii) the site will cause substantial environmental damage outside of CEQA, including GHG and shade/shadow impacts.

None of these claims has legal merit. First, the Advisory Agency Decision Letter approving the VTTM, dated April 26, 2022, specifically requires that the Project obtain the General Plan amendment and zone change under CPC-2017-467-GPA-VZC-HD-SPR. If the Zone Change/General Plan Amendment is not approved by the City Council, then only the existing density under the code will be permitted on the VTTM. This is the standard process implemented for every VTTM in the City on a project with a zone change or general plan amendment request.

Second, as set forth in the Project EIR, the Project does not have inadequate fire and emergency medical service response. (See Final EIR, Response to Comment No. ORG 1-15, Draft EIR Section IV.H.1, *Public Services – Fire Protection*) The Project would comply with the applicable Occupational Safety and Health Administration (OSHA), Los Angeles Building Code, Los Angeles Fire Code, other LAMC, and Los Angeles Fire Department (LAFD) requirements. In addition, the Project would comply with LAFD's preliminary recommendations contained in correspondence provided in Appendix I-1 of the Draft EIR. The existing fire stations are greater than 1 mile from the Property; however, compliance with applicable regulatory requirements and recommendations, including LAFD's fire/life safety and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for

new or expanded fire facilities. If these distances are exceeded, all new structures outside of the maximum response distance would be required to install automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Code (e.g., fire signaling systems, fire extinguishers, smoker removal systems, etc.). With such systems installed, fire protection would be considered adequate even if the Project is located beyond the maximum response distance.

Third, the City followed the City's General Plan Amendment procedures for considering and requesting a General Plan Amendment. The General Plan Amendment from Limited Commercial to Regional Center Commercial is full evaluated in the Draft EIR, Land Use and Planning, Section IV.5. The Draft EIR identifies that the Property is surrounded on three sides with properties that have a Regional Center Commercial land use designation, including directly across Sweetzer Avenue to the east, directly across Wilshire Boulevard to the south and east, and directly across Wilshire Boulevard to the south and west. (Draft EIR, Figure IV.F-1) Therefore, the General Plan Amendment is one of significant, economic or physical identity by expanding the adjacent Regional Center Commercial land use designation in a Regional Center area that is adjacent to transit. Fourth, the Project is consistent with the Wilshire Community Plan, because it merely expands the Regional Center land use designation and office uses of the surrounding properties that are also within the Wilshire Community Plan area.

Fifth, the BWAH Appeal states that the Community Plan has policies expressly addressing neighborhood intrusion impacts separate from CEQA, but does not specifically identify the policies. The Project does not have any substantial traffic impacts under CEQA (see Draft EIR, Transportation, Section IV.I), but does propose Project conditions to limit traffic from the Project in the adjacent residential neighborhood. These are described further below.

Sixth, the BWAH Appeal claims that both residential and office buildings are not compatible with the site, because it is within a methane and liquefaction zone on a small frontage street. The Project does not include residential uses, and the comment does not provide any reason why the frontage street of a large Boulevard II is not compatible with medical office uses, when all of the adjacent uses on the frontage street are retail, office or medical rehabilitation uses.

Seventh, the BWAH Appeal claims that the Project will cause substantial environmental damage outside of CEQA, including GHG and shade/shadow impacts. The Draft EIR confirms that the Project does not have any GHG impacts (See Draft EIR, Greenhouse Gas Emissions, Section IV.E) or shade/shadow impacts because it is within a Transit Priority Area and exempt from aesthetic impacts under CEQA pursuant to SB743. The comment does not identify specific non-CEQA impacts not otherwise addressed.

B. ***MY Appeal.*** The MY Appeal claims that: (i) the Applicant misstated the reduction in parking requested by the Project; (ii) the Advisory Agency approval based on the DOT Letter that states it did not review the internal circulation or parking scheme is negligence; (iii) the letter from RK Engineering Group, Inc. ("RK"), dated February 24, 2022, ("RK Letter") identified

numerous areas of concern related to traffic and parking; (iv) the 22-story medical office building at 400 S. San Vicente, which has less floor area, should be a comparison of allowable floor area and parking; and (v) the failure by DOT to evaluate internal circulation and driveways is a violation of CEQA.

None of these claims has legal merit. First, the Applicant did not misstate the parking reduction requested for the Project, and the parking was fully discussed and evaluated in the EIR. (See Draft EIR, Land Use and Planning, Section IV.F) The Project uses require 746 parking spaces under the LAMC, and a 20 percent reduction pursuant to legislative action would require 597 parking spaces. For nonresidential uses, the LAMC allows a replacement of up to 30 percent of parking spaces for bicycle spaces in a Transit Priority Area, which would result in 418 parking spaces and 716 bicycle spaces. This is not a reduction in parking requirements, but a replacement of bicycle spaces for vehicle spaces to support sustainable modes of transportation. For additional discussion, see Section II.B below.

Second, the DOT Letter states that it did not review internal circulation and parking, because it is not within the purview for LADOT to review internal parking in a development. The parking and internal circulation were evaluated in the Draft EIR, Land Use and Planning, and the Applicant provided technical parking studies from Gibson Transportation Consulting (See Exhibits 2A, 2B). The driveways and loading dock dimensions will be evaluated by LADBS at the time of building permitting to ensure ministerial compliance. Therefore, there is no CEQA impact caused by DOT not having an obligation to review internal circulation.

Third, the MY Appeal references the RK Letter, which is discussed in detail below in Section II.A.Traffic. None of the RK Letter claims have legal merit or identify any significant impact under CEQA that was not fully evaluated in the Project EIR.

Finally, the Project is not required to have an identical layout, density or parking as another office building constructed in 1962. The medical office building at 400 S. San Vicente is significantly taller than the Project, but has less floor area. There are different floorplate and layout requirements for medical office buildings today based on the way medical office is used and the updates in medical equipment, testing and services. In addition, the City has substantially modified the parking requirements in the past 60 years to support public transportation and use of alternative transportation methods, including requiring bicycle parking for new projects. Therefore, the MY Appeal does not identify any issues that were not fully evaluated and considered, and does not provide any substantial evidence in the record that the EIR failed to fully evaluate the Project in compliance with CEQA

C. **SAFER Appeal.** The SAFER Appeal claims that a revised EIR must be prepared and recirculated based on: (i) The Project should require 15-foot construction barriers along the extent of the neighboring residential boundaries; (ii) the CEQA baseline should be the date of the NOP in January 28, 2020, including the now vacant educational building; and (iii) the Project

height is incompatible with the neighborhood, because there are smaller commercial buildings nearby and a multi-family residential neighborhood to the east that were not identified in the EIR.

None of these claims has legal merit. First, Mitigation Measure NOI-1 requires that the Project provide construction noise barriers at a height of 15 feet along the alleyway along the northeast property line directly across from the multi-family building, which include noise blankets or noise reduction materials that reduce the sound level by 10dBA. The Project is across from office buildings to the north, south and west that are not sensitive receptors. Second, the CEQA baseline is the date of the NOP in January 28, 2020. The prior Montessori use is identified for accuracy, and LADOT allows trip credit for uses within 24 months; however, no credit was taken for the prior school use and the traffic analysis in the EIR is the most conservative, as set forth in the GTC Responses to Comments. (See Exhibit 3, and below)

Third, the EIR accurately describes the surrounding neighborhood, including the multi-family neighborhood to the east, mid-level commercial buildings along San Vicente, and a 10-story building directly to the west, a 22-story building directly to the south, and a 12 story building east of the Project site (See Draft EIR, Project Description, Section II). Therefore, the SAFER Appeal does not provide any substantial evidence in the record that the EIR failed to fully evaluate the Project in compliance with CEQA.

III. The Project fully complies with CEQA, and has no significant environmental impacts other than temporary construction noise and vibration impacts to immediate neighbors.

A. Traffic.

GTC Responses to Comments. The MY appeal attaches a letter by RK Engineering Group, Inc. ("RK"), dated February 24, 2022, ("RK Letter") that was previously provided to the City prior to the VTTM hearing. On March 22, 2022, Gibson Transportation Consulting ("GTC") submitted a technical expert report, Responses to Comments, on behalf of Stockdale that responded to each claim in the RK Letter. (See Exhibit 3) Many of the comments in the RK Letter were questions that were answered by GTC, or were claims of CEQA and traffic impacts that were not, in fact, CEQA impacts. Many of the comments were also repetitive, and so are summarized by topic and not comment number. These responses are summarized below and refute entirely each of the claims in the RK letter.

First, GTC responded that they evaluated the Project trip estimates, trip distribution and trip assigned based on the Los Angeles Department of Transportation ("LADOT") standards through a Memorandum of Understanding (MOU) process with LADOT, instead of applying a less accurate national ULI standard proposed by RK. Second, GTC confirmed that the original Traffic Assessment for the Project took the most accurate assessment at the time and used a conservative analysis to estimate future trips, including taking counts in January and February

2020 prior to the Covid-19 state of emergency, and overestimating actual traffic volume growth to be conservative. Third, although not required under CEQA, GTC ran an additional analysis of an intersection under Beverly Hills standards and determined it would not experience any Project-related delay increases. Fourth, GTC provided links to the TDM requirements in the City of Los Angeles, and confirmed that although a draft TDM plan was provided, a full TDM plan is not required until issuance of building permits. Fifth, GTC provided a summary of the bicycle parking requirements set forth in LAMC § 12.21.A.4, and confirmed that the Project was providing the exact number required by the provisions of the code. See Section II.B below for a parking summary.

Sixth, GTC confirmed that they performed a detailed assessment in Section 3D of the GTC Transportation Assessment, and the Project does not present any geometric design hazards related to traffic movement, mobility or pedestrian accessibility, and that the Project is not altering the geometry of the site, and does not have direct access from Wilshire Boulevard or San Vicente Boulevard (except the frontage road) to the site. Seventh, GTC confirmed that the Project will remove 10 metered parking spaces on Orange Street and the S. San Vicente frontage road, but would maintain all of the remaining meters on these streets. The meters primarily served the commercial and prior educational uses on the site. Eighth, GTC summarized the queuing analysis provided in Appendix E of the GTC Transportation Assessment, and to be conservative, the Project was analyzed using the 85th percentile for signalized intersections and 95th percentile for unsignalized intersections, which complies with HCM methodology. In addition, GTC notes that operational intersection analysis is no longer considered a CEQA impact under SB743. Ninth, GTC confirmed that the GTC Transportation Assessment takes reductions for pass-by trips for each use based on rates published by ITE, and approved in consultation with LADOT during the MOU process.

Tenth, GTC noted that the intersection of Wilshire and San Vicente currently has a Level of Service (LOS) at F, and will continue to operate at LOS F in peak hours with or without the Project. However, LOS is no longer a CEQA consideration, and instead VMT analysis is required by State law under SB743. A goal of the law was to help California combat climate change by reducing GHG related to transportation, and so evaluates the distance travelled from home to work and the impact on the greater, not local, environment. Therefore, the Project, which is an employment center project near Transit has a lower VMT impact. Eleventh, the GTC Transportation Assessment used public trip generation rates in the Trip Generation Manual, 10th edition to estimate Project peak hour rates. The trip reductions were based on public transit, trips shared with different uses, and the nearby pedestrian designations in the urban area. Each reduction was approved by LADOT during the MOU process.

Twelfth, GTC noted that the residential street segment analysis identified potential increases in average daily traffic volumes on Local Streets. The estimate of 309 Project daily trips on Orange Street is conservative, and does not take credit for the existing Big 5 store or prior school use. Project traffic is not anticipated to add a substantial amount of traffic to any other

adjacent residential street, because they do not provide direct access to the Project site. The Project will contribute toward neighborhood improvements and traffic calming measures as part of the Neighborhood Traffic Management Plan, including TDM and parking management strategies. Thirteenth, GTC confirmed that two-way travel would be maintained around the Project during construction, but there will be potential temporary loss of access and parking during Project construction, as outlined in Section 4F of the GTC Transportation Assessment. Fourteenth, GTC confirmed that the Haul Route sets the time and route of hauling, and includes trucks leaving and entering the site from San Vicente Boulevard, and not local streets. Fifteenth, GTC confirmed that a detailed Construction Management Plan that includes street closures, detour plan, haul route and staging plan would be provided prior to issuance of building permit.

Sixteenth, GTC gave a detailed summary of the vehicle parking and bicycle parking requirements in the code and the method for GTC's calculations of the parking required for each use based on empirical data. Seventeenth, GTC confirms that the split between medical office visitors and employees in the GTC Supplemental Parking Analysis, was accurate based on empirical data collected at 9090 Wilshire Boulevard. Additional reductions were applied to account for walk in visitors or transit users. The driving adjustment also accounts for the growing number of visitors and employees that utilize rideshare.

In summary, the Draft EIR, Transportation, Section IV.I, GTC Parking Analysis and GTC 2nd Parking Analysis fully evaluated the transportation and parking impacts for the Project. The RK Letter did not identify any traffic or parking impacts under CEQA, or any non-CEQA traffic or parking issues that were not fully evaluated in the EIR or GTC's Parking Analyses.

B. ***Parking.***

LAMC Parking Requirements. As set forth in the Draft EIR and Final EIR, the Project requires a total of 746 parking spaces, including 702 spaces for medical office (1space/200sf), 40 spaces for restaurant use (1space/100sf) and 4 spaces for commercial use (1space/250sf).(LAMC § 12.21.A.4 (c)) The Project also requires 15 bicycle spaces. (LAMC § 12.21.A.16)

The LAMC permits a change of the parking requirements not to exceed a 20 percent reduction of the amount required by the code by legislative action. LAMC § 12.32.P states: "*Minor Changes to Parking Requirements Incident to Legislative Actions. As part of any legislative land use ordinance, the Council may approve changes to the parking requirements not to exceed 20% of the requirements otherwise required by the Code.*" The legislative approval would change the parking requirements for the Project to 597 parking spaces.

The LAMC also permits non-residential buildings within 1,500 feet of a Transit Stop to replace up to 30 percent of the required parking with bicycles at a ratio of 4:1. This is by-right in the code and can be applied by LADBS at building permitting without discretionary

approval. If the Project replaced 30 percent of the required 597 parking spaces with bicycle spaces, it would be required to provide 418 vehicle spaces ($597 \times .7$) and to replace the remaining 179 spaces ($597-418$) with 716 bicycle spaces (179×4). This is not a reduction in parking requirements, but a replacement of bicycle spaces for vehicle spaces to support sustainable modes of transportation.

GTC Supplemental Parking Analysis. GTC provided a Parking Analysis, dated January 4, 2022, that analyzed the applicable parking rates for the Project's proposed land uses, including review of empirical parking demand data collected at medical office uses, and resulting peak parking demand. The Project includes 418 striped/stacked parking spaces and 33 unstriped or aisle spaces within the on-site parking levels for a total of 451 spaces available to the full time parking valet. Pursuant to the Supplemental Parking Analysis, the Project, including 1,000 square feet of retail, 4,000 square feet of restaurant and 140,305 square feet of medical office space requires a total of 422 spaces at the peak parking demand. The peak parking demand represents the highest hour parking demand on a typical weekday. The 451 available spaces exceeds the amount required during peak parking demand (see Exhibit 2A)

Supplemental 2nd Parking Analysis for Medical Lab Use. GTC provided Supplemental Parking Analysis for Refined Project, dated January 31, 2022 to calculate the required parking if up to 20 percent of the medical office floor area is used for medical lab. If 20 percent of the medical office is changed to medical lab, which does not have patient visits, there would be 28,061 square feet of medical lab use and 112,244 square feet of medical office use. Pursuant to the Supplemental 2nd Parking Analysis, the revised Project with 20 percent medical lab use would require 386 parking spaces at the peak parking demand. This is less than the 418 striped/stacked parking spaces and the 451 total spaces available in the Project. (see Exhibit 2B)

Parking Design and Valet. The parking design includes four (4) level floors with a height to accommodate double-height parking stackers. The parking floors were designed to be level with connecting ramps and additional height to allow for adaptive reuse to non-parking uses in the future as an element of sustainable design.

The parking design would include two lanes of drop-off valet on the ground level, and one lane of vehicle retrieval on the ground level, which exceeds the LADBS 60-foot reservoir requirement (See Exhibit 3), and would prohibit queuing into the San Vicente access street. The parking garage would be staffed with sufficient valet workers on every level to return vehicles within five (5) minutes of request at all times, including during peak hours.

The parking levels cannot be located underground, because the Project site has a large 12 foot concrete culvert and easement for stormwater that runs directly under the middle of the site. In consultation with BOE, the City confirmed that the Project must provide a significant distance on either side of the culvert to support it structurally, and so cannot provide underground

construction, especially with a 30 foot water table. The building lobby is located on top of the culvert, and will provide access as required by BOE.

C. *Noise.*

The Project has a single significant construction noise and vibration impact to the adjacent multi-family residential building across the alley on Sweetzer Avenue. The Project will mitigate the impacts to the greatest extent possible by (i) providing a 15-foot noise barrier with noise blanket or reduction materials along the entire length of the alley and a minimum 8-foot noise barrier around the remainder of the Property with a 10 dBA reduction, (NOI-MM-1), (ii) requiring any noise or vibration-generating equipment with a flexible location to be at least 100 feet from sensitive uses, including the adjacent multi-family building (NOI-MM-2), (iii) requiring state-of-the-art noise shielding and muffling devices on power construction equipment, and sound control curtains on all drilling apparatus, rigs and jackhammers with a 10dBA reduction (NOI-MM-3), and (iv) requiring a construction liaison to provide 2-week notice to sensitive receptors, including the adjacent multi-family apartment, when peak noise and vibration activity will occur. (NOI-MM-4) These conditions will ensure the most reduction in noise that is feasible near a construction site, and will provide the adjacent tenants with notice of the construction schedule.

D. *Design/Aesthetics.*

The Project is within a Transit Priority Area, and under SB 743, employment center projects do not have a significant aesthetic or parking impact under CEQA. The intent is to support density near transit in order to increase the sustainable benefit of the mass transit system and locate the maximum number of residences and jobs near transit to encourage use. Therefore, the City cannot require shade/shadow studies or deny residential and employment center uses due to shade or shadow caused by these developments.

IV. **The Project has no traffic impacts under CEQA, but proposes project conditions to limit travel on adjacent residential streets pursuant to a Neighborhood Traffic Management Plan.**

The Draft EIR, Transportation section, Section IV.I, concludes that the Project will not cause a significant traffic impact on the environment under CEQA pursuant to the required VMT analysis. The Project proposes to permit only left turns out of the employee entrance to the parking structure on Orange Street, which would require the employee to drive north on the San Vicente frontage road to exit on San Vicente Avenue and 6th Street. This would limit the number of drivers on Orange Street and Sweetzer Avenue that exit the building towards the residential neighborhood to the east. The Project also proposes to provide 20 percent of the medical office use as medical lab use, which will significantly reduce the number of parking spaces needed for the Project uses (See Exhibit 2B) Third, the Applicant agreed to fund \$100,000 to the Neighborhood Traffic Management Program so that the Council office and the neighbors can

agree on neighborhood traffic or parking improvements. Fourth, the Applicant agreed to provide a month of Metro TAP cards to new employees to encourage them to take public transportation instead of parking in the building. Fifth, the Project provides significant valet bicycle parking and on-site showers. These measures will reduce parking in the building by supporting use of alternative modes of transportation, and reduce traffic in the residential neighborhood to the east by directing traffic towards the commercial street of San Vicente Boulevard.

V. The Project provides significant community benefits.

The Project will provide significant community benefits by locating an employment center medical office project a block from the new Metro Station in a Transit Priority area. The Project will be sustainable by supporting alternative modes of transportation through use of extensive bicycle valet, on-site showers, Metro TAP cards, and EV charging stations and complying with the CalGreen Code. The Project will include a ground level pedestrian streetscape, including a restaurant with outdoor seating, and public landscaped areas with benches for seating. The Project will improve S. San Vicente, Orange Street, and Sweetzer Avenue to provide pedestrian safety and refuge areas, including landscaped space for pedestrians and public furniture. The Project will provide union construction jobs, living wages, and local hire, as guaranteed by the Letter of Intent for a Project Labor Agreement with the Construction Trades union. The Project would also pay \$100,000 to the Neighborhood Traffic Management Program to fund the neighbor's requested traffic and parking improvements in the residential neighborhood to the east. The Project will also add a medical related use to the growing medical corridor around Cedar Sinai Medical Center that stretches south on San Vicente and allows the industry to concentrate the medical-related uses to benefit patient needs.

In conclusion, we respectfully request that you approve the medical office and retail/restaurant Project as designed, and deny the three appeals of the Vesting Tentative Tract Map.

Sincerely,



BENJAMIN M. REZNIK and
SHERI BONSTELLE of
Jeffer Mangels Butler & Mitchell LLP

BMR
Enclosures

President Millman and Members of the City
Planning Commission
June 13, 2022
Page 12

Exhibit 1: Mid-City West Neighborhood Council Approval
Exhibit 2A: GTC Supplemental Parking Analysis, dated January 4, 2022
Exhibit 2B: GTC Supplemental 2nd Parking Analysis for Refined Project, dated
January 31, 2022
Exhibit 3: GTC Response Letter to RK Engineering Letter, dated March 22, 2022

cc: Councilmember Paul Koretz (Paul.Koretz@lacity.org)
Dylan Sittig, CD5 Planning Deputy (Dylan.Sittig@lacity.org)
Paul Caporaso, City planner (Paul.Caporaso@lacity.org)
Kimberly Henry, City planner (Kimberly.Henry@lacity.org)
Milena Zasadzien, City planner (Milena.Zasadzien@lacity.org)



5101 Santa Monica Blvd., Ste. 8 PMB #268
 Los Angeles, California 90029
 Telephone (323) 285-3540
www.midcitywest.org

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 February 08, 2022**

February 19th, 2022

**Paul Caporaso, Planning Assistant
 200 N Spring St, Suite 525
 Los Angeles, CA 90012**

Dear Mr. Caporaso,

We appreciate the opportunity to comment on this application as the certified neighborhood council serving the area where the San Vicente Medical Office Project is proposed.

The application for the development was presented to our February board meeting. The board of Mid City West Neighborhood Council voted to support the project application to this end, with a condition that the applicant provides free Metro TAP Cards with one month's worth of fares to every employee on site, and that they consider adding benches with armrests in the street furniture zone.

Thank you for your attention to this matter. Please email me at xwikstrom@midcitywest.org if you have any questions.

Sincerely,

Xander Wikstrom, Secretary of Planning and Land Use Committee
 Mid City West Neighborhood Council

Cc: Office of Council District 5, Hon. Paul Koretz via email
 Office of Council District 5, Daniel Skolnick via email
 Office of Council District 5, Jill Kline via email
 Sheri Bonstelle via email

MEMORANDUM

TO: Bryan Fairbanks, Stockdale Capital Partners, LLC

FROM: Sarah M. Drobis, P.E., and Casey Le, P.E.

DATE: January 4, 2022

RE: Supplemental Parking Analysis for the
656 South San Vicente Medical Office Project
Los Angeles, California

Ref: J1534

Gibson Transportation Consulting, Inc. was asked to provide supplemental parking information and analysis for the 656 South San Vicente Medical Office Project (Project). The supplemental analysis includes an evaluation of applicable parking rates for the Project's proposed land use types, including review of empirical parking demand data collected at medical office uses, and resulting peak parking demand. This memorandum summarizes our analysis.

PROJECT BACKGROUND

The Project includes a 140,305 square foot (sf) medical office building and approximately 5,000 sf of commercial space, including 4,000 sf of restaurant use and 1,000 sf of retail/pharmacy use. The on-site building that formerly operated as a private school, which was vacated in October 2018, and the existing 8,225 sf sporting goods store and associated surface parking lot would be removed to accommodate the Project. The Project is anticipated to be completed by Year 2023. The Project site is located at 656 South San Vicente Boulevard in the Wilshire Community Plan area of the City of Los Angeles (City).

A total of 418 vehicular parking spaces would be provided in four above-grade parking levels with full valet operations. Additionally, up to 33 additional parking spaces, for a total of 451 spaces, could be accommodated through unstriped aisle, tandem, and other parking spaces with full valet operations within three of the four parking levels. Visitor access to the drop-off and valet area on the ground level of the parking garage would be accommodated via separate ingress and egress visitor-only driveways along the San Vicente Boulevard frontage road. Employee access to the drop-off and valet area on the second level would be provided via one employee-only driveway along Orange Street. The Project would also provide a total of 716 bicycle parking spaces on-site, including 18 short-term and 698 long-term spaces. The short-term bicycle parking spaces would be provided on the ground level; the long-term bicycle parking spaces would be provided on the rooftop level with full valet operations. The Project site plan is shown in Figure 1.

The Project would implement a transportation demand management (TDM) program to reduce single-occupancy vehicle trips and parking demand to the Project site. The TDM program would include strategies such as education and marketing to encourage employees and visitors to utilize alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, vanpool, etc.), provision of bicycle and pedestrian amenities, and support for carpools and rideshares. The Project's TDM program would be subject to review and approval by the City. The Project would also implement a parking management plan that would include strategies such as TDM measures to reduce parking demand and full attendant-operated stacked parking to increase the parking supply, as detailed above.

CODE PARKING ANALYSIS

The parking requirements of the Project were calculated by applying the applicable parking ratios from Los Angeles Municipal Code (LAMC) Section 12.21A.4.(c) for commercial uses and Section 12.21A.4.(d) for medical office uses. The LAMC parking rates detailed in Table 1 were applied to the Project and resulted in a total baseline parking requirement of 746 parking spaces. Pursuant to Section 12.32.P of the LAMC, the Project is requesting a reduction in parking not to exceed 20%, incident to a legislative action, of the required baseline City code parking requirements. Additionally, per Section 12.21.A4 of the LAMC, a non-residential building may replace up to 20% of its required vehicle parking spaces with bicycle parking at a ratio of four bicycle parking spaces to one vehicle parking space. Furthermore, for projects located within 1,500 feet of a major transit station (in the case of the Project, the future Los Angeles County Metropolitan Transportation Authority [Metro] D Line Wilshire/La Cienega Station would be located 1,500 feet west of the Project site), up to 30% of the non-residential vehicle parking may be replaced with bicycle parking. Thus, as detailed in Table 1, the total LAMC-required vehicle parking after reductions is 418 spaces. The Project parking supply of 418 striped stalls and 33 unstriped stalls would accommodate the LAMC off-street parking requirements.

PARKING DEMAND ANALYSIS

Code parking requirements are not necessarily reflective of the parking demands experienced with a development as a whole as they represent the sum of the peak parking requirements for individual land uses and do not account for the parking demand or shared parking concept (i.e., the hourly and/or day of the week variations in parking demand generated by individual land uses), nor for the synergy between uses. To provide further information, an evaluation of the potential peak parking demand pattern was prepared for the Project.

Shared Parking Methodology

The assessment of the parking demand for a mixed-use project is accomplished through the calculation of shared parking demand for the overall site, with each land use's parking demand pattern added together for each hour of the day.

As part of their national research on shared parking, the International Council of Shopping Centers (ICSC), the Urban Land Institute (ULI), and the National Parking Association (NPA) developed a database that identifies the peak parking demand for every land use typically found

within a mixed-use development. This national research database forms the basis for the assumptions in the shared parking model. *Shared Parking, 3rd Edition* (ULI, ICSC and NPA, February 2020) describes shared parking as follows:

“Shared parking is defined as parking space that can be used to serve two or more individual land uses without conflict or encroachment. The opportunity to implement shared parking is the result of two conditions:

- Variations in the peak accumulation of parked vehicles as the result of different activity patterns of adjacent or nearby land uses (by hour, by day, by season)
- Relationships among land use activities that result in people’s attraction to two or more land uses on a single auto trip to a given area or development”

Most zoning codes provide peak parking ratios for individual land uses. While this appropriately recognizes that separate land uses generate different parking demands on an individual basis, it does not reflect the fact that the combined peak parking demand, when a mixture of land uses shares the same parking supply, can be substantially less than the sum of the individual demands. For example, retail uses experience peak demand in the early to mid-afternoon, while restaurant uses experience peak demand in the lunchtime and/or evening hours (depending on the type of restaurant).

While it should be noted that the Project contains one primary land use, the medical office, a shared parking model was used to determine the parking demand rates and hourly distribution patterns of all proposed uses on-site, including the restaurant and retail/pharmacy uses.

Model Calibration Methodology

Shared Parking, 3rd Edition defines national averages to be used as parking demand rates for various land uses and it suggests ranges of assumptions regarding transit and internal capture to be used. The methodology states that the best way to measure the demand at a particular site is to use local data to modify the national averages so that it reflects local conditions. The shared parking model may be modified to use local California conditions in place of national averages when local data is available. As detailed above, a shared parking model was prepared and calibrated to the anticipated operations of the Project.

Empirical Parking Data

In accordance with *Shared Parking, 3rd Edition*, an empirical parking demand rate for the Project’s medical office use was developed based on a review of local empirical parking demand data collected at three medical office sites located in the cities of Santa Monica and Beverly Hills. The sites were selected based on their similar characteristics to the Project, including medical service type and proximity to available transit options. Parking occupancy surveys for monthly and transient parkers were conducted at the sites during typical weekdays from January to February 2020. The peak parking demand rates were calculated based on the peak number of occupied parking spaces divided by the total floor area for each site and are summarized in the Attachment.

Based on a review of the three sites, the empirical parking demand rate for the medical office located at 9090 Wilshire Boulevard was selected for use in this analysis as it is located approximately one mile west of the Project site and serviced by numerous bus lines, as well as the future Metro D Line rail transit, similar to the Project. Based on the parking occupancy surveys for the 9090 Wilshire Boulevard site, the total weekday peak parking rate is 3.43 spaces per 1,000 sf, including a peak visitor parking rate of 1.76 spaces per 1,000 sf and a peak employee parking rate of 1.67 spaces per 1,000 sf. Details of the empirical parking demand rate development is provided in the Attachment.

Model Adjustment Factors

The following discussion details the adjustment factors available for use in the shared parking model and describes the basis for the adjustment of these factors.

Time of Day. The time-of-day factor is one of the key assumptions of the shared parking model. This factor reveals the hourly parking pattern of the analyzed land use; essentially, the peak demands of the mixed-use project are calculated using these factors. The *Shared Parking, 3rd Edition* research efforts have yielded a comprehensive data set of time-of-day factors for multiple land uses. As the demand for each land use fluctuates over the course of the day, the ability to implement shared parking emerges. No time-of-day factor adjustments were made for the Project.

Weekday vs. Weekend Parking Ratio. The shared parking model measures the parking demand on a weekday as well as on a Saturday. *Shared Parking, 3rd Edition* indicates that a source for variation in parking demand can be traced to the difference between weekday and weekend demand. This variation is typically seen in the parking demand rates of the model.

The *Shared Parking, 3rd Edition* methodology requires that each land use select parking ratios; that is, the parking ratio for each land use if used independently. The base parking demand rates for visitors and employees to the medical office uses were based on the empirical parking demand rate detailed above. The base parking demand rates for the retail/pharmacy and restaurant uses were from *Shared Parking, 3rd Edition* and LAMC, respectively, were directly applied to the model. Thus, the following peak parking demand rates for weekday and weekend conditions were used in the model:

<u>Land Use</u>	<u>Unit</u>	<u>Parking Ratios (Visitor / Employee)</u>	
		Weekday	Weekend
Medical Office	spaces/1,000 sf	1.76 / 1.67	N/A ¹
Retail/Pharmacy	spaces/1,000 sf	3.00 / 0.40	3.00 / 0.40
Restaurant	spaces/1,000 sf	8.60 / 1.40	8.60 / 1.40

Seasonal Variation. Seasonal variations used in the model were derived from *Shared Parking, 3rd Edition* average rates. The shared parking analysis in this report was based on the peak

¹ Consistent with the assumptions in *Shared Parking, 3rd Edition*, no parking demand was assumed during a typical weekend for the medical office use.

month of the year. The total parking demand was compared over the course of the year and the peak month's demand is reported. No seasonal variation adjustments were made for the Project.

Mode Split. Another factor that affects the overall parking demand at a development is the number of employees and visitors that arrive by automobile compared to other means (transit, walk, shared car service, etc.) Based on the effectiveness of the Project's proposed TDM program and the surrounding transit options, including the future Metro D Line Wilshire/La Cienega Station, a 15% mode-split adjustment was applied to account for visitors and employees envisioned to walk-in from adjacent neighborhoods and commercial uses and/or take transit. The mode split adjustment also accounts for a growing number of visitors and employees who are anticipated to utilize rideshare services (e.g., Uber, Lyft, etc.) to travel to and from the Project site.

Captive Market. It is common that a mixed-use project has patrons/visitors captured by other uses within the site itself. The shared parking model accounts for the synergy of uses for a typical weekday and weekend for the Project. No further adjustments were made to the internal capture assumptions of the model.

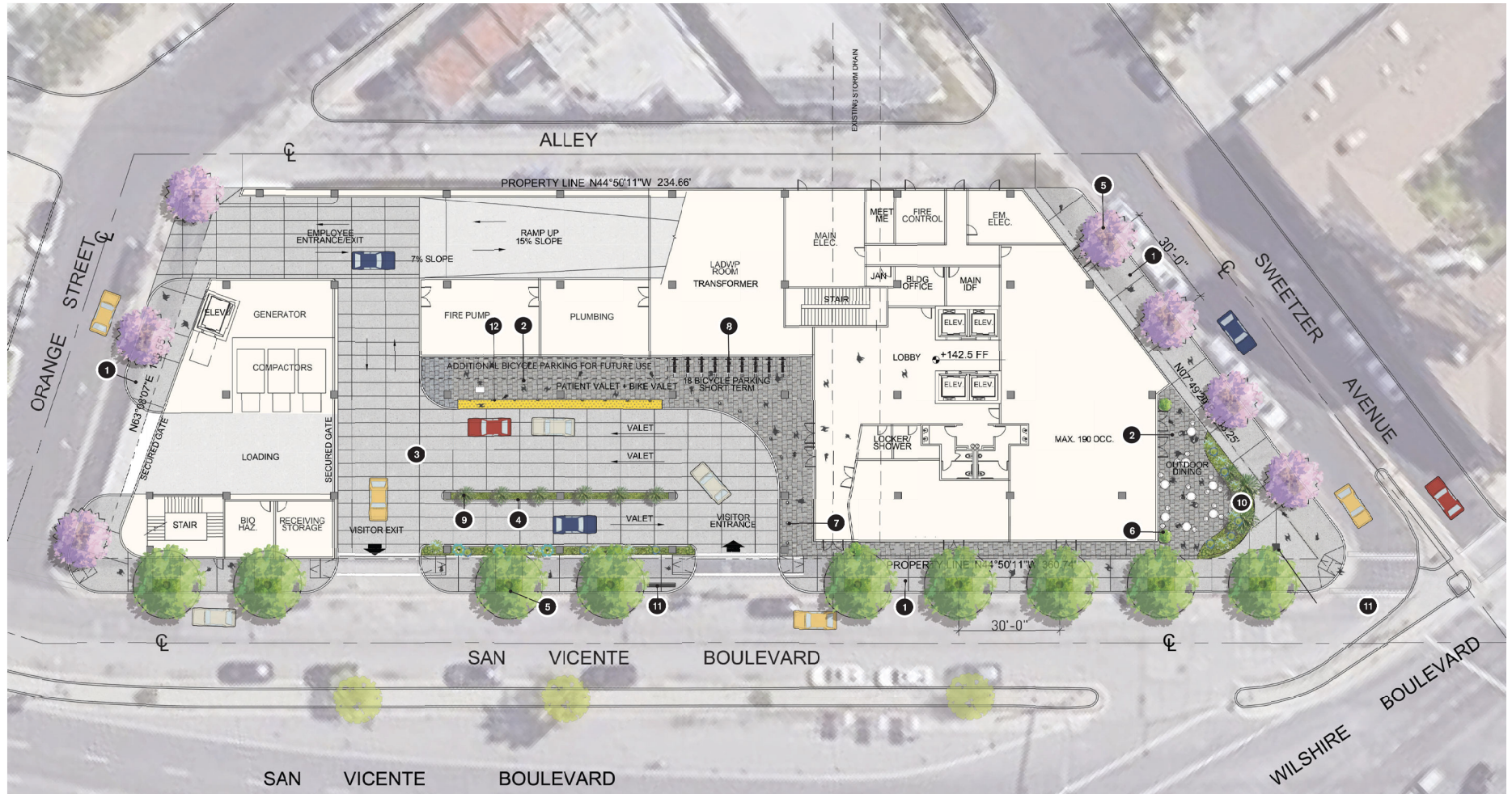
Auto Occupancy. This shared parking analysis used the *Shared Parking, 3rd Edition* national averages for automobile occupancy for all land uses. No adjustments were made to the average rates.

Parking Demand Projections

Table 1 and Figure 2 summarize the Project's combined hourly peak parking demand results for a typical weekday and weekend. Figure 3 provides a detailed hourly parking demand for each land use type during the peak weekday. As detailed, the peak parking demand is projected to occur at 11 AM and 2 PM on a weekday, with a peak demand of 422 spaces (217 visitor spaces and 205 employee spaces), and at 12 PM on a weekend, with a peak demand of 37 spaces (31 visitor spaces and six employee spaces). The Project parking supply would be able to accommodate the Project's parking demands throughout the day for both weekday and weekend conditions.

SUMMARY

As detailed above, the Project would implement a combination of TDM strategies and parking management strategies, including full-time attendant-operated stacked parking, as part of its TDM program. The peak parking demand for the Project would total approximately 422 spaces. Thus, the Project's parking supply of 451 parking spaces, including 418 parking spaces and up to 33 additional parking spaces through unstriped aisle, tandem, and other parking spaces, would be able to accommodate the anticipated peak parking demand during both the weekday and weekend.



Source: ZGF Architects. November, 2021.



PROJECT SITE PLAN

FIGURE
1

**TABLE 1
VEHICLE PARKING CODE REQUIREMENTS**

CITY CODE PARKING REQUIREMENTS [a]			
Land Use	Size	Parking Rate	Total Spaces
Medical Office Buildings	140,305 sf	5.00 sp / 1,000 sf	702
Retail Stores, General	1,000 sf	4.00 sp / 1,000 sf	4
Restaurant and Bars, General	4,000 sf	10.00 sp / 1,000 sf	40
Total Baseline Parking Requirement			746
<u>Parking Reduction per Request [b]</u>			
<i>Total Project</i>		20%	(149)
<u>Parking Reduction per Bicycle Replacement [c]</u>			
<i>Total Project (Non-Residential) - 30%</i>	716 sp	1 sp / 4 sp	(179)
Total Code Parking Requirement w/ Reductions			418
Total Parking Provided [d]			451

Notes:

[a] Parking rates per LAMC Section 12.21. A4 (c) for commercial uses and Section 12.21. A4 (d) for medical office uses.

[b] Per Section 12.32.P of the LAMC, the Project is requesting a reduction in parking not to exceed 20%, incident to a legislative action, of the required baseline City code parking requirements.

[c] Per Section 12.21.A4 of the LAMC, non-residential buildings may replace up to 20% of the required vehicle parking with bicycle parking at a ratio of four bicycle parking spaces to one vehicle parking space. Furthermore, non-residential buildings located within 1,500 feet of a major transit stop may replace up to 30% of the required vehicle parking with bicycle parking. The Project is located within 1,500 feet from the future Metro D Line Wilshire/La Cienega Station.

[d] The Project would provide a total of 451 parking spaces, including 418 parking spaces and up to 33 additional parking spaces through unstriped aisle, tandem and other parking spaces.

**TABLE 2
PARKING DEMAND SUMMARY FOR
656 S. SAN VICENTE MEDICAL OFFICE PROJECT**

Shared Parking Demand Summary																		
Peak Month: MARCH -- Peak Period: 2 PM, WEEKDAY																		
Land Use	Project Data		Weekday					Weekend					Weekday			Weekend		
			Base Ratio	Driving Adj	Non-Captive Ratio	Project Ratio	Unit For Ratio	Base Ratio	Driving Adj	Non-Captive Ratio	Project Ratio	Unit For Ratio	Peak Hr Adj 2 PM	Peak Mo Adj March	Estimated Parking Demand	Peak Hr Adj 12 PM	Peak Mo Adj May	Estimated Parking Demand
Retail																		
Retail/Pharmacy Employee	1,000	sf GLA	3.00 0.40	85% 85%	58% 100%	1.47 0.34	ksf GLA	3.00 0.40	85% 85%	99% 100%	2.52 0.34	ksf GLA	95% 100%	92% 100%	1 1	100% 100%	91% 100%	2 1
Food and Beverage																		
Restaurant Employee	4,000	sf GLA	8.60 1.40	85% 85%	22% 100%	1.59 1.19	ksf GLA	8.60 1.40	85% 85%	96% 100%	7.05 1.19	ksf GLA	90% 95%	97% 100%	6 5	100% 100%	99% 100%	29 5
Entertainment and Institutions																		
Hotel and Residential																		
Office																		
Medical Office Employee	140,305	sf GFA	1.76 1.67	85% 85%	100% 100%	1.49 1.42	ksf GFA	0.00 0.00	85% 85%	100% 100%	0.00 0.00	ksf GFA	100% 100%	100% 100%	210 199	30% 100%	100% 100%	- -
Additional Land Uses																		
													Customer/Visitor		217	Customer		31
													Employee/Resident		205	Employee/Resident		6
													Reserved		-	Reserved		-
													Total		422	Total		37

FIGURE 2
PEAK MONTH PARKING DEMAND BY HOUR (WEEKDAY/WEEKEND)
656 S. SAN VICENTE MEDICAL OFFICE PROJECT

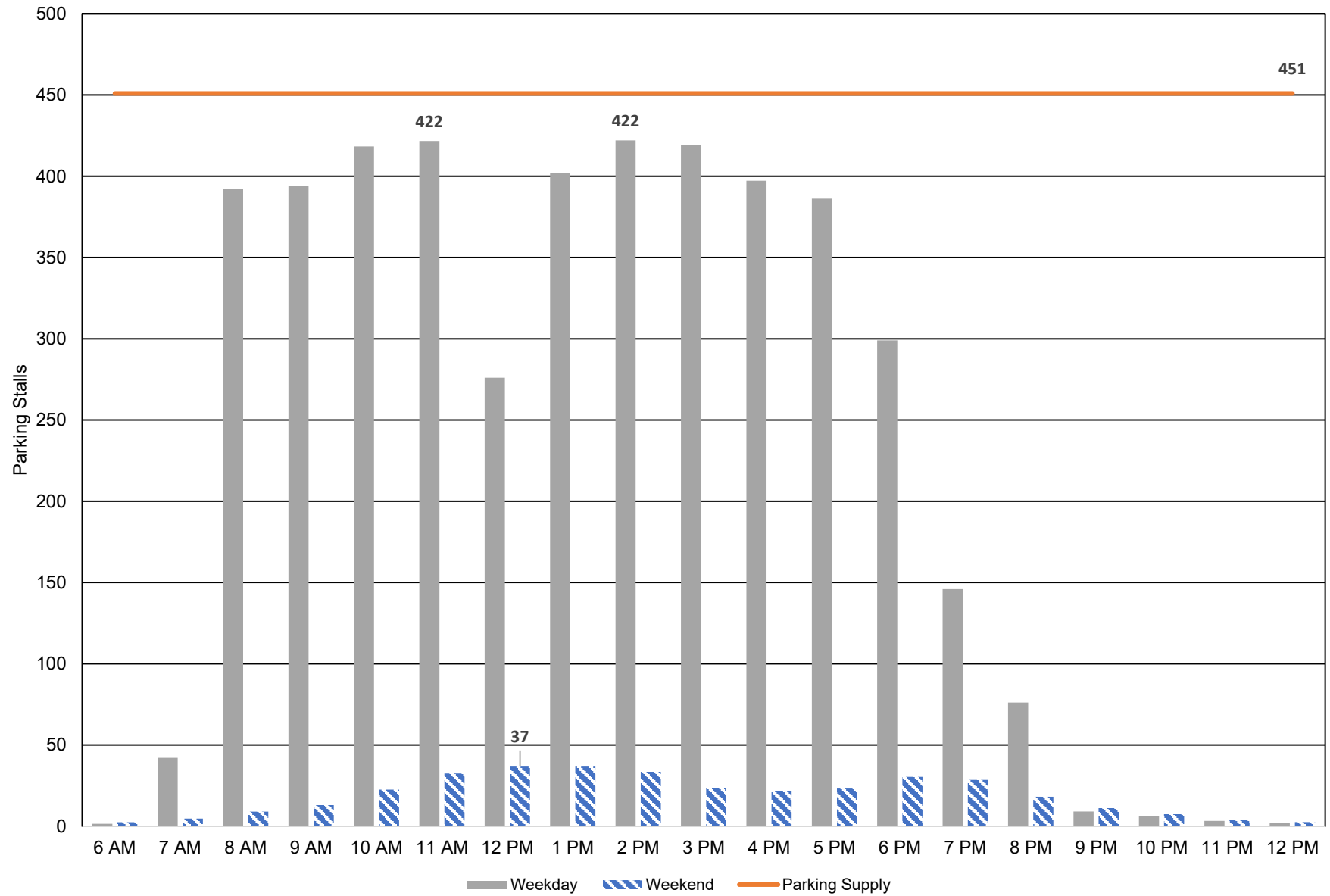
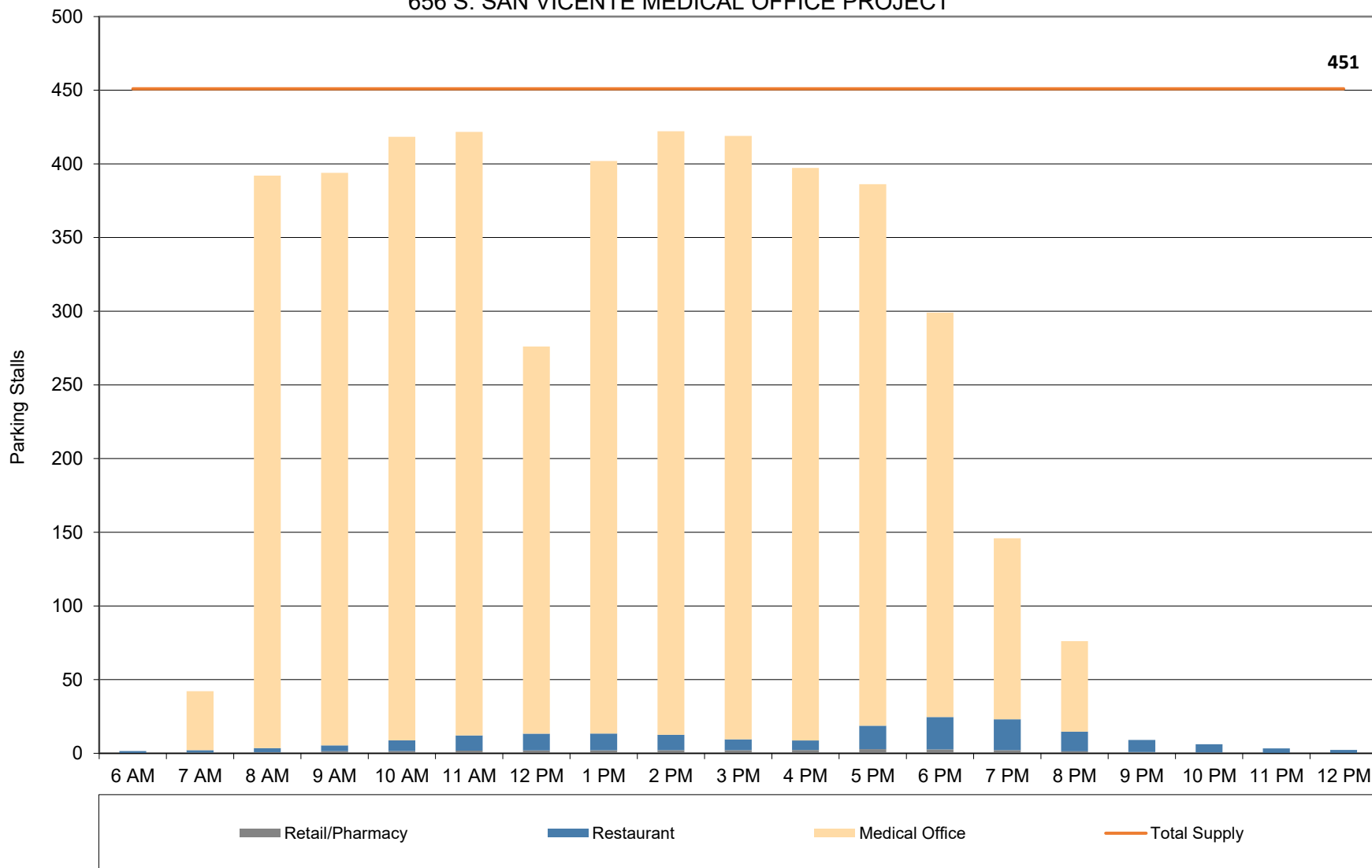


FIGURE 3
PEAK MONTH PARKING DEMAND BY HOUR BY LAND USE (WEEKDAY ONLY)
656 S. SAN VICENTE MEDICAL OFFICE PROJECT



Attachment

**ATTACHMENT
LOCAL MEDICAL OFFICE SITES
PARKING DEMAND RATE COMPARISON**

Medical Office Site	Location	Transit Availability	Floor Area (sf)	Weekday Parking Demand (sp) [a]	Peak Parking Demand Rate (sp/1,000 sf)
2811 Wilshire	Santa Monica	Yes	97,228	241	2.48
9090 Wilshire Blvd	Beverly Hills	Yes	51,570	177	3.43
2825 Santa Monica Blvd	Santa Monica	Yes	54,246	113	2.08

Notes:

[a] The parking occupancy observed at a majority of the sites was between 78-96%, which is considered fully occupied.

DRAFT

MEMORANDUM

TO: Bryan Fairbanks, Stockdale Capital Partners, LLC

FROM: Sarah M. Drobis, P.E., and Casey Le, P.E.

DATE: January 31, 2022

RE: Supplemental Parking Analysis for the
656 South San Vicente Medical Office Project
Los Angeles, California

Ref: J1534

Gibson Transportation Consulting, Inc. (GTC) was asked to provide supplemental parking analyses for the 656 South San Vicente Medical Office Project (Project) based on the incorporation of medical laboratory space into the medical office floor area (Refined Project). The parking analysis herein was prepared consistent with the methodology, assumptions, and analysis detailed in *Supplemental Parking Analysis for the 656 South San Vicente Medical Office Project, Los Angeles, California* (GTC, January 4, 2022) (Supplemental Parking Memorandum).

REFINED PROJECT DESCRIPTION

Consistent with the Project, the Refined Project proposes 140,305 square foot (sf) of medical office, consisting of 28,061 sf of medical laboratory space (approximately 20% of the total) and 112,244 sf medical office space, and approximately 5,000 sf of commercial restaurant and retail/pharmacy uses. Consistent with the Project, the Refined Project would provide a total of 418 vehicular parking spaces plus up to 33 additional parking spaces through unstriped aisle, tandem, and other parking spaces, for a total of 451 spaces, with full valet operations. No changes to the vehicular or pedestrian access are proposed under the Refined Project. In addition, the Refined Project would implement a transportation demand management (TDM) program to reduce single-occupancy vehicle trips and parking demand to the Project site and would implement a parking management plan.

PARKING DEMAND ANALYSIS

Consistent with the Supplemental Parking Memorandum, an evaluation of the potential peak parking demand pattern was prepared for the Refined Project utilizing a shared parking model. The base parking demand rates for visitors and employees of the medical office use were based on local empirical parking demand data. The base parking demand rates from *Shared Parking, 3rd Edition* (Urban Land Institute, International Council of Shopping Centers, and National Parking Association, February 2020) for the retail/pharmacy use and the Los

Angeles Municipal Code rates for medical laboratory and restaurant uses were directly applied to the model.

Consistent with the Supplemental Parking Memorandum, a mode split adjustment was also applied to the model to account for the proposed TDM program, future transit options, and rideshare services.

Parking Demand Projections

Table 1 summarizes the peak parking demand comparison between the Project and the Refined Project. Table 2 and Figure 1 summarize the Refined Project's combined hourly peak parking demand results for a typical weekday and weekend. Figure 2 provides a detailed hourly parking demand for each land use type during the peak weekday. As detailed, the peak parking demand for the Refined Project is projected to occur at 11 AM on a weekday, with a peak demand of 386 spaces (177 visitor spaces and 211 employee spaces), and at 12 PM on a weekend, with a peak demand of 37 spaces (31 visitor spaces and six employee spaces). By comparison, the incorporation of the medical laboratory space with the Refined Project results in less peak parking demand as compared to the Project. The parking supply would be able to accommodate the anticipated parking demands throughout the day for both weekday and weekend conditions.

SUMMARY

As detailed above, consistent with the Project, the Refined Project would implement a combination of TDM strategies and parking management strategies, including full-time attendant-operated stacked parking, as part of its TDM program. The peak parking demand for the Refined Project would total approximately 386 spaces, as compared to 422 spaces with the Project.

Thus, the parking supply of 451 parking spaces, including 418 parking spaces and up to 33 additional parking spaces through unstriped aisle, tandem, and other parking spaces, would be able to accommodate the anticipated peak parking demand during both the weekday and weekend.

**TABLE 1
PARKING COMPARISON SUMMARY**

Project [a]	Total Parking Provided [b]	Weekday Peak Parking Demand [c]	Surplus/Deficiency
<u>Proposed Project</u> 140,305 sf Medical-Office 5,000 sf Commercial	451	422	29
<u>Refined Project - 20% Medical Lab Space</u> 112,244 sf Medical Office 28,061 sf Medical Lab 5,000 sf Commercial	451	386	65

Notes:

[a] The Project proposes approximately 5,000 square feet (sf) of commercial space, including 4,000 sf restaurant and 1,000 sf retail/pharmacy.

[b] The Project would provide a total of 451 parking spaces, including 418 parking spaces and up to 33 additional parking spaces through unstriped aisle, tandem and other parking spaces.

[c] The peak parking demand represents the highest hour parking demand on a typical weekday. See subsequent tables and figures for the parking demand evaluation, which reflects the following assumptions:

- The peak parking demand rate for medical office (3.43 spaces per 1,000 sf) is based on local empirical parking demand data, as compared to the Code parking requirement (5.00 spaces per 1,000 sf);
- The peak parking demand rate for medical laboratory/research and development space is based on 2.0 spaces per 1,000 sf, which is consistent with the Code parking requirement;
- The parking demand analysis reflects the effectiveness of the Project's location to the future transit systems and implementation of a Transportation Demand Management program.

**TABLE 2
PARKING DEMAND SUMMARY FOR
656 S. SAN VICENTE MEDICAL OFFICE REFINED PROJECT (20% MEDICAL LAB SPACE)**

Shared Parking Demand Summary																		
Peak Month: MAY -- Peak Period: 11 AM, WEEKDAY																		
Land Use	Project Data		Weekday					Weekend					Weekday			Weekend		
			Base Ratio	Driving Adj	Non-Captive Ratio	Project Ratio	Unit For Ratio	Base Ratio	Driving Adj	Non-Captive Ratio	Project Ratio	Unit For Ratio	Peak Hr Adj	Peak Mo Adj	Estimated Parking Demand	Peak Hr Adj	Peak Mo Adj	Estimated Parking Demand
	Quantity	Unit											11 AM	May		12 PM	May	
Retail																		
Retail/Pharmacy Employee	1,000	sf GLA	3.00 0.40	85% 85%	57% 100%	1.46 0.34	ksf GLA	3.00 0.40	85% 85%	99% 100%	2.52 0.34	ksf GLA	67% 100%	91% 100%	1 1	100% 100%	91% 100%	2 1
Food and Beverage																		
Restaurant Employee	4,000	sf GLA	8.60 1.40	85% 85%	21% 100%	1.53 1.19	ksf GLA	8.60 1.40	85% 85%	96% 100%	7.05 1.19	ksf GLA	85% 100%	99% 100%	5 5	100% 100%	99% 100%	29 5
Entertainment and Institutions																		
Hotel and Residential																		
Office																		
Medical Office Employee	112,244	sf GFA	1.76 1.67	85% 85%	100% 100%	1.49 1.42	ksf GFA	0.00 0.00	85% 85%	100% 100%	0.00 0.00	ksf GFA	100% 100%	100% 100%	168 160	30% 100%	100% 100%	- -
Medical Lab Space Employee	28,061	sf GFA	0.16 1.84	85% 85%	74% 100%	0.10 1.57	ksf GFA	0.00 0.00	85% 85%	100% 100%	0.00 0.00	ksf GFA	45% 100%	100% 100%	2 44	90% 90%	100% 100%	- -
Additional Land Uses																		
													Customer/Visitor	176	Customer	31		
													Employee/Resident	210	Employee/Resident	6		
													Reserved	-	Reserved	-		
													Total	386	Total	37		

FIGURE 1
PEAK MONTH PARKING DEMAND BY HOUR (WEEKDAY/WEEKEND)
656 S. SAN VICENTE MEDICAL OFFICE REFINED PROJECT (20% MEDICAL LAB)

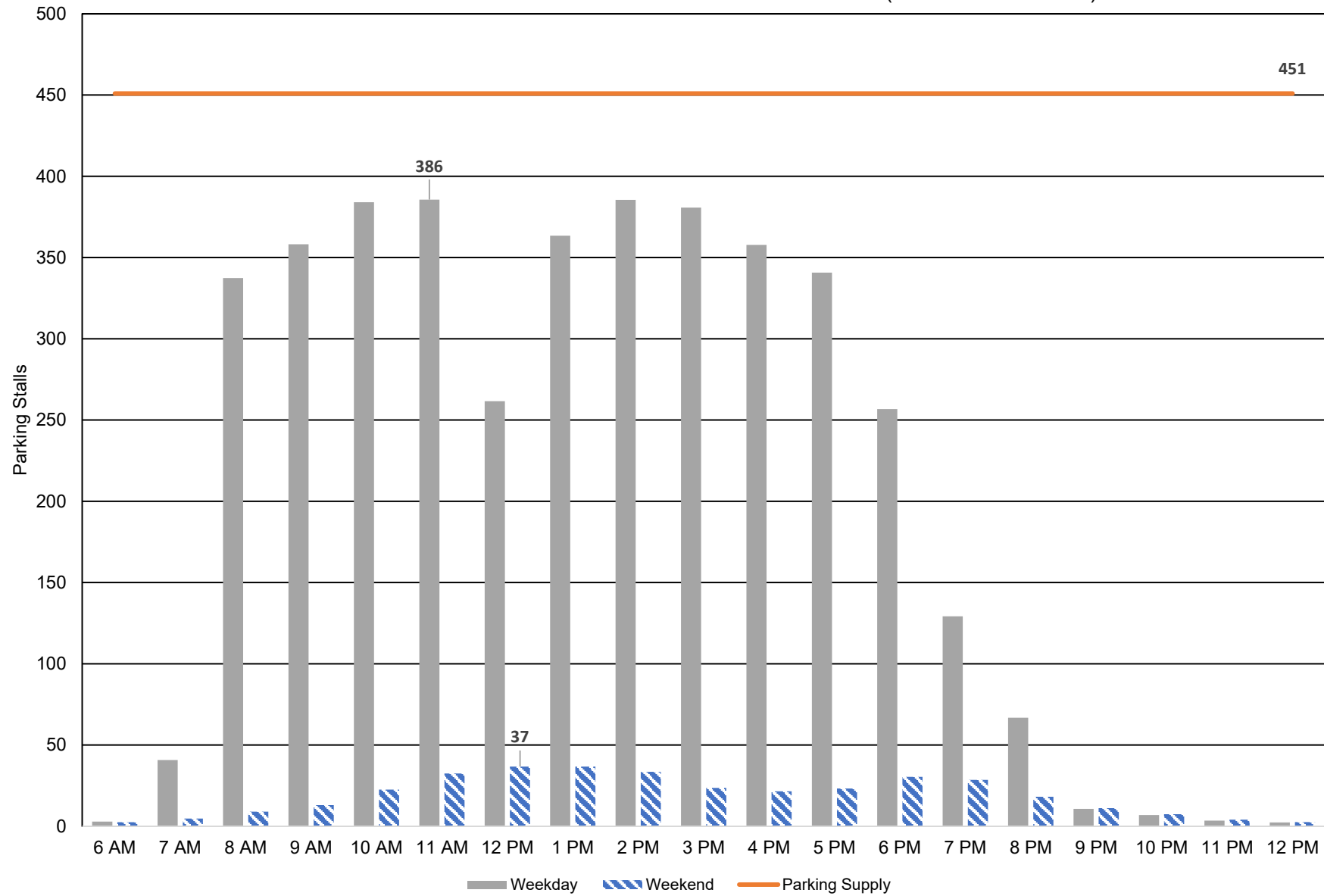
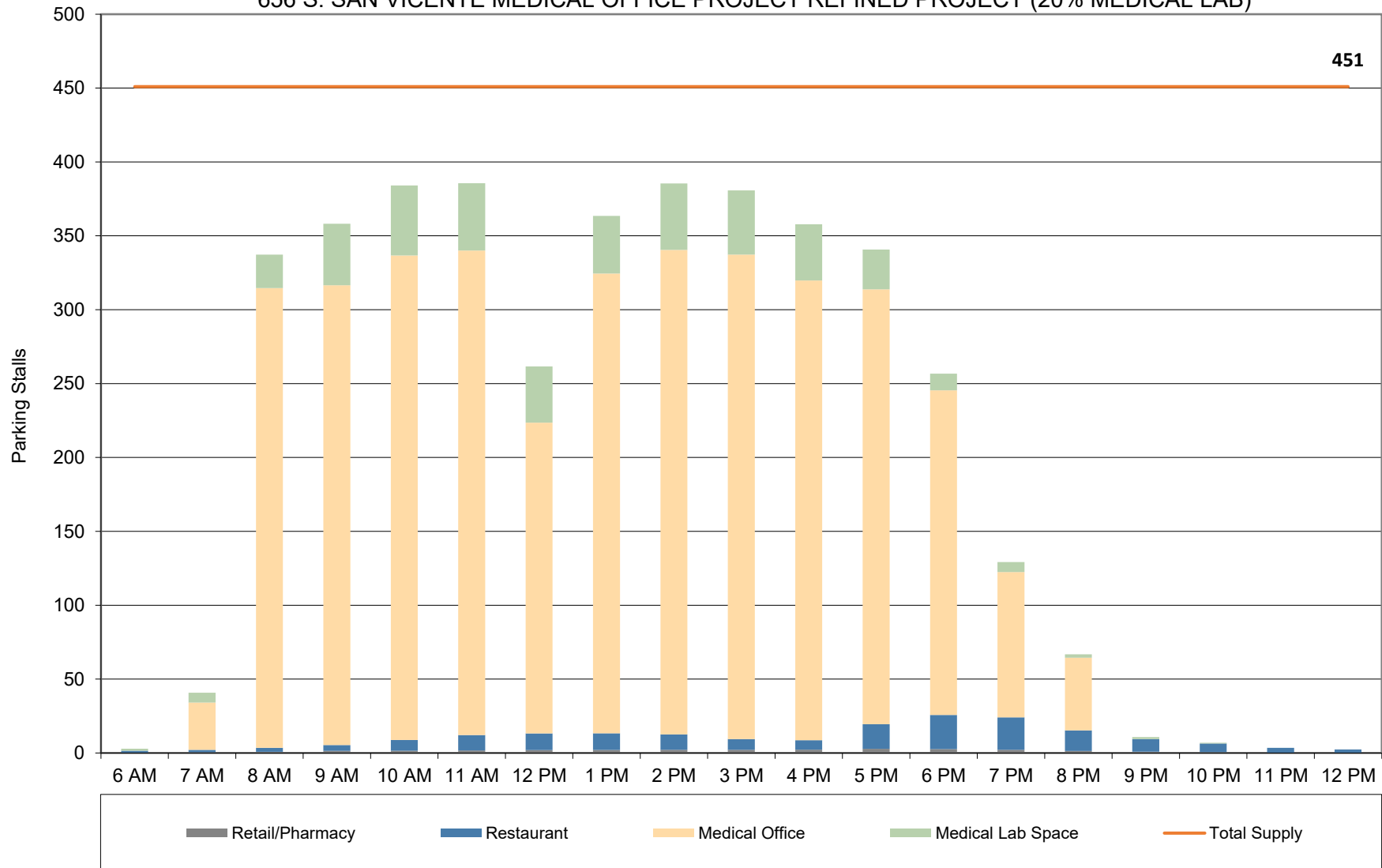


FIGURE 2
 PEAK MONTH PARKING DEMAND BY HOUR BY LAND USE (WEEKDAY ONLY)
 656 S. SAN VICENTE MEDICAL OFFICE PROJECT REFINED PROJECT (20% MEDICAL LAB)



MEMORANDUM

TO: Paul Caporaso, Los Angeles Department of City Planning – Major Projects

FROM: Sarah M. Drobis, P.E., and Casey Le, P.E.

DATE: March 22, 2022

RE: Responses to Comments for the
656 S. San Vicente Boulevard Medical Office Building Project
Los Angeles, California

Ref: J1534

Gibson Transportation Consulting, Inc. (GTC) was asked to respond to a letter by RK Engineering Group, Inc. (RK), dated February 4, 2022 regarding the transportation and parking analyses prepared by GTC for the 656 S. San Vicente Boulevard Medical Office Building Project (Project).

GTC prepared transportation and parking analyses for the Project pursuant to the California Environmental Quality Act (CEQA) and submitted the following documents to the City of Los Angeles (City): (i) *Transportation Assessment for the 656 South San Vicente Medical Office Project, Los Angeles, California* (GTC, November 2020) (GTC Transportation Assessment), which was included as Appendix J-1 of the Draft EIR, (ii) *Supplemental Parking Analysis for the 656 South San Vicente Medical Office Project, Los Angeles, California* (GTC, January 4, 2022) (GTC Parking Memo), and (iii) *Supplemental Parking Analysis for the 656 South San Vicente Medical Office Project, Los Angeles, California* (GTC, January 31, 2022) (GTC 2nd Parking Memo).

The following is a response to individual comments set forth in the RK letter.

GTC TRANSPORTATION ASSESSMENT

Comment 1

Page 4, Figure 1, Project Site Plan. A majority of the project traffic will be entering the frontage road of San Vicente Boulevard at the visitor entrance to the project. Although the project trip distribution assumed a 50/50 split between the visitor entrance/exit and the employee entrance/exit, in reality as much as 65% or more of the traffic entering the site may occur at the visitor entrance based upon the ULI (Urban Land Institute) data on Medical Office Parking demand. The project proposes to use a valet system for both visitors and employees to maximize the parking capacity of the site. There needs to be a queuing analysis to determine what will happen at the visitor/valet plus bike valet entrance to the site. This has not been quantified in the study and traffic could likely backup onto the San Vicente Boulevard frontage road and onto the adjacent streets such as Orange Street. A technical analysis of this needs to be provided to fully evaluate the ability for the valet system to work for both drop-off and pick-up conditions given the physical constraints of the site plan. Furthermore, no Valet Plan

operational analysis has been provided to determine how the system will work and to ensure it has enough capacity to handle the expanded large numbers of visitors and employees.

Response to Comment 1

As shown in the Site Plan, Figure II-3, page II-10 of Chapter II, Project Description, of the Draft EIR, the visitor entrance is located on the San Vicente Boulevard frontage road, with two entry queueing lanes, and the employee entrance is located on Orange Street with a queue lane to the second parking level. The Comment references the employee and visitor splits based on the peak parking demand ratios for the medical office use outlined in *Shared Parking, 3rd Edition* (International Council of Shopping Centers [ICSC], Urban Land Institute [ULI], and National Parking Association [NPA], February 2020) and not trip generation ratios during the commuter peak hours, which are based on the *Trip Generation Manual, 10th Edition* (Institute of Transportation Engineers [ITE], 2017). Figures 12 and 13 show the Project-related trips during the commuter morning and afternoon peak hours, which coincide with the times employees would travel to and from the Project site. Therefore, as shown, an equal distribution of employees and visitors entering and exiting the Project driveways was assumed. The number of trips generated by the Project was estimated using published rates from *Trip Generation Manual, 10th Edition* with application of allowable trip reductions per the City guidelines. The Project trip estimates, trip distribution, and trip assignment were established in coordination with and approved by the Los Angeles Department of Transportation (LADOT) through the Memorandum of Understanding (MOU) process. The Approved MOU is provided in Appendix A of the GTC Transportation Assessment.

LADOT's *Manual of Policies and Procedures* (Revised December 2020) identifies the standard reservoir length as 60 feet for 300 or more cars. The Project far surpasses this standard by having two entry lanes for visitors, each of which exceed this length, and a separate lane for employees at the second level that also far exceeds this requirement. *Manual of Policies and Procedures* also requires that a Parking Area and Driveway Plan be submitted to LADOT for approval prior to submittal of building permit plans for plan check by the City Department of Building & Safety (LADBS), to determine approval of the project's driveways and internal circulation or parking scheme. Therefore, the applicant will submit the Parking Area and Driveway Plan prior to issuance of the building permit.

Comment 2

Page 13, Existing Traffic Volumes. Peak hour and daily traffic counts were obtained on February 12, 2020. During this time when the counts were collected, there was active construction of the Metro D (Purple Line) along Wilshire Boulevard east and west of the intersection of San Vicente Boulevard at Wilshire Boulevard. Additionally, the COVID – 19 pandemic was beginning and could have affected the traffic volumes at the study area intersections including the critical intersection of San Vicente Boulevard at Wilshire Boulevard. It appears that before the Metro Line construction and the effects of the pandemic occurred, traffic volumes on San Vicente Boulevard and Wilshire Boulevard were greater than what was collected for the traffic study in 2020. RK has reviewed traffic counts collected on November 16, 2011 by LADOT at the intersection of San Vicente Boulevard at Wilshire Boulevard prior to the Metro D construction and the Covid-19 pandemic. At

that time, the entering AM peak hour traffic at the intersection was 5,979 vehicles per hour, whereas the traffic counts utilized in the traffic study from February 12, 2020, were 4,998 vehicles per hour. This indicates that the traffic during AM peak hour was nearly 20% greater in earlier years prior to the construction for the Metro D Purple line and the traffic reducing effects of the COVID – 19 pandemic which was occurring when the counts were collected in 2020. RK further obtained even earlier traffic volumes from LADOT which were not affected by construction or the Covid-19 pandemic from October 20, 2008. These counts that are included in Appendix C indicate the total AM approach volumes at the intersection were 5,674 vehicles per hour, and the PM approach volumes were 6,162 vehicles per hour. Both of these are above the levels included in the 2020 traffic assessment. A summary of the peak hour entering traffic volumes for the 2020 (Traffic Assessment Counts), 2011 and 2008 years is included in Table 1. As shown by this data, it appears that the peak hour traffic volumes collected in 2020 were affected by various events and are not representative of conditions without the construction and the pandemic. Copies of the traffic counts can be found in Appendix C.

Response to Comment 2

As set forth in the GTC Transportation Assessment, the intersection turning movement counts at the study intersections were collected in January and February 2020. The local schools were in session and the weather conditions were typical when the counts were conducted. The counts were taken prior to traffic reductions caused by COVID-19 and the Mayor's declaration of a state of emergency in March 2020. On April 17, 2020, LADOT issued *Pandemic-Related Updates to LADOT's Transportation Assessment Requirements*, which reiterated the use of traffic counts collected prior to March 1, 2020 in transportation assessments. The construction of Section 1 of the Los Angeles County Metropolitan Transportation Authority (Metro) D Line Extension on Wilshire Boulevard has a nine-year time table, with construction commenced in 2015 and substantial completion estimated in November 2023. During this time, traffic on Wilshire Boulevard was at times altered or reduced to accommodate construction. The traffic counts in 2020 were the most accurate data of the existing traffic volumes at the intersections near the Project site. The traffic counts were also compared to traffic counts collected in 2017 and it was determined that the traffic counts collected in 2020 were higher at each of the study intersections. Thus, for conservative purposes, the 2020 traffic counts were used as the basis of the non-CEQA operational evaluation of the GTC Transportation Assessment. Furthermore, the GTC Transportation Assessment provided a detailed analysis of the effects of Project-related traffic on the cumulative transportation system. The forecasted traffic volumes for cumulative conditions were developed by applying an ambient growth factor of 1% per year over three years (to anticipated buildout conditions) to the existing traffic volumes as well as applying traffic growth from the development of potential related projects in the area. The consideration of both the ambient growth factor and related project traffic overestimates the actual traffic volume growth in the area and thus provides a highly conservative cumulative condition. Therefore, the traffic volumes presented in the GTC Transportation Assessment are conservative.

Although the Metro D Line Extension is estimated to open at the same time as the Project, to provide a conservative analysis, no additional trip reductions in existing or future vehicular traffic were assumed to account for patrons that would utilize the Metro D Line. In addition, no changes to the lane configurations at the study intersections were made based on the Metro D Line. Therefore, the GTC Transportation Assessment took the most accurate assessment at the time and used a conservative analysis to estimate future trips.

Comment 3

Page 30, Table 1 (Study Intersections). It did not appear that Intersection # 4 - La Cienega Boulevard at Wilshire Boulevard which is located in the City of Beverly Hills was evaluated based upon City of Beverly Hills standards. Was there a reason this was not done at this intersection? Typically, an intersection in another jurisdiction would be evaluated by both the City of Los Angeles and City of Beverly Hills standards.

Response to Comment 3

The intersection of La Cienega Boulevard & Wilshire Boulevard is located in the City of Beverly Hills. As stated in Comment 14 below, the GTC Transportation Assessment provides a quantitative analysis of the Project's access and circulation operations, including the anticipated level of service (LOS) operations at the study intersections and anticipated traffic queues. LOS is no longer a CEQA consideration and, instead, vehicle miles traveled (VMT) analysis is required by State law under *State of California Senate Bill No. 743* (Steinberg, 2013) (SB 743). Therefore, the intersection operational analysis was provided solely for informational purposes and any identified deficiencies disclosed in the non-CEQA analysis are not intended for interpretation of a significant impact for the purposes of CEQA review. Although analysis under the City of Beverly Hills standards was not required, to provide further information, a quantitative analysis is provided herein.

On October 10, 2019, the City of Beverly Hills adopted Resolution No. 1901, which contained *Local Transportation Assessment Guidelines* as part of Exhibit B. *Local Transportation Assessment Guidelines* outlines the City of Beverly Hills methodology and thresholds for identifying transportation-related impacts pursuant to the requirements of SB 743, as well as Project-related operational effects on the local transportation system. Consistent with *Local Transportation Assessment Guidelines*, the operational analysis at the analyzed study intersections detailed in the GTC Transportation Assessment was conducted based on the Highway Capacity Manual (HCM) methodology. *Local Transportation Assessment Guidelines* also states, "when comparing existing or future baseline conditions to 'plus project' conditions, delay changes for signalized intersections that exceed the criteria below should be identified." The Project-related increase in seconds of average total delay at the intersection of La Cienega Boulevard & Wilshire Boulevard would not exceed the 10-second threshold during either the morning or afternoon peak hour. Thus, the intersection would not experience any substantial Project-related delay increases per the City of Beverly Hills' guidelines.

Comment 4

Page 40, Collaboration, Communication, and Informed Choices. The TDM strategies mentioned in this section and section 3B were only conceptual in nature. It did not go into the specifics of what was actually being proposed for the project for these strategies. They are all general in nature and do not go into any specifics that will be provided by the developer. In order to properly evaluate the percent VMT reduction, a much more detailed analysis is needed on the specific strategies that will be utilized for the program. A detailed TDM plan is necessary to make this evaluation accurate and to assume all of the vehicle trip and parking reductions in the studies.

Response to Comment 4

Traffic Demand Management Program (TDM) requirements are set forth in Los Angeles Municipal Code (LAMC) § 12.26.J. (Ord. No. 168,700, Eff. 3/31/93). For non-residential projects with greater than 25,000 square feet (sf), the LAMC provides that prior to the issuance of a building permit, the applicant shall agree to provide and maintain in a state of good repair certain applicable TDM and trip reduction measures. The applicant voluntarily provided a draft TDM Plan during the entitlement process that outlined measures, and as required, the applicant will provide a final TDM Plan prior to issuance of building permit. In addition, the City is in the process of updating the TDM Ordinance; however, the City Council has not yet adopted the revised ordinance.

(See https://planning.lacity.org/odocument/d7e3780b-3155-44a4-98cf-0fd673a6612b/TDM-FactSheet_English.pdf)

The VMT analysis for the Project was conducted using the City's VMT Calculator and adhered to the methodologies prescribed in the *City of Los Angeles VMT Calculator Documentation* (LADOT and Los Angeles Department of City Planning [LADCP], May 2020). The VMT Calculator quantifies the effectiveness of the TDM strategies based on research documented in the 2010 California Air Pollution Control Officers Association (CAPCOA) publication *Quantifying Greenhouse Gas Mitigation Measures*. As detailed in the GTC Transportation Assessment, the TDM strategies applied in the VMT analysis, and ultimately incorporated in the Project's TDM Plan, could achieve a minimum VMT reduction of 17%. With application of these TDM strategies, the VMT analysis determined that the Project's VMT impacts would be less than significant and mitigation measures would not be required. The detailed VMT analysis was reviewed and approved by LADOT via an inter-departmental memorandum to LADCP dated December 9, 2020.

Comment 5

Page 42, Los Angeles Municipal Code (LAMC) Section 12.26 J. It appears that the project is providing an excessive number of bicycle parking spaces (716 spaces) to support the reduction in VMT and automobile parking spaces. It is very questionable as to the utilization of these bicycle parking spaces for a medical office building of this type which would result in not having sufficient parking spaces for the 140,000 square feet of medical office uses. Again, credit is taken in the VMT analysis as a result of reducing the number of vehicle parking spaces by providing a huge number of bicycle parking spaces. Given the lack of substantial bicycle facilities in the area and the high volume of traffic including the impacted intersection of San Vicente Boulevard at Wilshire Boulevard it would make bicycle travel difficult. Therefore, the excessive credit for reducing vehicle traffic and parking is highly questionable.

Response to Comment 5

The 716-space bicycle parking supply is based on the Project's LAMC bicycle parking requirement and the Project's allowable vehicle parking reduction and is not based on the Project's anticipated bicycle parking demand. As set forth in the GTC Parking Memo, per LAMC § 12.21.A.4, the Project is located within 1,500 feet of the future Metro D Line Wilshire/La Cienega

Station, a major transit stop, and, therefore, may replace up to 30% of the required vehicle parking with bicycle parking at a ratio of four bicycle parking spaces per one vehicle parking space.

The City Council adopted this ordinance (Ord. No. 185,480) in 2018 to support alternative modes of transportation near transit in the future. In addition to medical office patients, the bicycle spaces would also be available for use by doctors, nurses, technicians, office staff, building staff, medical lab visitors, and restaurant and retail employee and visitors.

The VMT analysis for the Project was conducted using the VMT Calculator tool and adhering to the methodologies prescribed in *City of Los Angeles VMT Calculator Documentation*. The effectiveness of the TDM strategies within each category has been empirically demonstrated to reduce vehicle trips and VMT and is based on research documented in *Quantifying Greenhouse Gas Mitigation Measures*. As part of the bicycle infrastructure category, the implementation of bicycle parking and amenities is considered one of several TDM strategies that promotes VMT reduction. As such, the Project bicycle parking supply would result in VMT reductions.

Comment 6

Page 57, Safety Hazards, first paragraph. No traffic safety evaluation has been completed for the adjacent intersection of San Vicente Boulevard at Wilshire Boulevard in the study. This major intersection, which has skewed geometrics and a large intersection area without protected left turns on Wilshire Boulevard, needs a collision rate assessment to specifically evaluate the safety impact at this intersection since over 50 percent of the project traffic will travel through this major intersection. This assessment must review the collision history at this intersection over the past several years to develop a collision rate (collisions per million entering vehicles) in comparison to the expected state average rate for this type of intersection. Without this assessment, no conclusion can be made as to whether the project will cause a safety hazard can be made.

Response to Comment 6

As detailed in Section 3D of the GTC Transportation Assessment, based on the site plan review and design assumptions, the Project does not present any geometric design hazards related to traffic movement, mobility, or pedestrian accessibility. Further review is required for projects that propose new access points or modifications along a public right-of way. The Project adds new curb cuts along the San Vicente Boulevard frontage road and Orange Street and will close existing curb cuts and access along the San Vicente Boulevard frontage road and alley to the existing buildings on site. The Project is neither altering the existing geometry of the Project site nor the intersection of Wilshire Boulevard & San Vicente Boulevard. The Project site does not have existing access directly from Wilshire Boulevard & San Vicente Boulevard. Access from San Vicente Boulevard to the San Vicente Boulevard frontage road will not be moved or altered with the Project. In addition, there is no change in the configuration from Wilshire Boulevard to Sweetzer Avenue adjacent to the Project site on the south. Therefore, no further safety analysis is required.

Comment 7

Page 57, last paragraph. It is noted that several on-street parking meters adjacent to the project site would be removed along Orange Street and the San Vicente Boulevard frontage road to accommodate the new curb cuts for the project. How will these important metered parking spaces be made up without providing additional on-street parking being provided? Furthermore, the project proposes a substantial reduction in on-site parking has been requested which may result in more on-street parking as a result of the project. Excess parking demand from the project will overflow into the adjacent local streets and impact existing residents.

Response to Comment 7

As part of the Project, some on-street metered parking adjacent to the Project site would be removed along Orange Street and the San Vicente Boulevard frontage road to accommodate the new curb cuts. Currently, there are three metered parking spaces along Orange Street and seven metered parking spaces along the San Vicente Boulevard frontage road. Up to 10 metered spaces may be affected, although the Project would replace most of the spaces. To the extent feasible, the Project would maintain existing on-street metered parking along the Project perimeter. These parking meters primarily served the commercial uses on the Project site, including the Big 5 Sporting Goods store and the vacant commercial building. These uses will be demolished and replaced by the Project, which would fully accommodate the anticipated peak parking demand on site, as well as the parking demand throughout the day, as detailed in the GTC Parking Memo and GTC 2nd Parking Memo.

Comment 8

Page 60, first paragraph. It is generally accepted in the HCM (Highway Capacity Manual) Manual that the 95th percentile queue (design queue) should be utilized to determine storage length requirements at intersections that are analyzed using the HCM methodology. The study used the 85 percentile queue lengths for signalized intersections which underestimates the length of queues at signalized intersections. Additionally, queuing for the valet drop-off/pick-up areas need to be evaluated which has not been provided in the traffic study. Again the 95th percentile should be used for this assessment to ensure the valet drop-off/pick-up areas are properly designed and won't overflow into the adjacent streets. The valet operation and queuing need to be evaluated to determine whether the valet areas are sufficient. This needs to be determined for both the drop-off and pick-up of both visitors and employees to determine if the site plan can accommodate the arrival and departure of vehicles.

Response to Comment 8

The anticipated queues were estimated using HCM methodology in the Synchro software. To provide a conservative analysis, rather than the 50th percentile queue, or average queue, the reported queues represent the 85th percentile queue length for signalized intersections at each approach lane and 95th percentile queue length for unsignalized intersections. The 85th and 95th percentile queues measure the probability that a queue length will reach a certain length and are the maximum vehicular queue that would not be exceeded 85% or 95% of the time, respectively.

Detailed queuing analysis worksheets were provided in Appendix E of the GTC Transportation Assessment. The visitor entrance is located on the San Vicente Boulevard frontage road, with two entry queueing lanes. The visitor-valet area would provide up to three lanes for valet-service and passenger drop-off/pick-up operations on the ground floor, which allows for a pick-up/drop-off lane, a bypass lane and a valet vehicle return lane. The pick-up/drop-off area will provide adequate queue storage, as well as managed valet staff to accommodate the anticipated passenger loading demand so as to minimize any queue spillover onto public right-of-way.

The employee entrance is located on Orange Street, with a queue lane to the second parking level. Vehicular parking will be managed with full valet operations to maximize the on-site parking supply and reduce wait times during the peak hours. The Project will be required to maintain sufficient valet workers to obtain and retrieve vehicles on every level of the parking structure. The Project would also implement a parking management plan that would include strategies such as TDM measures to reduce parking demand and traffic-related effects to the surrounding street system.

As previously detailed, the operational intersection analysis detailed in the GTC Transportation Assessment is no longer considered for CEQA impact purposes under SB743. Therefore, the intersection operational analysis was provided for informational purposes and any identified deficiencies disclosed in the non-CEQA analysis are not intended for interpretation of a significant impact for the purposes of CEQA review.

Comment 9

Page 62, Project Trip Generation, third paragraph. According to the traffic study a reduction of 10% for the medical office building, 40% for the pharmacy/drugstore and 20% for the restaurants has been made to account for pass-by trips. Although the LADOT transportation analysis guidelines permit adjustments for pass-by trips, is this really appropriate for a high-rise medical office building project which is being proposed? This is not a corner shopping center that would likely attract pass-by trips which were not using the medical office building as its primary destination. The likelihood of existing traffic on the adjacent streets going to these uses is very unlikely. The result of this would increase the trip generation as shown on page 66, Table 7 (Project Trip Generation). This could also affect the assumptions for pass-by trips for the other uses of the building.

Response to Comment 9

The GTC Transportation Assessment uses the *Trip Generation Manual, 10th Edition* methodology to estimate Project trip generation. As stated, the analysis takes an adjustment, as permitted by LADOT's *Transportation Assessment Guidelines* (July 2020) (TAG), for pass-by trips for each use, which are Project trips made by drivers passing on an adjacent roadway and stopping by on the way from an origin to another destination. These adjustments were approved in consultation with LADOT during the MOU process. Consistent with Attachment H: Pass-By Trip Rates of the TAG, which are based on rates published by ITE, these include a reduction of 10% for medical office use, 40% for pharmacy/retail use, and 20% for restaurant use. These estimates were based on likely scenarios and typical traffic patterns and are reasonable. The Project is located in a

highly urbanized and commercial area with other nearby office uses, commercial retail uses, and grocery stores, and it is likely that a visitor would make multiple stops in the area.

Comment 10

Page 64, Figure 12, (Project Trip Distribution). This figure indicates the project trip distribution to the adjoining intersections and roadways. It is critical to note that over 50% of the project traffic will travel through the intersection of San Vicente Boulevard at Wilshire Boulevard (Intersection # 5). That is a significant amount of additional traffic traveling through this intersection which has been shown to be failing at a LOS (Level of Service) of F for existing/future conditions for both AM and PM conditions. The location and access restrictions of the site force a majority of the project's traffic to travel through this highly congested intersection. Additionally, the intersection of Sweetzer Avenue (intersection # 9) accommodates a substantial amount of inbound and outbound project traffic. This local street intersection will be substantially impacted as a result of the project traffic.

Response to Comment 10

See Response to Comment 14 below regarding LOS analysis of study intersections.

Comment 11

Page 66, Table 7 (Project Trip Generation). As noted in Comment # 10, the project's net new trips have been reduced substantially in comparison to the typical trip generation rates identified by the ITE (Institute of Transportation Engineers) for the project. For example, during the AM peak hour, the ITE trip rates indicate a total of 427 vehicles per hour (two-way) would be generated; however, through a series of substantial reductions, the trips analyzed in the traffic study were reduced to only 304 vehicles per hour (two-way). This is a total reduction of nearly 30%. During the PM peak hour, the ITE trip generation rates would indicate a total of 533 vehicles per hour (two-way) generated, whereas, the applied reductions reduce the number of trips to 382 vehicles per hour (two-way). This results in a reduction of nearly 30% which would normally be expected to occur. While it's appropriate to provide some reduction to account for the possible transit/walk-in adjustment, and the reduction from the operating sports goods superstore the other reductions seem to be excessive. The result of these reductions has lessened the impacts of the project on the study area intersections.

Response to Comment 11

The GTC Transportation Assessment uses the published trip generation rates from *Trip Generation Manual, 10th Edition* to estimate Project peak hour trip generation. These rates are based on surveys of similar land uses at sites around the country and are provided as both daily rates and morning and afternoon peak hour rates. They relate the number of vehicle trips traveling to and from a project site to the size of development of each land use. Per ITE's *Trip Generation Handbook, 3rd Edition* (2017), the surveys were generally collected at "low-density, single-use,

homogeneous, general urban or suburban developments with little or no public transit service and little or no convenient pedestrian access.” The trip generation rates that were applied to the Project are based on a general urban/suburban area type, and, thus, the trip reductions were applied to account for a number of various factors, including public transit usage, trips shared between different users in the Project, and pass-by trips for each use. Each of these is permitted by the TAG and justified by the location of the Project site, the proximity to a new Metro station, the types of uses, and the surrounding urban area with nearby pedestrian destinations. Each of these reductions was also approved in consultation with LADOT during the MOU process. Although the existing school was vacated around October 2018, in order to provide a conservative transportation analysis, existing use credits were not assumed related to the removal of the school.

Comment 12

Page 73, Intersecting Queuing Analysis. The queue length for signalized intersections should be based upon the design queue which is the 95th percentile queue length. A summary of the queuing required for both the intersections and the valet area needs to be included in the traffic study.

Response to Comment 12

See Response to Comment 8 regarding the reported queue and operational analysis at the study intersections.

As previously detailed, the operational analysis at the intersections detailed in the GTC Transportation Assessment is no longer a CEQA consideration and, instead, VMT analysis is required by State law under SB 743. Therefore, the intersection operational analysis was provided for informational purposes and any identified deficiencies disclosed in the non-CEQA analysis are not intended for interpretation of a significant impact for the purposes of CEQA review.

Comment 13

Page 73, Recommended Actions, last paragraph. The TDM program is very general, and no project specific items have been identified in the TDM concept plan. A much more detailed TDM plan with the specific description and evaluation of the techniques to be provided by the project needs to be provided to justify any significant reductions in VMT traffic and parking impacts as a result of the project.

Response to Comment 13

See Response to Comment 4 regarding the Project’s TDM Plan.

As stated in the GTC Transportation Assessment, the TDM Plan would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, aimed at encouraging use of alternative transportation modes. At places with comprehensive programs, including both

economic incentives and support services, the programs resulted in an average 24% reduction in commuter vehicles. As detailed in Appendix D of the GTC Transportation Assessment, the VMT Calculator estimates that the TDM measures selected as part of the Project VMT evaluation, including reduced vehicle parking, promotions and marketing, and bicycle parking, would result in VMT and trip reductions. Additional measures that would be implemented by the Project as part of the TDM Plan would further reduce the number of single-occupancy vehicle trips to the site. In addition to the TDM Plan, the Project will explore opportunities to manage site access and circulation operations as well as provide road safety enhancements for pedestrian, bicycle, and transit users.

Comment 14

Pages 77 and 78, Tables 8 and 9. As shown in this evaluation, even with the reduced trip generation for the project, the intersection of San Vicente Boulevard at Wilshire Boulevard (Intersection # 5) will be operating at a poor LOS F during both the AM and PM peak hours for existing with project and future with project conditions. This critical intersection is directly adjacent to the project, and as previously noted, over 50% of the project traffic will travel through this intersection. The traffic study identifies no improvements to this intersection whatsoever, even though over 50% of the project traffic is projected to travel through the intersection in congested conditions. Additional improvements, whether they be physical or operational, need to be provided to accept the additional traffic from this project, or the project needs to be reduced to lessen the impacts of the project. Even with the greatly reduced trip generation assumed in the study for the project during the AM peak hour, the future delay at the intersection will increase from 41.7 to 53.6 seconds per vehicle and operate at an LOS F. That is an 11.9 second per vehicle increase, or at least 59,476 seconds (nearly 1,000 minutes) of delay during the peak hour. This is based upon the lower traffic counts that occurred in February 2020. Based upon the previous operating conditions at this intersection, the delays would be increased by an additional 20%. Although LOS is no longer a CEQA consideration, it is a quality-of-life consideration for the community. Some reduction in project traffic along with improvements to the intersection and including operational changes are necessary to improve this intersection that is substantially impacted by the project.

Response to Comment 14

The GTC Transportation Assessment provides a quantitative analysis of the Project's access and circulation operations, including the anticipated LOS operations at the study intersections and anticipated traffic queues based on the HCM methodologies. Based on observations of existing intersection operations, it is recognized that the HCM methodology for individual intersections along major Arterial Streets does not in every case account for vehicular queues, pedestrian conflicts, etc. Thus, the calculated average operating conditions may appear better than is observed. As such, the LOS results for San Vicente Boulevard & Wilshire Boulevard (Intersection #5) presented in Tables 8 and 9 reflect the observed conditions and provide a worst-case analysis. This intersection currently operates at LOS F and is anticipated to continue to operate at LOS F during the morning and evening peak hours.

As stated, LOS is no longer a CEQA consideration and, instead, VMT analysis is required by State law under SB 743. A goal of the law was to help California combat climate change by reducing greenhouse gas emissions related to transportation. SB 743 fundamentally changed

how traffic impacts are measured under the State's updated CEQA Guidelines. SB 743 required that cities replace the prior traffic impact metric, LOS, with a new metric, VMT, by July 1, 2020. The degree of LOS impacts was based on how long a vehicle was delayed at an intersection and evaluated the inconvenience to the driver. It showed higher impacts in more dense urban areas and favored suburban sprawl with less density spread over a greater area.

The degree of VMT impacts is based on the distance traveled from home to work and evaluates the impact to the environment. Locating housing, shopping, recreation, and jobs near one another decreases vehicle trip lengths, and increases walkability, ride-share and trip-chain opportunities, all of which generate lower VMT and reduce greenhouse gases, air quality impacts, and traffic impacts. Similarly, infill development sited within a dense, walkable, multi-use, urban environment will typically result in lower VMT. Furthermore, CEQA Guidelines Section 15064.3(b)(1) states that "generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact." VMT can be mitigated or reduced through TDM strategies that reduce total miles driven, not by more traditional mitigation such as road widening, traffic lights, and turn lanes. As detailed in the GTC Transportation Assessment, which was reviewed and approved by LADOT via an inter-departmental memorandum to LADCP dated December 9, 2020, the Project VMT impacts were determined to be less than significant and mitigation measures would not be required.

The GTC Transportation Assessment provides an LOS operational analysis for informational purposes and any identified deficiencies disclosed are not intended for interpretation of a significant impact for the purposes of CEQA review.

Comment 15

Page 81, Residential Street Segment Analysis, paragraph two. Based upon the assumptions in the traffic analysis, the project will add an additional 309 new project daily vehicle trips to Orange Street which exceed the 175 daily trip thresholds as identified by the City transportation assessment requirements. The study recommends that a TDM program to promote non-automobile travel and reduce the use of single occupant vehicle trips is necessary along with some form of neighborhood improvements and traffic calming measures. No specific commitments have been defined in the TDM concept plan or the neighborhood improvements and traffic calming measures to indicate that any reduction in traffic impacts which have been identified that exceed the city standards. As previously noted, traffic generated from the project has been reduced substantially already as a result of the assumed TDM program. However, the benefits of these programs have not been fully addressed. Further specific improvements including reduction of the size of the project, and specific design features are needed to reduce the identified deficiencies along Orange Street between Sweetzer Avenue and La Jolla Avenue.

Response to Comment 15

The purpose of the residential street segment analysis is to determine the potential increases in average daily traffic volumes on Local Streets. The GTC Transportation Assessment estimates 309 new Project daily trips that may use Orange Street. This is a conservative number and does not account for credit for the existing on-site uses including the Big 5 Sporting Goods store or the

prior educational facility. Project traffic is not anticipated to add a substantial amount of traffic to any other adjacent residential streets as they do not provide direct access to the Project Site and use of those segments would require multiple turns to and from surrounding adjacent Arterial Streets. The Project would implement a TDM Plan to reduce single-occupant vehicle trips and Project traffic throughout the immediate area. Additionally, as discussed in the GTC Transportation Assessment, the Project would contribute toward neighborhood improvements and traffic calming measures as part of a Neighborhood Traffic Management Plan (NTMP). The goals of the NTMP would be to minimize neighborhood traffic intrusion and potential loss of on-street parking. The applicant voluntarily provided a draft TDM Plan during the entitlement process that outlined measures and, as required, the applicant will provide a final TDM Plan prior to issuance of building permit. The draft TDM Plan included TDM and parking management strategies to reduce vehicular traffic on the adjacent roadway system, particularly during the most congested periods of the day, by promoting non-automobile travel and ride-sharing. The TDM Plan may continue to develop over time as the Project matures, and the TDM measures identified may change based on future needs and technologies.

Comment 16

Page 82, Construction Evaluation Criteria. There needs to be more detailed assessment of the construction impacts of the project, especially with respect to the temporary loss of access and parking in the local neighborhoods. Where will workers and delivery trucks park when there is construction within the entire site? No specifics have been identified to determine if this is even possible and if off-site parking facilities are used, where are they to be located and how will they function? Answers to these questions are necessary before the project can be fully evaluated and considered. There are no details on how this will be accomplished in the Traffic Assessment.

Response to Comment 16

An evaluation of the potential temporary loss of access and parking during the Project construction period is detailed in Section 4F of the GTC Transportation Assessment. As detailed therein, portions of the adjacent roadways have been identified for potential utilization during the construction period. However, two-way travel would be maintained around the perimeter of the Project site to minimize any detour of traffic to adjacent developments. Furthermore, a detailed Construction Management Plan (CMP) will be prepared and submitted to the City for review and approval prior to issuance of building permit. The CMP will restrict workers from parking in the public right-of-way in the vicinity of (or adjacent to) the Project site and will provide an off-site location for worker parking. The location of the off-site parking will depend on when construction commences and what lots are available at the time. In addition, the hours of construction typically require workers to be on site before the weekday morning commuter peak hour period and to leave prior to the weekday afternoon peak hour period. The Project would be required to implement a construction management plan as well as a construction worker parking plan. (Refer to Project Design Feature TRAF-PDF-2 and TRAF-DF-3 of Section IV.1, Transportation, of the Draft EIR.) A full analysis will be included in the CMP.

Comment 17

Page 83 Proposed Construction Schedule. In the City of Los Angeles, the normal truck haul activity times are typically limited to 9 AM to 3 PM. The applicant is requesting that these be extended to 7 AM to 3 PM on weekdays and 8 AM to 4 PM on Saturdays. It has already been demonstrated that the traffic counts for weekdays during the AM peak hour are at least 20% underestimated based upon previous counts at the intersection of San Vicente Boulevard at Wilshire Boulevard. Furthermore, the intersection is currently operating at a very congested LOS during the AM and PM peak hour conditions. As a result of this, no change in construction activity should be permitted at requested earlier times.

Response to Comment 17

The haul route hours will be determined through a haul route application. LAMC requirements require that the hours of operation be Monday through Friday 9am to 3:30pm and Saturdays from 7am to 4pm with no hauling on Sundays or holidays. However, LAMC § 41.40 permits construction and demolition between 7am and 9pm on weekdays and 8am and 6pm on Saturdays, as set forth in the LADOT Good Neighbor Construction Practices. The recommended haul route is north on San Vicente Boulevard, east on 6th Street, south on Fairfax Avenue, and east on Washington Boulevard to the eastbound I-10. For empty truck routes, the recommended route is west on I-10 to the La Brea Avenue exit, north on La Brea Avenue, and north on San Vicente Boulevard to the Project site. This will minimally affect the nearby residential neighborhoods on the loaded truck route only.

Comment 18

Pages 84 to 85, Excavation Phase Trip Generation and Building Construction Phase. As previously noted, there is major concern for parking during the construction. There will be anywhere from 20 to 100 workers per day during the construction, along with numerous materials delivery trucks and other construction activity. There is no room on the adjacent streets to accommodate an additional 100 parked cars as a result of the construction activities. The project must provide off-street parking for these construction activities. There has to be a detailed plan on how these vehicles will be parked so that they will not impact this surrounding existing residential community. As previously noted, several existing parking spaces on the adjacent streets will be removed and no specific plan has been developed to address where construction workers, deliveries and other activities will be accommodated. This needs to be determined because of the impacts which would impact the local neighborhoods. There needs to be a detailed parking plan provided for the construction process before any project can be considered for approval.

Response to Comment 18

As detailed in Section 4F of the GTC Transportation Assessment, during construction, adequate parking for construction workers will be secured on site or leased from nearby off-site parking areas. Shuttle service would be provided for construction workers who park in off-site parking

areas. Restrictions against workers parking in the public right-of-way in the vicinity (or adjacent to) the Project site would be identified as part of the CMP). There would be a detailed parking plan provided for the construction process prior to issuance of building permits, as required in the CMP and per Project Design Feature TRAF-PDF-2 and TRAF-DF-3 of Section IV.1, Transportation, of the Draft EIR.

Comment 19

Page 86, Access. It is mentioned that there will be closures and temporary traffic controls in the area. What specific street closures are planned, and how will the local/collector streets be affected by the construction of the site? The assessment of the construction impacts is being pushed off to some future Construction Management Plan, however, the impacts need to be determined and a specific plan developed now to accommodate the construction at this point in time. The Construction Management Plan mentioned on page 87 is generic and does not deal with the specific conditions at the site and the surrounding neighborhoods in a highly urbanized developed area. At least a preliminary construction management plan is necessary dealing with the specific street road closures and parking requirements that are needed during construction. Supplemental Parking Analysis for the 656 S. San Vicente Boulevard Medical Office Project.

Response to Comment 19

As stated in the Section 4F of the GTC Transportation Assessment, a detailed Construction Management Plan (CMP) that includes street closure information, a detour plan, haul routes, and a staging plan will be prepared and submitted to the City for review and approval prior to issuance of a building permit. The CMP measures will be based on the approved project design and the nature and timing of specific construction activities, as well as other projects in the vicinity of the Project site. As part of the approval process, LADOT will review the CMP in relation to other construction projects in the area (e.g., the Metro D Line Extension) in order to coordinate any street closures and detours to the extent feasible.

GTC PARKING MEMO AND GTC 2ND PARKING MEMO

Page 1, Valet Operations. It appears the project will provide full valet service for both visitors and employees. There has been no analysis to evaluate how this will be accomplished at both the San Vicente Boulevard frontage road and Orange Street driveways. The traffic analysis indicated that one-half the traffic will enter each of these entries during the peak hours. Since this will include both the new traffic generated by the project and "pass-by" traffic which will use the two driveways. This would result in a minimum of 276 vehicles per hour entering and 87 vehicles per hour leaving the two driveways during the AM peak hour and a minimum of 136 vehicles per hour entering the two driveways and 311 vehicles per hour leaving the two driveways during the PM peak hour. These large volumes of entering and exiting vehicles need to be processed by the valet service. No analysis has been provided to see if this can be done without totally overwhelming the valet operations, backing traffic up onto the San Vicente Boulevard frontage road/Orange Street, and creating traffic jams with the parking garage and the valet areas. It should be recognized that

these demand numbers are based upon the significantly reduced vehicular trip generation with the generous transit/walk-in adjustments to the normally anticipated traffic for this type of use. The entire valet system needs to be fully evaluated to ensure it can accommodate this large of a building with the expected inbound and outbound traffic demand. This would include both the valet parking for the visitors, employees and those persons who may come by bicycle.

Response to Comment 20

The Project will include two queuing aisles on the ground level for visitors and one aisle that extends up the ramp to the second parking level for building employees. *Manual of Policies and Procedures* identifies the standard reservoir length as 60 feet for 300 or more cars. The Project far exceeds this by have two entry lanes for visitors, each of which exceed this length, and a separate lane for employees at the second level that also far exceeds this requirement. *Manual of Policies and Procedures* also requires that a parking area and driveway plan be submitted to LADOT for approval prior to submit of building permit plans for plan check by LADBS to determine approval of the Project's driveways and internal circulation or parking scheme. Vehicular parking will be managed with full valet operations to maximize the on-site parking supply and reduce wait times during the peak hours. The Project will be required to maintain sufficient valet workers to obtain and retrieve vehicles on every level of the parking structure. The full time valet parking also serves the long term bicycle parking. Short term bicycle parking is available on the ground level and accessible by the public. As set forth in the GTC Parking Memo and GTC 2nd Parking Memo, the highest peak parking demand would occur at 11am or 2pm on weekdays, outside of the typical commuter peak periods. During the times of high volume, the building will employ sufficient valet workers to obtain and retrieve vehicles and bicycles, as required by LADOT.

Comment 21

Page 2, Bicycle Parking. The project is proposing to provide 716 total bicycle parking spaces in lieu of additional vehicle parking spaces. Realistically some employees may ride bicycles to work, but certainly not the number that they have anticipated. Most medical office visitors/patients will not be riding their bicycles for appointments to visit the site and most likely will be driving their own vehicles or using some form of Ride-Share Services. Again, these forms of transportation will add to the problems that are anticipated to occur at the valet stations discussed in Comment # 21 and to the traffic and parking problems that have been previously mentioned.

Response to Comment 21

See Response to Comment 5 above regarding the allowable vehicle parking reductions for the Project related to the proximity of a major transit stop and LAMC bicycle parking requirements. As discussed in Response to Comment 5, the 716 bicycle parking spaces are required by the LAMC and are not based on a bicycle parking demand study.

The operational analysis was based on the anticipated vehicle trips to the Project site, which were calculated based on trip rates published in *Trip Generation Manual, 10th Edition*. These rates were determined by surveys of similar land uses at sites around the country. The surveys and trip rates account for all vehicle trip types to a site, including deliveries, maintenance, transportation

network companies or TNCs (i.e., rideshare, Uber, Lyft, etc.), etc. As previously discussed, reductions to the Project trip generation estimates were made to account for non-automobile trips (e.g., bike, walk, transit).

Comment 22

Page 2, Requested Reduction in Code Parking. The Developer is requesting a reduction of between 39.5% to 44.0% from code parking based upon the striped parking spaces and the striped/unstriped spaces. This is an excessive reduction in required parking for a project of this size and use. This is a major concern, since the surrounding streets cannot accommodate overflow parking from the project since the majority of the local streets require Permit Parking for residents in the area. Where will the overflow parking be accommodated in this area which is in very short supply of any on-street parking spaces?

Response to Comment 22

The applicant is requesting a 20% reduction in parking as permitted through the Zone Change application process (LAMC § 12.32). The Project includes a total of 418 vehicular parking spaces within the four above-grade parking levels. As set forth in the GTC Parking Memo and GTC 2nd Parking Memo, up to 33 additional parking spaces, for a total of 451 spaces, could be accommodated through unstriped aisle, tandem, and other parking spaces with full valet operations. For a Project that includes 140,305 sf of medical office use, 4,000 sf of restaurant use, and 1,000 sf of retail/pharmacy use, parking demand projections show peak parking demand would occur at 11am and 2pm on a weekday, with a peak demand of 422 spaces (217 visitor spaces and 205 employee spaces). The Project parking supply would be able to accommodate the peak demand with valet using 418 vehicular parking spaces and four aisle/non-striped spaces. If the Project replaces 20% of the medical office space (28,061 sf) with medical lab space, the peak parking demand reduces to 386 spaces (177 visitor spaces and 211 employee spaces) and the Project parking supply would be able to accommodate the peak demand with valet within the 418 parking spaces. Both Project scenarios can be fully parked on site with full valet without requiring overflow parking off site.

Comment 23

Page 2, Shared Parking Methodology. The ULI (Urban Land Institute) Shared Parking Methodology is an appropriate tool to evaluate parking demand for a Mixed-Use project. However, several of the assumptions used in the evaluation are questionable and lead to unrealistic lower parking demand volumes. These items are further discussed in the next set of comments. Page 2, Empirical Parking Data. Parking demand surveys were taken at three (3) different medical office buildings during January to February of 2020. The highest rate of 3.43 spaces per 1,000 square feet was used in the shared parking analysis from a building located in Beverly Hills. The Covid-19 Pandemic was just starting to occur at that time which led many people to postpone normal visits to medical office buildings. Furthermore, the tenant occupancy levels have not been determined at the study sites. This will have an impact on the parking ratio calculation. While RK does agree that the City's parking rate of 5.0 spaces per 1,000 square feet may be high, a reduction in the rate by 31.4% is excessive. The ULI Shared Parking 3rd Edition use a parking

rate of 4.6 spaces per 1,000 square feet (3.0 spaces per 1,000 square feet for visitors and 1.6 spaces per 1,000 square feet for employees) for medical office buildings. Furthermore, the ITE recommends a rate of 4.59 spaces (total) per 1,000 square feet (85th% rate) which is substantially greater than the base parking demand rates used in the shared parking analysis. A more realistic base parking demand rates needs to be used in the study to determine the appropriate amount of parking that would be required, or the size of the building needs to be adjusted accordingly.

Response to Comment 23

The Mayor of Los Angeles issued the first state of emergency for COVID-19 on March 4, 2020. Parking occupancy surveys were conducted at the sites during typical weekdays from January to February 2020, prior to the COVID-19 pandemic conditions. During the months of January and February 2020, there was no documented reduction in traffic or parking due to COVID-19 in the City.

(See http://clkrep.lacity.org/online/docs/2020/20-0291_reso_03-04-2020.pdf).

As stated in the GTC Parking Memo, ICSC, ULI, and NPA developed a database that identifies the peak parking demand for every land use typically found within a mixed-use development. This national research database forms the basis for the assumptions in the shared parking model in *Shared Parking, 3rd Edition*, which defines national averages to be used as parking demand rates for various land uses and suggests ranges of assumptions regarding transit and internal capture to be used. However, the methodology states that the best way to measure the demand at a particular site is to use local data to modify the national averages so that it reflects local conditions. The shared parking model may be modified to use local California conditions in place of national averages when local data is available. As set forth in the GTC Parking Memo, the shared parking model was prepared and calibrated to the anticipated operations of the Project. The GTC Parking Memo identified three medical office uses in the vicinity and selected the medical office located at 9090 Wilshire Boulevard because it was located approximately one mile west of the Project and serviced by various bus lines and the future Metro D Line, similar to the Project. This provided the most similar condition to evaluate the visitor parking rates. As stated in the GTC Parking Memo, the parking occupancy observed at the three sites was between 78-96%. In addition, the 9090 Wilshire Blvd building had the highest peak parking demand rate of 3.43 per 1,000 sf and, therefore, provided the most conservative analysis. Taking an average of the three medical office building would have resulted in a lower peak parking demand rate. It is not more appropriate to use the national ULI rate or the ITE rate referenced in the comment, because, as stated in *Shared Parking, 3rd Edition*, it is more accurate to rely on local conditions through survey.

Comment 24

Page 3, Weekday vs. Weekend Parking Ratio and Table 2 (Parking Demand Summary). As noted in Comment # 25, a more realistic base parking rate needs to be utilized in the shared parking analysis for the medical office land uses. Furthermore, the split used for Visitors/Employees (1.76 / 1.67 spaces per 1,000 square feet) is not realistic and is inconsistent with the ULI data which shows a much larger proportion of visitors to employees. The shared parking analysis also assumed an additional 15% reduction for driving adjustment which further reduces the parking demand. A reduction should not be applied to the empirical parking rates since it already accounts

for the effects of non-driving visitors and employees in the project area. The parking rates used for the Retail/Pharmacy need to total 4.0 spaces per 1,000 square feet, and also follow the ULI split between Visitors/Employees. The result of these adjustments will increase the adjusted parking demand from 422 spaces to a much greater need for on-site parking spaces. Consideration to reducing the building size based upon the amount of parking should be given.

While not as critical in determining the peak parking demand for the project, the weekend parking demand needs to consider some use of the medical office facilities during that time period. Typically, a parking demand rate for the medical office of 10% of the weekday rate should be reasonable to be utilized. Again, parking in the local area is critical. There has to be sufficient on-site parking, since there is no excess street parking in the area because of the time restrictions and Parking Permit requirements on most of the nearby streets, and the construction of the project itself will eliminate several on-street metered spaces.

Response to Comment 24

See Response to Comment 25 regarding peak parking demand rates. The split between medical office visitors and employees (1.76/1.67) is accurate based on the empirical data collected at 9090 Wilshire Boulevard, which identified employee and visitor counts during the peak hour. Additional reductions were applied to account for visitors and employees envisioned to walk in from adjacent neighborhoods and commercial uses or take transit based on the effectiveness of the TDM program availability of future transit and alternative transportation options. The driving adjustment also accounts for a growing number of visitors and employees who are anticipated to utilize rideshare. The parking rates for retail/pharmacy are based on parking demand rates for pharmacy uses from *Shared Parking, 3rd Edition* and not LAMC-required spaces. The weekend parking analysis assumes that the medical office spaces would not have weekend hours, which is consistent with assumptions in *Shared Parking, 3rd Edition*. Even if some medical offices did have employees on the weekend, the peak hour demand study shows that medical office use has more than 10 times the peak hour rates during weekdays, so the parking would be designed based on the peak hour rate during the weekday. The Project will utilize shared parking to serve multiple users at the Project site. Vehicular parking will be managed with full valet operations to maximize the on-site parking supply and reduce wait times during the peak hours.

Comment 25

Attachment – Local Medical Office Sites Parking Demand Rate Comparison. As noted in Comment # 24, the empirical parking demand surveys were done in January – February 2020 at the beginning of the Covid-19 Pandemic which would lower the expected parking demand because many people were postponing typical medical service needs. Furthermore, there is no information on whether the surveyed sites were fully occupied at the time of the surveys. This would affect the empirical data plus an adjustment for building occupancy needs to be considered in coming up with any parking demand rates. As previously noted, the parking counts were most likely affected by the Covid-19 Pandemic.

A “Refined Plan” has been suggested in the Supplemental Parking Analysis dated January 31, 2022 that would propose that 28,061 square feet of the total 140,305 square foot medical offices would be for labs. The revised parking analysis used a parking rate of 2.0 spaces per 1,000 square

feet would be used for the lab uses. That is a parking rate for medical lab facilities in educational facilities, not where patients go for blood work or other laboratory testing. Those uses require much more parking similar to a true medical office. Therefore, the revised parking analysis would significantly underestimate the true parking demand for those use.

Response to Comment 25

The Mayor of Los Angeles issued the first state of emergency for COVID-19 on March 4, 2020. During the months of January and February 2020, there was no documented reduction in traffic or parking due to COVID-19 in the City.

(See http://clkrep.lacity.org/online/docs/2020/20-0291_reso_03-04-2020.pdf)

The peak parking demand rate for medical laboratory/research and development space is based on 2.0 spaces per 1,000 sf, which is consistent with the LAMC § 12.21.A.4 parking requirement.

Comment 26

In conclusion, the parking calculations for the project have significantly underestimated the true parking demand and the planned parking capacity will result in an overflow of parking into the neighboring areas. The proposed TDM includes a policy to require "Paid" Parking which will further result in both visitors and employees trying to park in other areas, including the local neighborhoods which do not have excess parking capacity. The project needs to be reduced in scope to accommodate the true expected parking demand for the project.

Response to Comment 26

As set forth above, the GTC Parking Memo and GTC 2nd Parking Memo fully analyzed the required parking for the Project and determined the Project will not require off-site parking. The final TDM Plan will include specific provisions to discourage employees and visitors of the Project from parking off-site and in the surrounding residential neighborhood.