Communication from Public

Name:	Sheri Bonstelle
Date Submitted:	10/16/2022 05:46 PM
Council File No:	22-0922
Comments for Public Posting:	Dear President O'Farrell and Members of the Los Angeles City Council: Our firm represents 650 - 676 SSV Property Owner, LLC and 650 SSV Property Owner, LLC, the owners and the Applicant for the medical office project located at 650-656 S. San Vicente Boulevard. Please see the attached letter submitted on behalf of the Applicant.

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October 14, 2022

BY EMAIL

Members of the Los Angeles City Council
200 N. Spring Street Room 240
Los Angeles, CA 90012
Attn: City Clerk
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 28, 2022 (Continued from October 11, 2022, Items 14, 15, 16)

Dear President O'Farrell and Members of the Los Angeles City Council:

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. The Planning and Land Use Management Committee ("PLUM") voted unanimously to recommend approval of the Project on October 4, 2022. This letter responds to the letter submitted by Jamie Hall at Channel Law Group to the City of Los Angeles ("City"), dated September 3, 2022 and submitted October 3, 2022. ("Hall Letter") The Hall Letter attempts to claim discrepancies in the design in an effort to illegally delay the approval of the Project; however, each of the claims has no merit and has already been thoroughly evaluated in the Advisory Agency Letter of Determination, Planning Commission Letter of Determination and Draft and Final EIR.

1. ***The City properly calculated the parking for the Project***. The Hall Letter claims that the City improperly calculated the Project parking, because the City should have calculated the allowable bicycle replacement on the original code-required parking and then taken the 20 percent reduction allowed pursuant to a zone change. This would have resulted in the same automobile parking requirements, but greater bicycle parking requirements. However, this is contrary to the provisions of the Los Angeles Municipal Code ("LAMC").

As set forth in the Draft EIR and Final EIR, pursuant to the LAMC, 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)

LAMC Section 12.24.A.4 permits that any non-residential building within 1,500 square feet of a major Transit Stop "*may replace up to 30 percent of the required automobile parking spaces with bicycle parking*" at a ratio of four bicycle parking spaces for one automobile parking space (4:1). This is a by-right provision of the code and does not require discretionary action by the City; it may also be requested anytime during entitlements, building permitting or after construction of the project.

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*." As part of the Project, the Applicant requested a 20 reduction in the requirements; The legislative approval would change the required automobile parking spaces for the Project to 597 automobile parking spaces. (746 x .8 = 597)

Therefore, after the City Council approves the zone change with the 20 percent parking reduction, the Applicant may replace up to 30 percent of the required 597 spaces with bicycle spaces in a ministerial action. This would allow up to 179 automobile spaces to be replaced with 716 bicycle spaces. There is no reason that the ministerial bicycle replacement must be taken on the original code parking requirement, because the City Council legislative action changed the parking required for the project and therefore changed the maximum bicycle replacement allowed. If the bicycle replacement had been done first, then the 20 percent legislative reduction would have been taken on both the bicycle spaces and automobile spaces and arrived at the same bicycle and automobile parking as the Project. The required bicycle parking spaces may be included in the replacement bicycle parking provided, if the replacement bicycle parking exceeds the otherwise required bicycle parking. (LAMC § 12.21.A.4, 16)

2. ***The Project parking plan complies with the LAMC provisions.*** The Hall Letter claims that the Project parking fails to comply with the City's Parking Design bulletin for tandem spaces, fails to provide spacing and aisle widths from structural columns, and does not provide spacing in front of mechanical lifts. However, it identifies only two spaces on a floor that it argues do not fully comply, and even if it were true, there is sufficient area to relocate these spaces. It also claims that use of unstriped aisle spaces violates the LAMC. These claims have no merit.

First, the Applicant has submitted design development level drawings for planning entitlement review. The plans do not include structural engineering drawings, and do not include final structural design and column spacing. The plans are not construction drawings, and will still need to undergo engineering design prior to plan check review by the Department of Building and

Safety ("LADBS"). During plan check, LADBS will confirm that the parking layout meets all of the spacing and design requirements set forth in the LAMC and the City's Parking Design bulletin. The planning entitlement review will identify the required number of parking spaces, and the Project will provide them, as required by the approval.

Second, the City's Parking Design bulletin is an informational bulletin issued by City staff as in not part of the LAMC or adopted through legislative action. The Parking Design bulletin, dated June 28, 2021, provides design standards for parking layouts, including mechanical stackers. Whether or not the City approves the specific parking layout is solely a question for LADBS, who can require redesign or issue a modification if necessary. Here, the Hall Letter identifies only two spaces on the southeast corner of the lot that it claims are not consistent with the Parking Design standards. However, there is an area for additional parking spaces available on the northwest corner, and so two spaces may be easily relocated if necessary.

Third, when tandem parking is provided, the Parking Design bulleting requires: "*parking area shall be capable of accommodating required onsite queuing spaces for the shuffling of cars. The queuing spaces shall be arranged so to that the required driveway access aisle is not reduce to less than 10' wide. Each of the queuing spaces shall be minimum 8' wide and 18' long*." (p. 26) Therefore, the 33 unstriped spaces in the aisle not only comply with LAMC, but are required to allow maneuvering of tandem and/or mechanical lift spaces. Therefore, the Hall Letter does not identify any parking design deficiencies that violate the LAMC, and the Project fully complies with the LAMC parking requirements.

3. ***The long-term bicycle parking complies with the LAMC requirements***. As required by LAMC 12.21.A.16(d), the Project includes long-term bicycle parking accessed by valet on the roof in an enclosed space. The Project also includes the required shower and workspace areas. Therefore, the Hall Letter's claim that the bicycle parking is open to the air and does not comply with LAMC has no merit.

4. ***The Project fully complies with all loading space standards.*** The Hall Letter claims that the Project loading zone violates LAMC standards (LAMC § 12.21.A.6(a)) because it is accessed off of Orange Street, a local street, and not off of the adjacent alley. However, the loading zone fully complies with LAMC standards. As stated in the Hall Letter, LAMC Section 12.26.B authorizes the LADBS to waive or modify loading space requirements "*when such space cannot reasonably be provided or utilized*." The LADOT review letter stated that the loading space would be accessible from Orange Street because "*geometric constraints prevent the adjacent alley from being used for truck access*." The adjacent alley is 20 feet wide, with an existing multi-family housing building adjacent to the alley on the North side without any setbacks. Existing unit windows and parking spaces are accessed directly from the alley. In addition, there is an existing utility easement and overhead electrical lines that run along the south side of the alley. Therefore, there is not sufficient area for a truck to maneuver in the narrow alley to access a loading dock from the alley. This condition was fully analyzed by LADOT in making

their determination that the loading dock could not be reasonably utilized from the alley and should be located off of Orange Street.

5. ***The Project fully complies with all Fire Department regulations, including for parking and helicopter landing***. First, the Hall Letter claims that the Project does not comply with LAFD Requirement No. 74, which requires each platform of a mechanical stacker to be directly accessible to a main, access or side aisle, because it identified two parking spaces adjacent to stackers. These parking spaces may be easily relocated or designed to comply with the LAFD requirement; therefore, the Project complies. In addition, the parking design is reviewed by LADBS, and not the planning department, as stated above.

The Hall Letter also claims that the City was required to provide an Emergency Helicopter Landing Facility ("EHLF") on top of the structure, per LAFD Requirement No. 10. This is false. In September 2014, the City Council announced a change to a half-century old fire code that required all tall buildings in the City of Los Angeles to be topped by helicopter landing pads. Established in 1958, the Los Angeles Fire Department's "Requirement No. 10" for helipads atop buildings more than 75 feet tall was meant to allow airlifts in the event of a fire, attack or other emergency. Fire Department officials said the rules were adopted in 1974 in reaction to a devastating blaze in Brazil, where many victims fled to the roof and waved frantically at helicopters that were initially unable to land. But with new technology and design, the restriction became outdated, and the City officials stated that there had only been one rooftop rescue in recent decades - a 1988 evacuation from the 62-story First Interstate Bank building. (See "*Without mandatory helipads, L.A. skyline can take off*," by Emily Alpert Reyes, LA Times, September 29, 2014.) Under the revised policy, certain new buildings are exempt from the helipad requirement and the buildings instead need to have stairways, elevators, automatic sprinkler systems and video cameras that ensure safety, access and escape routes for firefighters and building occupants during emergencies. In Requirement No. 10, Option 1, paragraph 2, a building between 120 and 240 feet in height is exempt if it provides certain features including fire service access elevators, stairways with roof access, enclosed elevator lobbies, and automatic shutters for all non-access stairs. The Project fully complies with these requirements.

6. ***The Project provides the required street and sidewalk dedications and properly calculates allowed floor area***. The Hall Letter claims that the Project does not provide the required street dedications for San Vicente, because it is designated as a Boulevard II, which requires a 55 foot half width right of way; the letter states that a service road does not require additional dedication, but must provide sidewalk dimension in compliance with street standards. (LAMC § 12.37.A.6) Here, the Project does provide the required sidewalk, and does not require any additional dedication for a 55 foot half width right of way on San Vicente Boulevard, because it is located on the San Vicente service road. As stated in the Draft EIR, Transportation IV.I-28, the Project provides the required dedications. The Letter from the Bureau of Engineering ("BOE"), dated April 4, 2022, (See Exhibit 1) specifically requires that the Project provide the following dedications:

"6. That a 2.5-foot wide strip of land be dedicated along Orange Street to complete a 30-foot half right-of-way in accordance with Local Street standards, including a 15-foot by 15-foot property line cut corner or 20-foot radius property line return at the intersection with San Vicente Boulevard.

7. That a 3-foot wide strip of land be dedicated along Sweetzer Avenue to complete a 33-foot half right-of-way in accordance with Collector Street standards, including a 15-foot by 15-foot property line cut corner or 20-foot radius property line return at the intersection with San Vicente Boulevard."

DOT has the sole authority to require and approve required dedications, and the Project complies with the requirements of the DOT letter. The total FAR allowable will be calculated based on the final lot area after any dedication; therefore, the Project will not exceed the allowable FAR.

7. ***The Project's employee driveway fully complies with the LAMC.*** The Hall Letter claims that the Project's employee driveway may not be located adjacent to an alley per LAMC § 62.105.1, because the alley requires a 20' radius curve which would conflict with the proposed exit width. However, the Project can accommodate the width of the employee exit and the curb, as shown on the Project drawings that identify the curb radius at the alley. The Hall Letter claims that the employee exit cannot be moved slightly to accommodate the required separation, because there is not 20 feet of total curb on Orange street as required by LAMC § 62.105.3. This is not correct. The Project does have substantially more than 20 feet of curb on Orange Street, as shown in the Project plans.

8. ***The City approved the required entitlements for the Project, and the Project does not require a Major Development Project CUP***. The Hall Letter states that the Project requires a Conditional Use Permit ("CUP") for a Major Development Project, and identifies projects where the Applicant applied for both a zone change and a CUP for a Major Development Project. This is false.

Pursuant to LAMC § 12.24.U.14, a CUP is required for a Major Development Project for various projects including "*100,000 square feet or more of floor area in other nonresidential or non-warehouse uses in the C2, C4, C5, CM, M1, M2 and M3 Zones*." (Ord. No. 180,174, Eff. 10/5/08). The code identifies specific exemptions to the CUP requirement in LAMC § 12.24.U.14(c), which states "*Notwithstanding any provisions of this article to the contrary, any development project which received one or more still-valid discretionary approvals, including but not limited to those listed below, shall be exempt from the conditional use requirement set forth in this subdivision: (i)zone change; (ii)height district change; . . . (vii)tentative tract map; . . . (xv) other similar discretionary approvals, as determined by the Director*." In this case, the Project includes a request for a zone change, height district change, VTTM and other discretionary actions that were reviewed by the City Planning Commission, Advisory Agency and City Council.

In addition, the code specifically states: "*This exemption shall apply only if the applicable decision-making body determines in writing that the prior discretionary approval, and the required environmental review, considered significant aspects of the approved project's design (such as, but not limited to, building location, height, density, use, parking access) and that the existing environmental documentation under the California Environmental Quality Act is adequate for the issuance of the present permit in light of the conditions specified in Section 21166 of the California Public Resources Code*." (LAMC§ 12.24.U.14) Here, the Project includes the City's certification of the Draft and Final EIR, which reviewed the land use of the Project, including building location, height, density, use and parking access, and the Draft and Final EIR fully complied with CEQA. Therefore, the Project qualified for the exemption to the requirement for a CUP for a Major Development Project. The fact that other projects requested zone changes and CUPs for a Major Development Project is not relevant; The other projects may have had specific reasons, such as needing the CUP in the event that the City denied the zone change request.

9. ***The City provides the required findings for the Site Plan Review approval***. The Hall Letter makes a general claim that the City failed to provide the required findings for the Site Plan Review approval. As set forth in the City Planning Commission Staff Report, the Planning Commission Letter of Determination ("LOD"), and Draft and Final EIR, the City fully complied with providing the Site Plan Review findings. The Hall Letter claims that the Site Plan Review approval lacks substantial evidence because the sidewalks are not wide enough, there is inadequate loading space, there is inadequate parking, and the Applicant failed to do a queuing analysis. However, each of these claims is refuted in this letter and in the LOD, and Draft and Final EIR. In addition, the Applicant conducted two separate parking analysis by Gibson Transportation Corporation, dated January 4, 2022 and January 31. 2022. In addition, the GTC Response to Comments, dated March 22, 2022, summarized the queuing analysis provided in Appendix E of the GTC Transportation Assessment. (See Exhibit 2) The queuing analysis concluded that the Project would not cause any overflow onto San Vicente by fully staffing the valet during peak hours.

10. ***The City provides the required findings for the VTTM approval.*** The Hall Letter makes a general claim that the City failed to provide the required findings for the VTTM approval. As set forth in the Advisory Agency Letter of Determination, City Planning Commission Staff Report and Letter of Determination, and Draft and Final EIR, the City fully complied with a Site Plan Review findings. The Hall Letter specifically claims that the Project fails to comply with adopted street standards and did not request a waiver per LAMC § 17.05.D. However, the Project does comply with the requirements set forth in the BOE letter, dated April 4, 2022, and does not require a waiver of street standards, and so has not requested one.

11. ***The Project's zoning, including the (D) limitation, comply with the LAMC.*** The Hall Letter claims that the (D) limitation that limits the floor area to an FAR of 4.5:1 violates the LAMC because the Project does not provide the required street dedications. As set forth above, the Project does provide the dedications identified in the BOE letter, dated April 4, 2022. In addition, the (D) limitation provides a limit on the floor area based on a ratio of the lot

area, as approved by DOT. Therefore, the Project's (D) limitation will remain at an FAR of 4.5:1 regardless of the final determination of the lot area after dedication.

12. ***The Project's Draft and Final EIR fully comply with CEQA, including Project Description, Land Use, Transportation Analysis, and Fire Department Response Analysis.***

(a) ***Project Description.*** The Hall Letter claims that the Project fails to provide an adequate Project Description for evaluation under CEQA, because it (i) fails to provide required street dedications, (ii) fails to comply with the loading zone requirements, (iii) fails to provide the required EHLP, and (iv) fails to identify specific measures for the Neighborhood Traffic Management Program ("NTMP"). The first three claims are refuted in detail in this letter, because the Project provides the LADOT required street dedications; the loading zone is properly located on Orange street; and, there is no EHLP required if the Project complies with the LAFD Requirement 10 provisions. As set forth in the Draft and Final EIR, Transportation, the Project does not have a significant impact on transportation, and so no mitigation is required. The Draft EIR identifies potential methods to reduce traffic in the immediate neighborhood, as set forth in Condition No. 16, including speed humps, barriers or striping. This condition allows the neighbors the ability to request specific measures that they prefer for their neighborhood, and provides $100,000 of funding to pay for these costs. The Condition does not require any specific measures that would not be supported by the immediate neighborhood. These measures are not required under CEQA, because the traffic analysis did not identify significant impacts that require mitigation measures. The NTMP funding is not illusory, because the funds must be provided to the City. The funds are only returned to the Applicant if the neighbors elect not to request any specific measures, because the City is not authorized to use the funds for other uses.

(b) ***Land Use.*** The Hall Letter claims that the Draft EIR is insufficient because it fails to fully describe the zone change from C1 to C2, and focuses on the height district change from Height District 1 to Height District 2. The Hall Letter claims that the Draft EIR did not evaluate the difference in yard requirements between C1 and C2. This is false. The Draft EIR fully evaluated that the Project was changing from a C1-1VL-O zone in a Limited Commercial land use designation to a C2-2(D)-O zone in a Regional Center Commercial land use designation. The Draft EIR fully evaluated whether, under CEQA Guidelines Appendix G, the Project would have a significant impact related to land use and planning if it would (a) physically divide an established community; or (b) cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Draft EIR, Land Use, IV.F-15) The Draft EIR evaluated any inconsistencies between the Project and the applicable general plans, specific plans, and regional plans, among other analysis. (CEQA Guidelines § 15125(d)) The Draft EIR determined that the Project, including the zone change and General Plan amendment which was identical to that of the adjacent block, did not cause a significant impact on the environment. The Draft EIR was not required to evaluate whether the Project was consistent with the existing zoning under CEQA.

(c) ***Storm Drain.*** The Hall Letter claims that the Project fails to evaluate construction impacts from relocating the existing storm drain, and then purports to cite to e-mail correspondence with City staff regarding the storm drain early in the entitlement process. Pursuant to the BOE Letter and multiple conversations with BOE staff, the City agreed that the storm drain may remain in place, and that the Project may be constructed over the storm drain with certain design restrictions. As set forth in the BOE Letter, dated April 4, 2022, which was provided to the Appellants, BOE agrees: "*There are existing storm drain facilities within the easements that traverse the tract area. The project proposes to construct over the public storm drain easement and drain system. It will be necessary for the subdivider to complete the procedures to construct over or adjacent to these easements*." This BOE Letter was referenced in the Advisory Agency approval of the VTTM, and specifically identified the storm drain in the conditions of approval. Therefore, the storm drain is not being relocated and was fully evaluated and approved in its existing location.

(d) ***Transportation.*** The Hall Letter claims that transportation analysis in the Draft EIR was insufficient, and references the letter from RK Engineering Group Inc., dated February 22, 2022, ("RK Letter") which was submitted to the City prior to approval of the VTTM by the Advisory Agency. Each of the claims were refuted in a detailed letter by JMBM to the City Planning Commission, dated June 13, 2022, and in the findings adopted by the VTTM Letter of Determination and Planning Commission Letter of Determination for the Project.

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. 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 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.

(e) ***Fire Department Response.*** The Hall Letter claims that the Project has inadequate fire emergency response. This statement is false. (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.

In summary, the Hall Letter provides no new information or identifies no new potential significant impacts that were not fully analyzed in the Project findings, conditions, Advisory Agency and Planning Commission Letters of Determination, and Draft and Final EIR. We respectfully request that the City Council approve the requested Project entitlements and environmental review.

Very truly yours,

Sheri Bonstelle

SHERI L. BONSTELLE for
Jeffer Mangels Butler & Mitchell LLP

SLB
Exhibit 1 - Letter from the Bureau of Engineering, dated April 4, 2022
Exhibit 2 – Letter from Gibson Transportation, 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)
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Craig Bullock, CD13 Planning Deputy (Craig.Bullock@lacity.org)

EXHIBIT 1

CITY OF LOS ANGELES
INTERDEPARTMENTAL CORRESPONDENCE

Date: April 4, 2022 **REVISED**

To: Mr. Vincent P. Bertoni, Director
Department of City Planning
Attention: Deputy Advisory Agency

From: Bertram Moklebust, Principal Civil Engineer
Permit Caser Management Division
Bureau of Engineering

Subject: Vesting Tentative Tract Map No. 74865 **- REVISED**

Transmitted is a print of vesting tentative map of Tract Map No. 74865 stamp-dated December 8, 2021, located at 650-676 San Vicente Boulevard in Council District No. 5.

This report supersedes any previous report from City Engineer.

This map has been filed for merger and re-subdivision into one lot for the proposed construction of a 12-story mixed use building with ground floor commercial.

There are existing storm drain facilities within the easements that traverse the tract area. The project proposes to construct over the public storm drain easement and drain system. It will be necessary for the subdivider to complete the procedures to construct over or adjacent to these easements.

Email communications dated March 14, 2022 from the Los Angeles Department of Sanitation Clean Water Conveyance Division (LASAN) stated that demolition as well as construction in and around this line would be a problem due to the age of the line as well as possible structural loading on the storm drain line which is not allowed.

There are existing sewers available in the streets adjoining the subdivision. The construction of house connection sewers will be required to serve the tract. This tract will connect to the public sewer system and will not result in violation of the California Water Code. I therefore recommend that you make the necessary determination.

In the event you approve the vesting tentative map of Tract No.

74865 then please include the engineering standard conditions issued by your department and the following special conditions:

1. The applicant shall submit building plans, structural plans, necessary mitigation measures including any other requirements by the Los Angeles Department of Sanitation Clean Water Conveyance Division, Bureau of Engineering Central District Structure Group and Clean Water Division-Storm Water Group for review and approval to construct over the existing public storm drain easement and drainage system within the subdivision.

   A letter from each of the above stated department shall be submitted to the City Engineer clearing this condition prior to the issuance of any building permit and recordation of the final map. In the event construction over the existing storm drain easement is not approved, a revised map shall be submitted showing no proposed structures within or over the existing storm drain easement.

2. That satisfactory arrangements be made with Los Angeles Department of Sanitation Clean Water Conveyance Division, Bureau of Engineering Central District Structure Group and Clean Water Division-Storm Water Group to protect, maintain the existing public storm drain easement and that any additional onsite easement areas, alignment or realignment be provided to their satisfaction prior to the issuance of any building permit and recordation of final map.

   A letter from each of the above stated department shall be submitted to the City Engineer clearing this condition. In the event construction over the existing storm drain easement is not approved, a revised map shall be submitted showing no proposed structures within or over the existing storm drain easement.

3. That the Los Angeles Department of Sanitation Clean Water Conveyance Division shall review and approve the storm drain easements and additional easements as necessary for access and maintenance purposes for the proposed development during final map process. **A letter from the Los Angeles Department of Sanitation Clean Water Conveyance Division shall be submitted to the City Engineer clearing this condition.**

4. That the existing public storm drain easement, including necessary access easements and dedication required as stated herein be shown on the final map.

5. That a Covenant and Agreement be recorded advising all future owners and builders that prior to the issuance of a building permit a Notice of Acknowledgement of Easement must be recorded and an application to do work in any drainage easements and to construct over the existing sanitary drainage facilities must be submitted to the City Engineer for approval.

6. That a 2.5-foot wide strip of land be dedicated along Orange Street to complete a 30-foot half right-of-way in accordance with Local Street standards, including a 15-foot by 15-foot property line cut corner or 20-foot radius property line return at the intersection with San Vicente Boulevard.

7. That a 3-foot wide strip of land be dedicated along Sweetzer Avenue to complete a 33-foot half right-of-way in accordance with Collector Street standards, including a 15-foot by 15-foot property line cut corner or 20-foot radius property line return at the intersection with San Vicente Boulevard.

8. That the subdivider make a request to the Central District Office of the Bureau of Engineering to determine the capacity of existing sewers in this area.

9. That all the proposed tract map boundary lines be properly established in accordance with Section 17.07.D of the Los Angeles Municipal Code prior to the recordation of the final map satisfactory to the City Engineer.

11. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

    a) Improve San Vicente Boulevard adjoining the subdivision with the construction of the following:

        (1) A concrete curb, a concrete gutter and a full-width concrete sidewalk with tree wells.

        (2) Suitable resurfacing of roadway pavement satisfactory to the City Engineer.

        (3) Any necessary removal and reconstruction of existing improvements including curb ramps per BOE standards and Special Order 01-1020 satisfactory to the City Engineer.

    b) Improve Orange Street being dedicated and adjoining the subdivision by the construction of the following:

(1) A concrete curb, a concrete gutter, and a 12-foot wide concrete sidewalk with tree wells.

(2) Suitable surfacing to join the existing pavement and to complete an 18-foot half roadway.

(3) Any necessary removal and reconstruction of existing improvements including reconstruction of curb ramp at the intersection with San Vicente Boulevard per BOE standards and Special Order 01-1020.

(4) The necessary transitions to join the existing improvements all satisfactory to the City Engineer.

c) Improve Sweetzer Avenue being dedicated and adjoining the subdivision with the construction of a full-width concrete sidewalk with tree wells. Repair and or replace any broken, damaged or off-grade concrete curb, gutter and roadway pavement including any necessary removal and reconstruction of existing improvements satisfactory to the City Engineer.

d) Repair and or replace any broken, damaged or off-grade alley pavement and longitudinal concrete gutter. Reconstruct the alley intersections at Orange Street and Sweetzer Avenue including any necessary removal and reconstruction of existing improvements satisfactory to the City Engineer.

e) That Board of Public Works approval be obtained, prior to the recordation of the final map, for the removal of any tree in the existing or proposed right-of-way area. The Bureau of Street Services, Urban Forestry Division, is the lead agency for obtaining Board of Public Works approval for removal of such trees.

Any questions regarding this report should be directed to Quyen Phan of the Permit Case Management Division, located at 201 North Figueroa Street, Suite 290, or by calling (213) 808-8604.

EXHIBIT 2

Gibson transportation consulting, inc.

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/onlinedocs/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/onlinedocs/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.