

From: Oaks Planning <planning@oakshome.org>
Sent time: 06/01/2020 09:30:36 AM
To: MIndy Nguyen <mindy.nguyen@lacity.org>
Mayor Eric Garcetti <Mayor.Garcetti@lacity.org>; Councilmember David Ryu, CD4 <Councilmember.Ryu@lacity.org>; Councilmember Mitch O'Farrell, CD13 <Councilmember.OFarrell@lacity.org>; Vince Bertoni, Director of City Planning <Vince.Bertoni@lacity.org>; Kevin Keller, Executive Officer of City Planning <Kevin.Keller@lacity.org>; George Skarpelos, President, Hollywood United Neighborhood Council <George@myhunc.com>; Emma Howard, Director of Planning, CD4 <Emma.Howard@lacity.org>; Nicholas Greif, Chief of Staff, CD4 <Nicholas.Greif@lacity.org>; Paola Mendez, Planning Deputy, CD4 <Paola.Mendez@lacity.org>; Rachel Fox, Field Deputy, CD4 <Rachel.Fox@lacity.org>
Cc:
Subject: ENV-2018-2116-EIR Hollywood Center Project
Attachments: Hollywood Center DEIR Comment by Oaks.pdf Hollywood Center Project - KOA Technical Memorandum - IJJB51089 TMemo-v3 HollywCtrComms 1Jun20.pdf

Ms. Nguyen,

Please enter two attached documents into the record for ENV-2018-2116-EIR, Hollywood Center Project.

Please confirm timely receipt.

Thank you.

THE PLANNING COMMITTEE





PO BOX 29155 LOS ANGELES CA 90029-0155

June 1, 2020

Ms. Mindy Nguyen
City of Los Angeles
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Re.: Hollywood Center Project
Case Number: ENV-2018-2116-EIR

Dear Ms. Nguyen,

Our homeowners association represents approximately 800 owners of single family residences in The Oaks, a hillside community north of Franklin Avenue, east of Beachwood Canyon and west of Fern Dell. Bronson Avenue and Canyon Drive, which intersect with Franklin Avenue, both represent main ingress/egress routes to and from our neighborhood.

Over the past two decades traffic volumes and congestion along Franklin Avenue have been steadily increasing. In normal times, i.e. prior to the coronavirus outbreak, westbound traffic along Franklin is jammed every weekday during afternoon rush hour, creating major gridlock in all directions at the Franklin/Bronson and Franklin/Canyon intersections - one of the reasons why we have proposed the installation of a traffic signal at Franklin & Canyon.

The congestion and traffic jams are primarily caused by great numbers of vehicles heading west toward the onramp of the northbound Hollywood Freeway (US-101) and by the very limited capacity of that metered onramp. This congestion is compounded by the poor configuration and inadequate design of the Franklin/Argyle intersection adjacent to the onramp (vehicles approaching Argyle from the west on Franklin have to make a u-turn at that intersection in order to access the freeway onramp).

LADOT is quite aware of these problems and has tried, for years, to work with CalTrans on potential mitigation options. In fact, former City Councilmember Tom LaBonge (CD4), during his term in office, proposed adding a lane to Franklin Avenue (between Argyle and Vista del Mar Avenues) for westbound traffic heading to that onramp. But none of those plans ever advanced beyond a preliminary phase.

Instead, two more high-rises were erected immediately south of the Franklin/Argyle intersection (Argyle House at 1755 Argyle and Kimpton Everly at 1800 Argyle). Both have added even more vehicular traffic to the already overburdened Franklin/Argyle intersection.

Despite all these facts, the Traffic Assessment for the proposed Hollywood Center Project did not cover the Franklin/Argyle intersection for potential impacts. We have asked KOA, a well-respected transportation consulting firm, to prepare a Technical Memorandum to comment on this omission. Please find their conclusions enclosed with this letter.

CalTrans was strongly opposed to a previous project, known as The Millennium, which was proposed by the same developer and for the same site as the current Hollywood Center Project. Since then, no design changes have been implemented to the Franklin/Argyle intersection or the adjacent onramp to the northbound US-101 Freeway. Remarkably, CalTrans has, to this day, voiced no concerns about the new Hollywood Center Project.

We have reached out to CalTrans seeking comment but, due to the Stay-at-Home Order and the short time remaining to meet the deadline for comments on the DEIR, our consultant has not been able to initiate an in-depth dialogue with CalTrans about what made them change their stance regarding the new project which is of similar scope and size as the former Millennium.

The Hollywood Center, if built as proposed, would likely have disastrous consequences for traffic at Franklin & Argyle, with collateral negative impacts on nearby residential neighborhoods north of the Franklin Corridor, such as ours. Instead of undertaking an honest attempt to mitigate these problems, we see an effort by the developer and his consultants to avoid any critical traffic issues by choosing and adjusting metrics and threshold standards so that they appear most advantageous to their project.

Please make sure this letter and the attached document (Technical Memorandum) are entered into the public record for this project.

Thank you,

Holly Purcell

President
THE OAKS HOMEOWNERS ASSOCIATION

ATTACHMENT: Hollywood Center Project - KOA Technical Memorandum - IJJB51089
TMemo-v3 HollywCtrComms 1Jun20

CC:

Mayor Eric Garcetti (Mayor.Garcetti@lacity.org)

Councilmember David Ryu, City Council District 4 (Councilmember.Ryu@lacity.org)

Councilmember Mitch O'Farrell, City Council District 13

(Councilmember.OFarrell@lacity.org)

Vince Bertoni, Director of City Planning (Vince.Bertoni@lacity.org)

Kevin Keller, Executive Officer of City Planning (Kevin.Keller@lacity.org)

George Skarpelos, President, Hollywood United Neighborhood Council

(George@myhunc.com)

Nicholas Greif, Chief of Staff, City Council District 4 (Nicholas.Greif@lacity.org)

Emma Howard, Director of Planning, City Council District 4 (Emma.Howard@lacity.org)

Paola Mendez, Planning Deputy, City Council District 4 (Paola.Mendez@lacity.org)

Rachel Fox, Field Deputy, City Council District 4 (Rachel.Fox@lacity.org)



TECHNICAL MEMORANDUM

Date: June 1, 2020

To: Alexander von Wechmar – The Oaks Homeowners Association

From: Brian Marchetti, AICP

Subject: Review of Hollywood Center Draft EIR Traffic Assessment

This letter provides a review of potential impact areas not reviewed to an adequate level by the Hollywood Center (formerly Millennium Hollywood project) traffic study and EIR, focusing on areas of particular concern to The Oaks Homeowners Association.

Area resident associations and the local Neighborhood Council have expressed concerns over the adequacy of the traffic analysis in comment letters submitted to the City on the EIR. The Oaks Homeowners Association submitted a comment letter on the project Notice of Preparation on October 4, 2018, stating concerns over high existing traffic volumes on Franklin Avenue and the potential negative effects on this corridor from the proposed project. The Argyle Civic Association, representing the local neighborhood on Argyle Avenue, submitted a letter on September 4, 2018, with similar concerns on routes to and from freeway access points via Argyle Avenue, Franklin Avenue, and other local roadway routes. The Hollywood United Neighborhood Council provided a list of issues requested to be included in the EIR analysis, including an expanded analysis of freeway access and traffic impacts on area roadways including Franklin Avenue. The Hollywood Dell Civic Association filed an appeal in opposition to the former Millennium Project, and traffic needs were defined in that appeal for the Argyle/Franklin intersection and the Franklin Avenue corridor

Concerns over the adequacy of analysis of project traffic to the north of the site, to the US-101 and Franklin Avenue corridors, are described in more detail below.

Freeway Impacts

Appendix N-1 of the Draft EIR for the proposed project is the Traffic Assessment document. Attachment D of that document is the "State Highway Level of Service Analysis Summary of Results" The following was stated in this document regarding the applied methodology to the freeway facilities analysis: "Based on discussions with Caltrans, a Project-related effect is considered substantial if the traffic generated by the Project: (a) causes the freeway mainline segment level of service (LOS) to deteriorate to LOS F; or (b) when the segment is already at LOS F, causes an increase in the demand/capacity ratio of greater than or equal to 2%." The mainline is the primary roadway of a freeway facility, or the segments between interchanges.

The Caltrans Traffic Impact Study Guide is currently being updated and will be adopted soon, as part of State efforts at incorporating guidance from Senate Bill (SB) 743, and the related implementation of the new California Environmental Quality Act (CEQA) guidelines for transportation analysis that includes the vehicle miles traveled (VMT) metric. The previous version of the Guide, however, stated that the addition of any trips to a facility with deficient LOS (usually E or F, but depending upon the facility) is considered significant. The application of a volume-to-capacity (V/C) ratio increase of 0.02 or higher is more adopted from local jurisdictional guidelines (although many including those defined by LADOT for City roadways are 0.01 at LOS E or F) than consistent with any guidelines for State facilities that have been adopted by Caltrans. The reasoning for the selective adoption of this standard for this project deserves further discussion in the EIR. Many projects that are smaller in size than the proposed project are often determined to have significant impact determinations on freeway facilities.

Appendix I of the updated traffic study is entitled "Intersection Analysis Results Not Required by Transportation Assessment Guidelines". This appendix documents an analysis using the recent but superseded LADOT traffic study guidelines. The following conclusions can be made from the presented data:

- The existing plus-project impact at Argyle/Franklin intersection was 0.009 and 0.010 for the AM and PM peak hours at LOS F.
- The future with-project impact at this location was determined to be 0.009 and 0.011.
- The incremental impact of 0.010 or higher at LOS values of E or F would have been significant under the previous LADOT guidelines. Therefore, the values of 0.010 and 0.011 above would have been significant under the previous LADOT guidelines.

Under current LADOT guidelines, vehicle delay is applied to local intersection analysis in Traffic Assessments reviewed by LADOT, instead of volume-to-capacity values. But the analysis in Appendix I shows the potential for proposed project impacts in the Franklin Avenue corridor, but analysis of this roadway has not been provided in the delay-based analysis.

Study Area and Lack of Analysis to the North

In Appendix E (Added Intersections Analysis, January 2013) of the Final EIR for the previously proposed Millennium project, the following was discussed:

"...in comments on the Draft EIR, concerns were raised about significant Project impacts extending beyond the northern boundary of the area analyzed in the Traffic Study. Two intersections located on the northern boundary of the study area were considered to be significantly impacted - Highland Avenue/Franklin Avenue (north) and Argyle Avenue/Franklin Avenue/I-101 Freeway Northbound On-Ramp in the Traffic Study."

It was stated in this Appendix that the analysis was for informational purposes only, but was provided to address the impacts of the project within an added area beyond what had been included in the study area. These locations were north of the significantly impacted intersections in the traffic study.

There was concerns expressed in public comments on the 2013 study about potential impacts to the north of the project, and the traffic study defined an existing plus-project and a future with-project impact

at the Argyle/Franklin intersection. In the future period, the incremental impact was at 0.029 of the volume-to-capacity ratio when the maximum impact standard is 0.010 at the stated LOS value of F.

On the 2012 Draft EIR, Comment No. 03-6 was submitted by Caltrans, which requested that six freeway ramp/roadway intersections be added to the study area. The Argyle/Franklin/US-101 northbound ramp intersection was included in this request. Therefore, Caltrans had previous strong concerns about project traffic at ramp intersections, but these were excluded from the Hollywood Center Project Traffic Assessment, other than the queuing analysis conducted at some for the freeway corridor analysis. The project trip distribution in the 2012 Draft EIR Traffic Study included the following pattern to the north of the project:

- 10 percent outbound trip distribution north on Argyle Avenue from site, six percent to US-101 northbound ramp at Argyle/Franklin.
- 5 percent inbound trip distribution to Beachwood Drive exit connection and 4 percent westbound on Franklin Avenue. Both of these paths then combined as a 9 percent distribution to make left-turn movement southbound onto Argyle Avenue. An additional one percent is added from the area to the north of Franklin Avenue.

On Figure 7A of the 2020 traffic study, 20 percent of project trips are shown to generally travel north in the Cahuenga Boulevard corridor. An additional 5 percent of traffic is generally assigned to the Vine Street corridor, without any definition as to east-west corridors where traffic may be destined or originating. This is a reduction in distribution to the Vine Street and Franklin Avenue corridors without any justification for this change. Restoration of the previous trip generation pattern applied in the 2012 study could trigger significant impacts to the north of the project that are potentially avoided by this change in distribution.

The study area map illustrates the geographic holes that have been left in the analysis, in that three local roadway segments were analyzed to the north, but major intersections in between those location and the project site were omitted from the analysis. The three analyzed local roadway segments on Argyle Avenue, Vista del Mar Avenue, and Carmen Avenue, all to the north of Franklin Avenue, represent the north end of the study area. If the study area was defined based on where impacts could occur, the omission of major intersections in the Franklin Avenue corridor between the project site and these roadway segment analysis locations is an omission that should be rectified.

The use of the VMT metric in traffic studies in the City of Los Angeles to fulfill updated CEQA guidelines has created a hybrid approach to studies under LADOT review. This includes more focused local intersection and segment study areas for vehicle volumes and level of service, and a regional approach to larger area impacts analysis through VMT analysis. This approach should not truncate study areas so far that local routes to and from major regional travel routes such as the US-101 corridor along Franklin Avenue are excluded. Potential impacts in this corridor represent a local issue.

Cumulative Project Impacts

Other projects in the area have added new daily and peak-hour vehicle volumes to the Argyle Avenue and Franklin Avenue corridors, due to their proximity to these roadways:

- Argyle House (1755 Argyle / 6220 West Yucca) – This project has two buildings. One is 32 stories in height, including 6,980 square feet of commercial/restaurant space, residential and hotel areas. 191 multi-family residential units, and 260 hotel rooms.
- Kimpton Everly Hotel (1800 Argyle) – A 225-room hotel.

Both of these projects were included in the cumulative/planned projects list in the traffic study and are currently operational, but their effects on the roadways to the north of Yucca Street where access is provided to and from the US-101 freeway is not considered in the Hollywood Center Project Traffic Assessment. Yucca Street is the northern limit of the project study area. An expansion of the study area to the north would disclose potential impacts in this area but currently this is not analyzed under current guidelines in the study.