

**LETTER NO. 3**

Dated: 2/27/01

Robert Takasaki  
Department of Transportation  
[Inter-Departmental Correspondence]

**COMMENT 3.1**

The Los Angeles Department of Transportation (LADOT) has reviewed the Draft Environmental Impact Report (DEIR), dated January 2001 and supporting traffic study prepared by traffic consultant, The Mobility Group, for the Los Angeles Entertainment District project. The proposed project covers several blocks north and east of the Staples Center. The project area covers six parcels as follows: Olympic West and Olympic East parcels bounded by Olympic Boulevard on the north, Figueroa Street on the east, 11th Street on the south and Cherry Street on the west; Figueroa Central and Figueroa South parcels bounded by 11th Street on the north, Flower Street on the east, Pico Boulevard on the south and Figueroa Street on the west; Olympic North parcel on the north side of Olympic Boulevard between Georgia Street and Francisco Street and Figueroa North parcel on the north side of Olympic Boulevard between Figueroa Street and Flower Street. Most of the project area is currently being used as surface parking lots for the Staples Center.

The traffic study analyzed 40 intersections for the weekday PM peak hour and Saturday evening peak hour. Existing traffic volume counts were taken during concurrent events at the Staples Center and the Convention Center in order to analyze a “worse case” situation. The DEIR indicated that without mitigation there would be 17 intersections significantly impacted during the weekday PM peak hour and 10 intersections significantly impacted during the Saturday evening peak hours. The DEIR proposes mitigation measures at 6 locations. Additional traffic mitigations have been explored by LADOT as noted below.

**RESPONSE 3.1**

The description of the traffic study for the Project is consistent with the Draft EIR.

**COMMENT 3.2**

**PROJECT DESCRIPTION**

The proposed project consists of the following land uses:

PROPOSED LAND USE	SQUARE FEET
2 Hotels	1,060,000 SF (1200 rooms)
	530,000 SF (600 rooms)
Entertainment	195,000 SF
Retail	385,000 SF
Restaurant	265,000 SF
Live Theater	270,000 SF (7,000 seats)
Office	165,000 SF
Health Club	125,000 SF
Medical Office	135,000 SF
Residential	870,000 SF (800 DU)
<b>TOTAL</b>	<b>4,000,000 SF</b>

The project will provide 5,305 on-site parking spaces and 952 off-site parking spaces to meet the Code parking requirement of 6,257 spaces. The project will also provide an additional 2,200 parking spaces reserved for the Staples Center as replacement for a similar number of parking spaces displaced by the project.

Driveway access to project parking is proposed as follows:

- For the Olympic West parcel, access/egress would be provided on Cherry Street (right-in, right-out only), on Olympic Boulevard (right-in, right-out only), and on Georgia Street (full movement access).
- For the Olympic East parcel, access/egress would be provided on Olympic Boulevard opposite Francisco Street (full movement access), and on Georgia Street (full movement access).
- For the Olympic North parcel, access/egress would occur on both Georgia Street and Francisco Street (both full movement access).
- For the Figueroa North parcel, access/egress would occur on both Figueroa Street and Flower Street (both right-in, right-out only).
- For the Figueroa Central parcel, access/egress would be provided on 11th Street, Flower Street, and 12th Street (all right-in, right-out only),
- For the Figueroa South parcel, access/egress would be provided on both Figueroa Street and Flower Street (both right-in, right-out only).

This project would generate approximately 48,000 net daily trips with 3,612 net trips during the weekday PM peak hour and 5,181 net trips during the Saturday evening peak hour. Trip rates were adjusted consistent with LADOT policies and procedures to reflect internal capture trips between the

project, the Staples Center and the Convention Center, and trips within the project. Trip rates were also adjusted to reflect the high level of transit service in the area, proximity of the project within walking distance of many Downtown offices and residential buildings, as well as pass-by trips. Project buildout is expected to occur in the year 2008.

### **RESPONSE 3.2**

The project description provided in the comment is consistent with Section II, Project Description, of the Draft EIR.

### **COMMENT 3.3**

#### **SIGNIFICANT TRAFFIC IMPACT LOCATIONS**

The results of the DEIR indicate that the following 17 locations will have significant traffic impacts during the weekday PM peak hour and 10 locations will have significant traffic impacts during the Saturday evening peak hour. It should be noted that even with the proposed mitigations, the impact will remain significant for the majority of locations.

#### **WEEKDAY PM PEAK HOUR**

1. Blaine Street & 11th Street\*
2. Cherry Street & Pico Boulevard
3. Georgia Street & Olympic Boulevard\*
4. Francisco Street & 9th Street\*
5. Francisco Street & Olympic Boulevard\*
6. Figueroa Street & 8th Street\*
7. Figueroa Street & 9th Street\*
8. Figueroa Street & Olympic Boulevard\*
9. Figueroa Street & 11th Street\*
10. Figueroa Street & Pico Boulevard\*
11. Flower Street & 9th Street\*
12. Flower Street & Olympic Boulevard\*
13. Flower Street & 11th Street\*
14. Flower Street & Pico Boulevard\*
15. Flower Street & 7th Street\*
16. Flower Street & 8th Street\*
17. Grand Avenue & 11th Street

#### **SATURDAY EVENING PEAK HOUR**

1. Cherry Avenue & I-110 N/B on-ramp/11th Street\*
2. Cherry Avenue & Pico Boulevard
3. Georgia Street & Olympic Boulevard\*

4. Georgia Street & 11th Street”
5. Francisco Street & Olympic Boulevard\*
6. Figueroa Street & Olympic Boulevard
7. Figueroa Street & 11th Street\*
8. Flower Street & 9th Street\*
9. Flower Street & Olympic Boulevard\*
10. Flower Street & 11th” Street\*

\* Still significantly impacted even after mitigations.

### **RESPONSE 3.3**

Section IV.F.1, Traffic, of the Draft EIR points out on pages 276 to 277 that in the PM peak hour the physical mitigation measures would eliminate two significant impacts and reduce the impact at one location. In addition, while significant impacts would remain at 15 locations only two locations would operate at LOS E, and the remaining 13 locations would continue to operate at satisfactory conditions (with 6 locations operating at LOS C, and 7 locations at LOS D). The Draft EIR also points out that during the Saturday evening hour, the physical mitigation measures would eliminate two impacts, and that while significant impacts would remain at 8 locations, all 8 would operate at satisfactory conditions (with 5 locations operating at LOS C, and 3 locations at LOS D).

### **COMMENT 3.4**

#### MITIGATION MEASURES

The following are the recommended mitigation measures. LADOT has reviewed them with the developer’s representatives and their consultants and generally agrees that they are acceptable. However, specific comments on each are summarized below.

Blaine Street/11th Street/SR-110 SB On-Ramp. The proposed mitigation to widen the Harbor Freeway southbound on-ramp from one to two lanes is acceptable to LADOT. This also requires approval by Caltrans.

Cherry Street & Pico Boulevard. The proposed mitigation to widen and re-stripe the northbound approach of Cherry Street to provide two exclusive left-turn lanes, two through lanes, and an exclusive right-turn only lane is acceptable to LADOT.

Georgia Street & Olympic Boulevard. The proposed mitigation to provide a protected/permissive westbound left turn signal phase on Olympic Boulevard and to widen and restripe the northbound approach of Georgia Street to provide an exclusive left-turn lane, one through lane and an exclusive right-turn lane is acceptable to LADOT.

Francisco Street & Olympic Boulevard. The proposed mitigation to install a new traffic signal at this intersection and to widen the south side of Olympic Boulevard and re-stripe the westbound approach of Olympic Boulevard in order to provide dual left-turn lanes and a protected only left turn signal phase at the project driveway is acceptable to LADOT. The project driveway is also proposed to be striped for two inbound lanes and two outbound lanes (a shared left/through/right-turn lane and an exclusive right-turn lane). The proposed mitigation would also stripe the southbound approach of Francisco Street to provide an exclusive left turn lane and a shared through/right-turn lane. LADOT requires that the developer provide a separate traffic signal warrant analysis for review and approval by LADOT prior to installation of the signal.

Figueroa Street & Olympic Boulevard. The proposed mitigation to widen and restripe the eastbound approach of Olympic Boulevard to provide dual left-turn lanes (including protected only left-turn signal phase), three through lanes and a separate right turn lane; to widen and restripe the westbound approach of Olympic Boulevard to provide an exclusive left-turn lane, three through lanes and a separate right-turn lane; and to lengthen the existing northbound left-turn lane on Figueroa street is acceptable to LADOT.

Grand Avenue & 11th Street. The proposed mitigation to re-stripe the westbound approach of 11th Street to provide an exclusive left-turn lane and two through lanes is acceptable to LADOT.

Unless otherwise specified, all traffic mitigation measures shall be implemented through the Bureau of Engineering (BOE) B-Permit process or Caltrans' encroachment permit process. Construction of the improvements to the satisfaction of LADOT, BOE and Caltrans must be completed before issuance of any certificate of occupancy. In the event the developer is unable to obtain necessary construction permits from the concerned agencies in a timely fashion, a temporary certificate of occupancy may be granted by the City provided the developer has demonstrated reasonable efforts to complete the necessary designs and improvements to the satisfaction of LADOT. Should any improvement not receive required approval, the City may substitute an alternative measure of an equivalent cost and effectiveness. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, telephone (213) 590-5336, to arrange a pre-design meeting to finalize the proposed design needed for the project.

#### **RESPONSE 3.4**

The summary of the proposed mitigation measures provided by the comment is consistent with Section IV.F.1 of the Draft EIR (pages 271 to 273).

Mitigation Measure No. 5 on page 272 of the Draft EIR has been revised to address the commentor's recommendation regarding a traffic signal warrant analysis at the intersection of Francisco Street and Olympic Boulevard. Refer to Item IV.F.1.e in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

**COMMENT 3.5****HIGHWAY DEDICATION AND STREET WIDENING REQUIREMENTS**

Except where traffic mitigation measures are proposed which results in a need for greater highway dedication and street widening than required for the classification of the abutting street, the project shall, at a minimum, dedicate and widen all adjacent street frontage to their respective highway classification. Because of the expected high pedestrian volumes, notwithstanding standard street crosswalk requirements, LADOT recommends that the project provide a minimum 20-foot wide sidewalk along 11th Street and Figueroa Street frontages and a minimum 15-foot wide sidewalk along all other project street frontages.

**RESPONSE 3.5**

The Draft EIR, Section IV.F.3 (page 304), concluded that impacts to pedestrian safety would be less than significant. Along 11<sup>th</sup> Street and Figueroa Street frontages, the Project has proposed 15-foot sidewalks with additional 8-foot easements, providing an effective sidewalk width of 23-feet, in order to allow planting of trees in the easement to enhance streetscape landscaping, except for 11<sup>th</sup> Street between Cherry Street and Georgia Street and between Figueroa Street and Flower Street (proposed 15-foot sidewalks). LADOT has agreed to these widths, as well as to trees being planted in the easement, providing that no continuous raised planters are located in the easement, and also providing that any street furniture and/or outdoor seating placed in the easement area is subject to modification and/or removal if it is found to be causing problems by restricting pedestrian flow. The Project would provide 15-foot sidewalks along all other frontages, except Cherry Street between 11<sup>th</sup> Street and Olympic Boulevard for which 12-foot sidewalks would be provided.

**COMMENT 3.6**

Olympic Boulevard is classified as a Class II Major Highway which requires an 80-foot roadway on a 104-foot right-of-way (40-foot half width roadway on a 52-foot half width right-of-way). Except for the south side of Olympic Boulevard between Cherry Street and Georgia Street, which is already improved to a 47-foot half width roadway on a 62-foot half width right-of-way, and the south side of Olympic Boulevard west of Figueroa Street, which is already improved to a 52-foot half width roadway on a 67-foot half width right-of-way, most of the remainder of Olympic Boulevard is presently improved to a 37-foot half width roadway on 50-foot half width right-of-way. However, the north side of Olympic Boulevard between Figueroa Street and Flower Street is presently improved to a 35-foot half width roadway on a 48-foot half width right-of-way. LADOT recommends a minimum 2-foot or 4-foot dedication and 3-foot or 5-foot widening along the project frontage to bring Olympic Boulevard up to Class II Major Highway standards except where greater dedication and widening are needed for traffic mitigation.

**RESPONSE 3.6**

A mitigation measure has been added to address the commentor's recommendation. Refer to Item IV.F.1.m in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

**COMMENT 3.7**

Georgia Street is classified as a Collector Street which requires a 44-foot roadway on a 64-foot right-of-way (22-foot half width roadway on a 32-foot half width right-of-way). Georgia Street between 11th Street and Olympic Boulevard is presently improved to Collector Street standards. The east side of Georgia Street north of Olympic Boulevard is presently improved to a 20-foot half width roadway on a 30-foot half width right-of-way. LADOT recommends a 2-foot dedication and 2-foot widening along the Georgia Street frontage north of Olympic Boulevard.

**RESPONSE 3.7**

A mitigation measure has been added to address the commentor's recommendation. Refer to Item IV.F.1.n in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

**COMMENT 3.8**

Francisco Street is classified as a Collector Street north of Olympic Boulevard. Presently the west side of Francisco Street north of Olympic Boulevard is improved to a 20-foot half width roadway on a 30-foot halfwidth right-of-way. LADOT recommends 2-foot dedication and 2-foot widening along the Francisco Street frontage north of Olympic Boulevard.

**RESPONSE 3.8**

A mitigation measure has been added to address the commentor's recommendation. Refer to Item IV.F.1.o in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

**COMMENT 3.9**

Eleventh Street is classified as a Collector Street. Eleventh Street is presently improved to a variable 82-foot to 92-foot roadway on a variable 117-foot to 127-foot right-of-way between Georgia Street and Figueroa Street. Between Figueroa Street and Flower Street, 11th Street is improved to a 66-foot roadway on 86-foot right-of-way. LADOT does not recommend any additional dedication or widening on 11th Street except for a minimum 20-foot wide sidewalk on 11th Street between Figueroa Street and Flower Street.

**RESPONSE 3.9**

The Project has proposed 15-foot sidewalks with additional 5-foot easements, providing an effective sidewalk width of 20 feet, in order to allow planting of trees in the easement to enhance streetscape landscaping and to provide street furniture and/or outdoor seating placed in the easement area

subject to modification and/or removal if it is found to be causing problems by restricting pedestrian flow.

**COMMENT 3.10**

Figueroa Street is classified as a Class II Major Highway. Figueroa Street is presently improved to a variable 30-foot to 52-foot half width roadway on a variable 45-foot to 67-foot halfwidth right-of-way width. LADOT recommends a minimum 60-foot half width right-of-way to implement a minimum 40-foot half width roadway and 20-foot wide sidewalk along all project frontages.

**RESPONSE 3.10**

The recommendation provided in the comment does not address a specific impact of the Project. At the time of preparing responses to comments, the Project Applicant has not agreed to this recommendation. Because of the offset centerline along much of Figueroa Street, and the extra wide dedication on the west side, much of Figueroa Street already meets Class II Major Highway standards. The Project Applicant therefore questions the need for the dedication on the east side, and is continuing to review this recommendation with LADOT to explore the need for this improvement, and the potential feasibility of any resultant street cross-sections and configurations and the feasibility of relocating the centerline.

Furthermore, as noted in Response to Comment 3.5, the Project would provide sidewalks with an effective width of 23 feet along Figueroa Street, south of Olympic Boulevard.

**COMMENT 3.11**

Flower Street is classified as a Secondary Highway which requires a 35-foot half width roadway on a 45-foot half width right-of-way. Presently, Flower Street is improved to Secondary Highway standards along the project frontage.

The developer should also check with BOE's Land Development Group for any additional highway dedication or street widening requirements.

**RESPONSE 3.11**

Refer to Letter No. 1 and Responses to Comments 1.1 through 1.9 regarding the Bureau of Engineering's comments on the Draft EIR.

**COMMENT 3.12**

CLOSURE OF 11TH STREET



The DEIR discussed the developer's proposal to close 11th Street between Georgia Street and Figueroa Street on a regular basis outside the AM and PM peak hours. LADOT is not opposed to the proposed closure provided that the measures mentioned in the DEIR for closing the street are implemented. In addition, LADOT recommends that the developer, at no cost to the City, install bollards and chains to prevent pedestrian J-walking along 11th Street whenever the street is opened to traffic. In accordance with City policy, the applicant should fund any LADOT traffic officers which may be needed for traffic control. LADOT also recommends that initially the closures occur only on Friday nights and weekends but may be expanded later to weekdays in the off-peak hours, after appropriate review and study. The authority for the closures should be approved by the City Council by separate action as well be included in the Specific Plan being developed for this area.

### **RESPONSE 3.12**

At the time of preparation of responses to comments, the Project Applicant remains interested in also closing 11th Street during weekday off-peak hours, and would suggest this be initiated after six months of street closure during weekends.

### **COMMENT 3.13**

#### **NARROW THE ROADWAY WIDTH OF 11TH STREET**

The developer proposes to narrow the roadway width of 11th Street between Figueroa Street and Georgia Street primarily on the north side. LADOT has no objections to narrowing the existing roadway width of 11th Street between Figueroa Street and a point approximately 400 feet west of Figueroa Street (length of proposed pedestrian plaza on north side of 11th street) as long as the remaining roadway width provides a minimum 65-foot roadway for the two westbound lanes and four eastbound lanes satisfactory to LADOT. Provision of any "bump out" design must be approved by LADOT.

### **RESPONSE 3.13**

At the time of preparation of responses to comments, the Project Applicant is also proposing to narrow the existing roadway width of 11th Street all along the block between Figueroa Street and Georgia Street, such that the roadway width would be approximately 67 to 68 feet throughout the block. The Applicant is continuing to discuss this with LADOT.

### **COMMENT 3.14**

#### **OTHER MITIGATION MEASURES IN DEIR**

Besides the major and specific mitigation measures, several general-type mitigation measures proposed are summarized below.

1. The project Proposes to enhance connections and linkages to transit; i.e. improve physical pedestrian linkages between the project and the Blue Line Station on Flower Street between Pico Boulevard and 12th Street, install directional signage to bus and rail lines, construct landscaped bus stops, and provide six new bus shelters and two on-site transit information kiosks.
2. Where feasible, the project proposes to install, 12-foot wide crosswalks at Figueroa Street/Olympic Boulevard, Figueroa Street/Pico Boulevard, 12th Street/Flower Street and Pico Boulevard/Flower Street.
3. The project proposes to initiate and maintain a Transportation Demand Management (TDM) program to promote the use of transit and rideshare for employees and visitors. LADOT recommends that the TDM program be submitted to LADOT for review and approval prior to issuance of the first certificate of occupancy for the project.
4. The project proposes to provide up to \$25,000 to LADOT for installation of guide signs to direct inbound traffic to parking facilities and outbound traffic to arterials and freeways ramps.
5. The project proposes to provide up to 3 additional changeable message signs (CMS) to help direct traffic during concurrent Staples Center and Convention Center events and during closure of 11th Street. LADOT recommends that this be increased to 5 CMS and 3 ATSA cameras at locations to be specified by LADOT.
6. The project proposes to provide one additional CMS on the freeway mainline system if Caltrans determines that such a sign is necessary.
7. The project proposes to coordinate with LADOT and Caltrans to develop a fixed or changeable signage program to direct traffic to utilize certain freeway off-ramps to access the project site.
8. The project proposes to participate in the existing Event Management Coordinating Committee created by the Staples Center Parking and Circulation Management Plan (PCMP).
9. The project proposes to realign 12th Street at Figueroa Street to eliminate the existing jogged intersection.

### **RESPONSE 3.14**

The comment is generally consistent with Section IV.F.1 of the Draft EIR (pages 274 to 275). As a point of clarification, the Project proposes to install 30-foot wide crosswalks at the locations indicated in Item No. 2 in the comment. Refer to Mitigation Measure No. 12 on page 274 of the Draft EIR.

**COMMENT 3.15****OTHER IMPROVEMENTS RECOMMENDED BY LADOT**

LADOT has met with the applicant and Caltrans to propose further traffic improvement projects, as summarized below:

1. LADOT is not opposed to a proposal in the traffic study that recommends that Figueroa Street be converted to a two-way street between 9th Street and Olympic Boulevard. LADOT recommends this as a voluntary improvement for the developer contingent on the City acquiring the necessary right-of-way on the west side of Figueroa Street to permit the developer to widen the west side of the street by 6 feet and restripe the street for a 20-foot wide southbound traffic lane. This section of Figueroa Street is presently a one-way northbound street with a 14-foot wide striped area for bus loading/unloading. The proposed improvement would improve access and circulation directly from the freeway to the area by providing a single southbound lane while providing space for bus loading/unloading adjacent to the west curb between 9th Street and Olympic Boulevard.

**RESPONSE 3.15**

Although the recommendation provided in the comment does not address a Project-related impact, the Applicant has indicated that the Project will implement the required improvements to convert Figueroa Street to a two-way street between 9<sup>th</sup> Street and Olympic Boulevard, contingent on the City acquiring the necessary right-of-way on the west side of Figueroa Street.

**COMMENT 3.16**

2. LADOT is not opposed to a proposal in the traffic study that recommends that James Wood Boulevard (formerly 9th Street) be closed just west of the Harbor Freeway to allow Harbor Freeway southbound off-ramp traffic to be able to make an eastbound right turn at Georgia Street or at Francisco Street and thereby provide more direct access to the project site. LADOT recommends this as a voluntary improvement for the developer contingent on the City authorizing the closure of James Wood Boulevard to permit the developer to cul-de-sac eastbound James Wood Boulevard at the Harbor Freeway southbound off-ramp so that the off-ramp traffic can access the south side of the street where it can make a right-turn at Georgia Street or Francisco Street. LADOT will pursue the proposed street closure with BOE and the Board of Public Works. In connection with this improvement, LADOT recommends that the developer do a voluntary improvement to separate the Harbor Freeway northbound off-ramp traffic to James Wood Boulevard from eastbound through traffic on James Wood Boulevard at the Francisco Street signal by restriping the street to provide more space between the two movements and provide a separate signal phase for each movement. This will allow northbound off-ramp traffic to merge easier into the eastbound curb lane to make a right turn at Figueroa Street if Figueroa Street is made a two-way street. This also requires Caltrans approval.

**RESPONSE 3.16**

Although the recommendation provided in the comment does not address a Project-related impact, the Applicant has indicated that the Project will implement the necessary improvements to close James Wood Boulevard (formerly 9<sup>th</sup> Street) just west of the Harbor Freeway, contingent on the City authorizing the closure of James Woods Boulevard. The Applicant will also voluntarily implement the necessary improvements to separate the Harbor Freeway northbound off-ramp traffic to James Wood Boulevard from eastbound through traffic on James Wood Boulevard at the Francisco Street signal.

**COMMENT 3.17**

3. LADOT recommends that the project provide a large area where media trucks can stage for Staples Center events as well as provide additional communication cable conduits under 11th Street for use by the media. The media presently use the Staples Center parking lot on the north side of 11th Street west of Figueroa Street which will no longer be available when the project is built.

**RESPONSE 3.17**

The Applicant shall provide a portion of the area north of 11<sup>th</sup> Street between Cherry Street and Georgia Street, which is set aside for expansion of the Los Angeles Convention and Exhibition Center, for staging of media trucks. At the time of expansion of the Convention Center, the media area will be incorporated into the design of the Convention Center or another suitable location will be provided. In no event will any media staging areas be located in any residential areas either west of the Harbor Freeway or elsewhere. There is no plan to add additional cable conduits under 11<sup>th</sup> Street, as sufficient capacity already exists.

**COMMENT 3.18**

4. LADOT recommends that the developer extend the lease and provide improvements to the existing LADOT Traffic Management Center (TMC) serving the Staples Center by providing access to restroom facilities and parking for LADOT vehicles.

**RESPONSE 3.18**

The Applicant will provide access to restroom facilities in the adjacent office building (1100 S. Flower Street), as well as pre-event parking in the adjacent parking structure on Hope Street.

**COMMENT 3.19**

5. LADOT recommends that developer work with LADOT to identify a suitable location adjacent to the project site for use as a dedicated taxi stand for the live theater.

**RESPONSE 3.19**

These issues are currently being discussed between the Project Applicant and LADOT.

**COMMENT 3.20**

6. LADOT recommends that the project be responsible for any relocation and/or modification of the existing Highway Advisory Radio system for the Staples Center if required as a result of the construction of the project.

**RESPONSE 3.20**

A mitigation measure has been added to address the commentor's recommendation. Refer to Item IV.F.1.d in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

**COMMENT 3.21**

**NEIGHBORHOOD TRAFFIC MANAGEMENT PLAN (NTMP)**

The project proposes to fund up to \$100,000 for studies, evaluation and implementation of a NTMP. LADOT supports the concept of a NTMP funded by the developer. However, the exact amount of funding may need to be increased to cover the cost of the community hiring their own traffic consultant to assist in development and review of the initial plan, LADOT costs to review and approve the plan including meetings with the Council Office and communities and the costs to implement the plan.

The plan should include a separate amount of monies for implementation of a preferential parking district if requested by the neighborhood and found warranted by LADOT. The actual amount of funding for the NTMP and preferential parking program are still to be determined.

**RESPONSE 3.21**

The proposed measure to fund up to \$100,000 for studies, evaluation and implementation of NTMP includes monies for the implementation of a preferential parking district if required by the neighborhood and found warranted by LADOT. In addition, the Applicant will work with the City and the community in an effort to establish a pilot Preferential Parking Program. The Applicant has committed to fund such a program up to \$25,000 per year over a three year period.

**COMMENT 3.22**

**PARKING ANALYSIS**

The project will displace approximately 2,200 parking spaces currently allocated for the Staples Center. The project also provides 5,305 parking spaces in subterranean and above-grade parking

garages at various locations on the project site as well as 952 off-site parking spaces (at least 775 spaces for employees) which would be connected to the project site by a shuttle bus system. The project would also provide an additional 2,200 parking spaces reserved for the exclusive use of Staples Center patrons as replacement for the displaced parking in an approximately 3,000 space parking structure to be constructed on the Olympic West parcel. The DEIR indicates that the peak day parking demand for the project is 8,061 spaces on a weekday between 8 PM and 9 PM and 8,138 spaces on a Saturday between 8 PM and 9 PM.

The Code required parking for the project is 6,257 spaces. The project would provide a total of 6,257 spaces through 5,305 on-site spaces and 952 off-site spaces by covenant within 1,500 feet of the project site. For the peak day, the total peak parking demand of 8,138 spaces on a Saturday which would exceed the 6,257 spaces provided by the project resulting in a shortfall of 1,881 spaces which the project proposes to make up by utilizing either the 2,200 spaces reserved for the Staples Center when the Staples Center is closed or from nearby available on-street parking spaces or within existing privately owned parking lots in the area.

### **RESPONSE 3.22**

The comment is generally consistent with Section IV.F.2 of the Draft EIR (pages 283 to 294). It should be clarified that the additional 2,200 parking spaces provided by the Project are non-exclusive.

### **COMMENT 3.23**

#### **CONSTRUCTION IMPACTS**

The project proposes to develop a Construction Management Plan which will provide for the coordination of construction areas and safe pedestrian movements throughout the project area and between the project site and the Staples Center, Convention Center and surrounding land uses. LADOT recommends that the Construction Management Plan be prepared and submitted to LADOT for review and approval prior to the start of any construction work. LADOT also recommends that the Construction Management Plan address parking for the Staples Center to insure that as the project is built, replacement parking is provided for the Staples Center and that all construction activities affecting traffic during Staples Center and Convention Center events is coordinated through the Staples Center Event Management Coordinating Committee to minimize any disruption to traffic during construction

### **RESPONSE 3.23**

As discussed in Section IV.F.2 of the Draft EIR (page 288), during construction, certain areas of parking for STAPLES Center will be removed from the overall supply. These will be primarily spaces for premier seat and season ticket holders. STAPLES Center will maintain adequate replacement of parking spaces prior to construction. For example, the first anticipated construction

activity on the Olympic Properties would be the parking garage, which will provide replacement parking for the existing surface lots on both the Olympic West and Olympic East Properties. As construction proceeds on the remainder of these properties, the surface parking will no longer be needed. Other than the removal and replacement of parking for STAPLES Center, no parking spaces in general public use will be removed by the Project. No parking impacts are therefore expected to either STAPLES Center or the Convention Center during construction.

Mitigation Measure No. 2 on page 294 stipulates that as part of the Construction Management Plan, measures to minimize parking impacts to STAPLES Center and other land uses in the area shall be developed, (for example, the provision of permanent or temporary replacement parking). The CMP will be subject to approval by LADOT. In addition, Mitigation Measure No. 4 on page 294 requires that the Project shall participate in the South Park Event Coordinating Committee to coordinate parking management issues.

**COMMENT 3.24**

**DRIVEWAY ACCESS**

This memorandum does not constitute approval of the driveways and parking scheme for the project. Those require separate review and approval and should be coordinated with LADOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 3rd Floor, Station 23) as soon as possible to avoid delays in the building permit approval process.

If you have any questions, please contact Wes Pringle of my staff at (213) 580-5206.

**RESPONSE 3.24**

Refer to Figure 15 of the Traffic Study, Appendix E of the Draft EIR.