LETTER NO. 9

Dated: 2/26/01

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COMMENT 9.1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Los Angeles Sports and Entertainment District in the vicinity of Staples Center, City of Los Angeles.

In the spirit of mutual cooperation through build-out of this project and following our review of the Draft Environmental Impact Report we provide the following comments:

Interstate 10 and the 110 Freeway mainlines and ramps in this area are operating at or near capacity for most of the day. To enable us to more precisely determine the impacts of this project, further study is needed. Please provide a capacity analysis of the AM peak-hour, the PM peak-hour, and daily total traffic for existing and build-out. These needs [sic] to include:

- I-10 freeway mainline
- Eastbound I-10 Hoover Street off-ramp
- Westbound I-10 Los Angeles Street off-ramp
- I-110 freeway mainline
- Northbound I-110 Adams Boulevard off-ramp
- Northbound I-110 Pico Boulevard/Cherry Street off-ramp
- Northbound I-110 9th Street off-ramp

This analysis needs to provide project traffic, cumulative traffic (generated for all approved developments in the area), demand and Level of Service (LOS) at referenced freeway mainline and ramp gore points on the State Highway indicating employees, patrons, existing + project + other projects existing and future for AM, PM and Daily Total.

If you have any question regarding this response, please call me at (213) 897-4429 and refer to IGR/CEQA No. 010133NY.

RESPONSE 9.1

The additional analysis requested has been conducted and is provided as follows. The analysis used the same methodology, trip distribution assumptions, and freeway level of service methodology and criteria for significance as used in Section IV.F.1, Traffic, of the Draft EIR (pages 243 through 249).

A summary of the analysis of the I-10 Freeway mainline and I-110 Freeway mainline is shown in Table 1 and Table 2 on pages 156 and 157 for the AM peak and PM peak, respectively. The complete analysis is provided in Appendix B of this Final EIR. Table 1 and Table 2 show the future without project and future with project traffic conditions at twelve locations on the regional freeway system, including three locations on I-10 and four locations on I-110. This was an expansion of the analysis shown in Table 27 of the Draft EIR and on pages 267 through 268.

The analysis shows that there would be no significant Project impacts at any of the freeway mainline locations in the AM peak hour. Note that due to the particular configuration of land uses in the Project, which are entertainment and evening oriented, the AM peak hour trip generation is only 40% of the PM peak hour. The analysis also indicated that during the PM peak hour there would be no significant impacts at freeway mainline locations other than the two locations already identified in the Draft EIR on SR-110 (see Draft EIR, pages 267 and 268). Impact analysis was not conducted for daily traffic volumes because there is no appropriate criteria for determining significant impacts. While it is meaningful to address peak hour capacity analysis, which address a specific hour of the day (with finite capacity), daily volume/capacity analysis is not meaningful because the daily time period includes twenty four hours and increases in traffic may occur during off-peak hours when surplus capacity exists.

The analysis also addressed the five ramp locations identified in the comment as shown in Table 3 on page 158. Table 3 shows traffic for the future without project condition and future with project condition, for the AM peak and PM peak. It should also be noted that as for the freeway mainline analysis, the Project trip generation totals include all employee trips and visitor/patron trips. This analysis showed that in the AM peak hour there would be no significant project impact at four of the five ramp locations. There would, however, be a significant impact at the northbound SR-110 off-ramp at 9th Street. The V/C ratio at this location would increase from 1.382 to 1.414, which would be an increase of 0.032 and slightly above the 0.02 threshold of significance. This analysis of freeway off-ramps also indicated that there would be no significant Project impacts during the PM peak hour at any of the locations analyzed. The daily traffic conditions are analyzed for the reasons specified earlier.

Table 1
FREEWAY MAINLINE ANALYSIS SUMMARY – AM PEAK HOUR

Freeway Segment	Future Without Project D/C	Future Without Project LOS	Future With Project D/C	Future With Project LOS	Change in D/C	Significant Impact
Northbound/Eastbound						
I-5 East of I-710	1.378	F (2)	1.380	F(2)	0.002	No
I-5 Stadium	0.983	E	0.986	E	0.003	No
I-10 East of La Brea	1.487	F(3)	1.494	F(3)	0.007	No
I-10 West of Vermont	1.487	F(3)	1.493	F(3)	0.006	No
I-10 West of I-710	0.631	C	0.633	C	0.001	No
SR-60 East of Indiana	0.458	B	0.454	B	0.001	No
US-101 North of Vignes	1.487	F(3)	1.488	F(3)	0.001	No
US-101 S of Santa Monica	0.939	E	0.942	E	0.003	No
SR-110 Slauson	1.487	F(3)	1.496	F(3)	0.008	No
SR-110 South of US-101	0.857	D	0.868	D	0.010	No
SR-110 Alpine	0.806	D	0.815	D	0.009	No
SR-110 Pasadena	0.538	B	0.543	C	0.005	No
Southbound/Westbound						
I-5 East of I-710	0.921	D	0.922	D	0.001	No
I-5 Stadium	1.487	F(3)	1.492	F(3)	0.005	No
I-10 East of La Brea	0.378	F(2)	1.383	F(2)	0.005	No
I-10 West of Vermont	1.487	F(3)	1.491	F(3)	0.004	No
I-10 West of I-710	1.014	F(0)	1.017	F(0)	0.002	No
SR-60 East of Indiana	1.487	F(3)	1.490	F(3)	0.002	No
US-101 North of Vignes	0.693	C	0.694	C	0.001	No
US-101 S of Santa Monica	1.487	F(3)	1.492	F(3)	0.005	No
SR-110 Slauson	1.094	F(0)	1.099	F(0)	0.005	No
SR-110 South of US-101	1.487	F(3)	1.505	F(3)	0.017	No
SR-110 Alpine	1.487	F(3)	1.503	F(3)	0.016	No
SR-110 Pasadena	1.487	F(3)	1.495	F(3)	0.008	No

Table 2
FREEWAY MAINLINE ANALYSIS SUMMARY – PM PEAK HOUR

Freeway Segment	Future Without Project D/C	Future Without Project LOS	Future With Project D/C	Future With Project LOS	Change in D/C	Significant Impact
Northbound/Eastbound						
I-5 East of I-710	0.782	D	0.786	D	0.005	No
I-5 Stadium	1.378	F(2)	1.387	F(2)	0.009	No
I-10 East of La Brea	1.597	F(3)	1.611	F(3)	0.014	No
I-10 West of Vermont	1.597	F(3)	1.609	F(3)	0.012	No
I-10 West of I-710	1.105	F(0)	1.109	F(0)	0.004	No
SR-60 East of Indiana	1.378	F(2)	1.382	F(2)	0.004	No
US-101 North of Vignes	0.696	C	0.697	C	0.002	No
US-101 S of Santa Monica	1.487	F(3)	1.496	F(3)	0.009	No
SR-110 Slauson	1.105	F(0)	1.121	F(0)	0.017	No
SR-110 South of US-101	1.597	F(3)	1.629	F(3)	0.033	Yes
SR-110 Alpine	1.597	F(3)	1.626	F(3)	0.029	Yes
SR-110 Pasadena	1.094	F(0)	1.108	F(0)	0.015	No
Southbound/Westbound						
I-5 East of I-710	1.487	F(3)	1.492	F(3)	0.004	No
I-5 Stadium	0.964	E	0.973	E	0.009	No
I-10 East of La Brea	1.487	F(3)	1.503	F(3)	0.015	No
I-10 West of Vermont	1.487	F(3)	1.498	F(3)	0.011	No
I-10 West of I-710	0.703	C	0.707	C	0.005	No
SR-60 East of Indiana	0.576	C	0.581	C	0.005	No
US-101 North of Vignes	1.487	F(3)	1.490	F(3)	0.002	No
US-101 S of Santa Monica	1.378	F(2)	1.387	F(2)	0.009	No
SR-110 Slauson	1.138	F(0)	1.154	F(0)	0.015	No
SR-110 South of US-101	1.487	F(3)	1.523	F(3)	0.035	Yes
SR-110 Alpine	1.487	F(3)	1.519	F(3)	0.031	Yes
SR-110 Pasadena	0.642	C	0.658	C	0.016	No

Table 3
FREEWAY RAMP ANALYSIS SUMMARY

Off-Ramp Location	Future Without Project D/C	Future Without Project LOS	Future With Project D/C	Future With Project LOS	Change in D/C	Significant Impact
A.M. Peak Hour						
EB I-10 @ Hoover	0.678	C	0.695	C	0.017	No
WB I-10 @ Los Angeles	0.875	D	0.909	D	0.034	No
NB I-110 @ Adams	0.231	A	0.231	A	0.000	No
NB I-110 @ Pico Blvd.	0.529	B	0.553	C	0.024	No
NB I-110 @ 9th Street	1.382	F(2)	1.414	F(2)	0.032	Yes
P.M. Peak Hour						
EB I-10 @ Hoover	0.383	B	0.417	B	0.034	No
WB I-10 @ Los Angeles	0.543	C	0.611	C	0.068	No
NB I-110 @ Adams	0.129	A	0.129	A	0.000	No
NB I-110 @ Pico Blvd.	0.530	B	0.579	C	0.049	No
NB I-110 @ 9th Street	0.877	D	0.941	E	0.064	No

A mitigation measure has been identified to address the significant impact in the AM peak hour on the northbound SR-110 off-ramp to 9th Street. The proposed additional mitigation would add signage to the northbound freeway to direct traffic to exit earlier from the freeway rather than driving past the Project to take the 9th Street off-ramp. Refer to Item IV.F.1.f in Section II, Corrections and Additions to the Draft EIR, of this Final EIR. This mitigation measure would direct less traffic to use the SR-110 northbound off-ramp at 9th Street, and more traffic to use the Pico Boulevard northbound off-ramp and the Adams northbound off-ramp. Note also that the off-ramp at Adams Boulevard is also the end of the Harbor Freeway Transitway HOV lanes, so it is likely that more traffic would utilize this ramp than was assumed in the Draft EIR. The Draft EIR analysis conservatively assumed that no project traffic would use the Adams Boulevard off-ramp, and thus should be considered a conservative analysis of the maximum number of trips that would use off-ramps closest to the Project (i.e. SR-110 northbound off-ramp to 9th Street).

It is estimated that the additional mitigation measure would achieve an approximately 40% to 50% reduction of trips using the SR-110 northbound 9th Street off-ramp (reduction of 21 trips in the AM peak hour), and a redistribution of these trips to use the Pico Boulevard off-ramp and the Adams Boulevard off-ramp, both of which have surplus capacity. This would result in the impact at the SR-110 northbound off-ramp at 9th Street in the AM peak hour being reduced to a less than significant level.

It is not expected that the addition of only 21 vehicle trips occurring throughout the AM peak hour on Pico Boulevard, Adams Boulevard, and Figueroa Street, would create any additional significant traffic impacts.