From:	Bescher Éric Pascal <bescher@ucla.edu>
Sent time:	05/30/2020 12:46:50 PM
To:	Mindy.Nguyen@lacity.org
Cc:	mayor.garcetti@lacity.org; councilmember.ofarrell@lacity.org; Daniel.Halden@lacity.org; craig.bullock@lacity.org; alex@mcapus.com; david.ryu@lacity.org; vince.bertoni@lacity.org; kevin.keller@lacity.org
Subject:	Broadway Hollywood Building Public Comments on the Hollywood Center EIR- Traffic Study
Attachments:	Hollywood Center Project - Broadway Hollywood Letter-report.pdf Hollywood Center Project Traffic Study.pdf

Dear Ms Nguyen,

This comment letter supplements our prior submission and includes a copy of the Draft Environmental Impact Report (DEIR) transportation and traffic analysis submitted by experienced traffic engineering professional, Tom Brohard, PE. We agree with his DEIR project traffic analysis and summary that additional study, evaluation, and findings disclosure to the public is required. This analysis must be completed in advance of project approval for the Lead Agency to comply with CEQA's intent to evaluate the project's environmental impacts.

We ask that this report and the attached cover letter be entered in the record, and we await a response.

Sincerely,

Prof. Eric Bescher, Ph.D.
President – Broadway Hollywood Homeowners Association

Vice President, Technology
CTS Cement Manufacturing Co.
12442 Knott St, Garden Grove, CA 92841

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The BROADWAY HOLLYWOOD

May 30, 2020

TO: Department of City Planning
City of Los Angeles
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Attn: Mindy Nguyen, City Planner via Email: Mindy.Nguyen@lacity.org

CC: Eric Garcetti, LA City Mayor (mayor.garcetti@lacity.org)
Mitch O'Farrell, LA City Council Member District 13 (councilmember.ofarrell@lacity.org)
Dan Halden, Director, Heart of Hollywood, Dictrict 13 (Daniel.Halden@lacity.org)
Craig Bullock, Planning Director, District 13, (craig.bullock@lacity.org)
Central Hollywood Neighborhood Council District (alex@mcapus.com)
David Ryu, LA City Council Member District 4 (david.ryu@lacity.org)
Vince Bertoni, Director of City Planning (vince.bertoni@lacity.org)
Kevin Keller, Officer of City Planning (kevin.keller@lacity.org)

RE: Extension of deadline for comments on the Hollywood Center EIR

Dear Department of City Planning:

The Broadway Hollywood Building Homeowners Association opposes this project as it is proposed.

This comment letter supplements our prior submission and includes a copy of the Draft Environmental Impact Report (DEIR) transportation and traffic analysis submitted by experienced traffic engineering professional, Tom Brohard, PE. We agree with his DEIR project traffic analysis and summary that additional study, evaluation, and findings disclosure to the public is required. This analysis must be completed in advance of project approval for the Lead Agency to comply with CEQA's intent to evaluate the project's environmental impacts.

In addition, his analysis supports our general comment that The Hollywood Center (The Project) as proposed would result in significant irreversible direct and indirect transportation and traffic impacts for the Broadway Hollywood Building and its occupants located at the corner of Hollywood and Vine. After reviewing a copy of the attached May 27, 2020 Project DEIR public comment letter and analysis completed by a career California City engineer with 50 years of planning experience, below are the key impact issues that the Broadway Hollywood Building asks the City as the Lead Agency to specifically address:

1) Hollywood/Vine traffic impacts have not been properly studied and specific existing conditions that will potentially significantly impact or block cross streets, alleys, and ingress/egress to the Broadway Hollywood Building one and only vehicle entrance. Increased vehicle and pedestrian activity need to be studied, measured, and monitored for impacts and

The BROADWAY HOLLYWOOD

cumulative impacts that will put an undue burden, with obvious safety issues, on the 96 unit owners, including a commercial restaurant located at the street level. Should findings after study show that there is a significant impact in blockage, it could be a type of city "taking" of access to our building.

2) The analysis concludes that the Transportation Demand Management plan should be required and reviewed PRIOR to the issuance of ANY permits in order to take credits for a program. This is a key issue for our specific concerns. There may not be a TDM that will remedy the blockage of the only vehicle entrance to our building. This may result in a "no project" alternative if significant enough. This analysis should include cumulative impacts that include the recent 2020 "Hollywood Walk of Fame Concept Plan" and the newly installed "scramble" crosswalks at both Hollywood and Vine and Hollywood and Highland. All planning conflicts and contradictions including but not limited to the items outlined in the May 27, 2020 Tom Brohard and Associates letter for vehicle and pedestrian traffic should be resolved prior to any credits are taken and project permits approved by the City.

The Broadway Hollywood Building owners and occupants will be significantly impacted without a TDM plans drafted that include quantified and validated neighborhood traffic management measures that are identified, mitigated and agreed upon with the building's input BEFORE the project is approved and any project permits are issued.

Sincerely,

Eric P. Bescher

Eric Bescher
President – Broadway Hollywood Homeowners Association

Tom Brohard and Associates

May 28, 2020

Eric Bescher, President
Broadway Hollywood Homeowners Association
1645 Vine Street
Los Angeles, CA 90028

SUBJECT: Hollywood Center Project - Draft Environmental Impact Report – Transportation and Traffic Issues

Dear Mr. Bescher:

Tom Brohard, P.E., has reviewed the April 2020 Draft Environmental Impact Report (Draft EIR) and the April 2020 Transportation Assessment for the Proposed Hollywood Center Project bisected by Vine Street just north of Hollywood Boulevard in the Hollywood Community Plan area of the City of Los Angeles. Overall, the Project would contain nearly 1.3 million square feet of developed floor area including 1,005 residential housing units, retail and restaurant uses totaling 30,176 square feet, open space of 166,582 square feet, up to 1,521 vehicle parking spaces, and up to 551 bicycle parking spaces. Four new buildings are proposed including a 35-story building on the West Site, a 46-story building on the East Site, and two 11-story buildings (one on each site) set aside for housing for seniors. The Project also contains a Hotel Option within the East Site, with 220 hotel rooms on Levels 3-12 replacing 104 residential units.

My review disclosed that the Draft EIR and the Transportation Assessment for the Hollywood Center Project are fatally flawed. Several transportation and traffic issues have not been thoroughly or properly studied. This letter points out those deficiencies that must be addressed before considering the Project further.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 50 years of professional traffic engineering and transportation planning experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and have served many diverse communities as the City Traffic Engineer and/or the Transportation Planner. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects as shown in a short summary of my experience in the enclosed resume.

Transportation and Traffic Issues

Based on the information in the Draft EIR and the Transportation Assessment, each of the following traffic issues must be fully addressed and evaluated:

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Phone (760) 398-8885
Email tbrohard@earthlink.net

1) Hollywood/Vine Traffic Impacts Have Not Been Properly Studied – Traffic counts at Hollywood Boulevard and Vine Street of vehicles, bicyclists, and pedestrians were made for the Transportation Assessment on May 23, 2018. Google Earth photographs made on June 8, 2018 as well as the traffic counts made for the Transportation Assessment do not show or consider the diagonal "scramble" crosswalk markings or the "No Right Turn on Red" signing at the intersection installed and then celebrated on August 2, 2018 (see https://www.youtube.com/watch?v=COlpuxNy9c4).

   The Notice of Preparation of the Environmental Impact Report was issued on September 4, 2018. The Transportation Assessment fails to properly study and evaluate the Project traffic impacts at Hollywood/Vine with the "scramble" crosswalks and "No Right Turn on Red" signing that was installed a month earlier. This significant change in the operation of the intersection causes additional congestion, queuing, and delay for vehicles beyond what previously existed without these devices.

   Page 34 of the July 2019 LADOT Transportation Assessment Guidelines requires a quantitative evaluation of the project's expected access and circulation operations. "Project access is considered constrained if the project's traffic would contribute to unacceptable queuing on an Avenue or Boulevard at project driveways or would cause or substantially extend queuing at nearby signalized intersections. Unacceptable or extended queuing may be defined as follows:

   - Spill over from turn pockets into through lanes.
   - Block cross streets or alleys.
   - Contribute to "gridlock" congestion. For the purposes of this section, "gridlock" is defined as the condition where traffic queues between closely spaced intersections and impedes the flow of traffic through upstream intersections."

   Page 12 of the Transportation Assessment identifies Hollywood Boulevard as an Avenue I and Page 13 identifies Vine Street as an Avenue II in the City's Mobility Plan 2035. Queuing has not been evaluated in the Transportation Assessment for Hollywood/Vine before the "scramble" and the "No Right Turn on Red" restrictions were installed or under future scenarios. According to residents living at Hollywood/Vine, queuing has increased substantially since these changes were made.

   The 96 residential units at 1645 Vine Street have only a single alley/driveway that accesses their parking lot from the west side of Vine Street only 160 feet south of Hollywood Boulevard. Traffic on Vine Street has deteriorated with the "scramble" and "No Right Turn on Red" as it is now frequently queued beyond their alley/driveway, blocking turns into

and out of Vine Street. This is a significant safety concern to the residents as well as the City's Police and Fire Departments.

Page 48 of the Transportation Assessment states "There are conditions at specific locations, such as congestion, queuing, and pedestrian activity, where the CMA (Critical Movement Analysis) methodology can be adjusted to more accurately reflect intersection operating conditions at specific intersections. Additionally, the analysis includes several intersections along major thoroughfares that experience heavy congestion during morning and evening peak traffic periods. The congestion along these streets can result in a reduction in the vehicles counted in the peak direction of travel and reduced capacity during peak travel times. Based on field observations, this reduction in vehicle throughput was determined to inaccurately reflect the existing Level of Service (LOS) experienced by motorists at four of the study intersections. At these intersections, the LOS that is presented in the analysis was adjusted to reflect the observed conditions of a worse LOS than was initially calculated using the CMA methodology."

The CMA methodology formerly used by the City of Los Angeles involved an analysis of the critical movements at intersections, essentially the larger sum of the time required by the through movement and the opposing left turn movement in each direction. Depending on the magnitude of the sums without and then with Project traffic added as well as the starting point, traffic impacts were considered significant requiring mitigation, or not. With the recent change in state law involving CEQA (the California Environmental Quality Act), agencies are now required to examine VMT (vehicle miles traveled) as the only measure of significant impacts. The Level of Service (LOS) using the CMA methodology was provided in the Transportation Assessment at several intersections for information but it is no longer used to identify significant traffic impacts.

Calculations in the Transportation Assessment for Hollywood Boulevard and Vine Street, one of the four intersections where LOS adjustments were made, indicate volume to capacity (V/C) ratios of 0.685 and 0.679 respectively in the AM and the PM peak hours for existing conditions in Year 2018. These calculations do not properly account for the "scramble" and "No Right Turn on Red" conditions. Without LOS adjustments, those V/C values equate to LOS B. In Table 6A of the Transportation Assessment, the LOS for both peak hours for Hollywood/Vine was adjusted from B to "F*", with the footnote indicating "* LOS based on field observations since the CMA methodology does not account for vehicular queues along corridors, pedestrians, conflicts, etc. in every case. Thus, the calculated average operating conditions may appear better than what is observed in the field."

Additional time is required for pedestrians to diagonally cross Hollywood Boulevard and Vine Street. Right turns on red are now prohibited in all directions at Hollywood Boulevard and Vine Street. Neither of these measures were properly reflected in any LOS calculations in the Transportation Assessment. None of the calculations properly reflect the impacts of the "scramble" and the "No Right Turn on Red".

In their April 10, 2020 review of the Transportation Assessment, LADOT admits that "...the trips generated by the proposed development will likely result in adverse circulation conditions at several locations. DOT has reviewed this analysis and determined that it adequately discloses operational concerns." Unfortunately, the significant transportation and traffic impacts have not been addressed or mitigated by the Project Requirements, Project Design Features, or other proposed measures.

The Hollywood Center Project is proposed on both side of Vine Street less than 400 feet north of Hollywood Boulevard. With generous credits and unsupported reductions for a Transportation Demand Management (TDM) Program that has not yet been developed or adopted, the Hollywood Center Project is still forecast to generate at least 10,564 daily trips, including 792 trips in the AM peak hour and 1,201 trips in the PM peak hour (Tables 7 and 8 of the Transportation Assessment). At least 60 to 80 percent of the trips for the residential, commercial and hotel portions of the Project will travel through Hollywood Boulevard and Vine Street (Figures 7A, 7B, and 7C of the Transportation Assessment). The additional trips to and from the Hollywood Center Project will cause additional queuing and congestion at Hollywood/Vine above and beyond what already occurs without the Project, making resident vehicular access to and from 1645 Vine Street even more difficult.

In addition to adding many more daily and peak hour trips to the already overburdened conditions at Hollywood/Vine, the Hollywood Center Project will also add many more pedestrian and bicycle trips through that intersection. TDM items, while intended to reduced solo peak hour vehicle trips, will also add significant volumes of pedestrians and bicyclists to the congestion and queuing at Hollywood/Vine.

2) Trip Reductions with TDM Plan Are Overstated and Overemphasized – TDM (Transportation Demand Management) Plans are typically utilized to reduce single occupant vehicle trips during normal worker commute hours. These plans are most effective when most workers leave from or arrive at their residences at the same time. Page 4 of the April 10, 2020 LADOT letter identifies 29 possible TDM strategies, many of which have already been assumed as "given" in the LADOT VMT Calculator.

At this point, there is no TDM Program for the Hollywood Center Project. Instead, LADOT will require that a "...preliminary TDM Program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project." The Transportation Assessment cannot rightfully take credits for a TDM Program that does not exist.

Furthermore, there is no program to periodically monitor the effectiveness of the yet to be developed TDM Program for the Hollywood Center Project. In addition, there are no enforcement provisions for the TDM Program if the trip reduction goals are not achieved. Regular monitoring and enforcement provisions must be added to the TDM Program to ensure that the assumed trip reduction goals are achieved or exceeded.

3) TSM Improvements Have Not Been Quantified – Page 5 of the April 10, 2020 LADOT letter indicates that the Hollywood Center Project will be required to install new conduits and cables to increase capacity for additional CCTV cameras for real-time video monitoring of intersection, corridor, transit, and pedestrian operations in the Hollywood area along portions of Gower Street and Hollywood Boulevard. The letter concludes that these improvements will provide a system-wide benefit by reducing delays experienced by motorists at study intersections. The benefit of these improvements must be quantified.

   The TSM Improvements along Hollywood Boulevard required by LADOT appear to directly conflict with the Hollywood Walk of Fame Concept Plan discussed below. These conflicts and contradictions must be resolved.

4) Benefits of Improvements Must Be Quantified and Validated – Page 3 of the April 10, 2020 LADOT letter indicates that the Project applicant has agreed to fund four measures in the area of the Project under a Development Agreement including:

   a) Implement the Mobility Hub.
   b) Implement bicycle improvements.
   c) TSM improvements.
   d) Construct Neighborhood Traffic Management measures.

   None of these measures are defined to allow reviewers of the Draft EIR to understand the expected benefits that implementation of these measures will provide. Without quantification and further explanation of what these improvements will entail, the value and potential benefit of these offers of financial participation cannot be determined.

5) "Hollywood Walk of Fame Concept Plan" Has Not Been Considered – The January 2020 Concept Plan for the Hollywood Walk of Fame envisions expanding the existing sidewalk on both sides of Hollywood Boulevard between La Brea Avenue and Argyle Avenue from 15' to 25'. Implementation would require the elimination of on-street parking and one travel lane in each direction.

   The Transportation Assessment indicates that conditions for pedestrians on the Walk of Fame along Vine Street will be improved by the closure of six driveways with the Hollywood Center Project, with vehicle access relocated to the side streets instead. However, the Transportation Assessment fails to address or consider impacts associated with the removal of the parking lane and one travel lane in each direction on Hollywood Boulevard.

In summary, the Proposed Project must fully evaluate and disclose the potential traffic impacts and conflicts pointed out in this letter. Further study must be undertaken and more detailed information must be provided in order to properly identify and address the traffic impacts and the scope of the traffic improvements that will be created by the Proposed Hollywood Center Project. If you have questions regarding these comments, please contact me at your convenience.

Respectfully submitted,

Tom Brohard and Associates

Tom Brohard, PE
Principal

Enclosure

Tom Brohard, PE

Licenses: 1975 / Professional Engineer / California – Civil, No. 24577
1977 / Professional Engineer / California – Traffic, No. 724
2006 / Professional Engineer / Hawaii – Civil, No. 12321

Education: 1969 / BSE / Civil Engineering / Duke University

Experience: 50 Years

Memberships: 1977 / Institute of Transportation Engineers – Fellow, Life
1978 / Orange County Traffic Engineers Council - Chair 1982-1983
1981 / American Public Works Association – Life Member

Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California.

Tom has extensive experience in providing transportation planning and traffic engineering services to public agencies. In addition to conducting traffic engineering investigations for Los Angeles County from 1972 to 1978, he has previously served as City Traffic Engineer in the following communities:

- Bellflower ..... 1997 - 1998
- Bell Gardens ..... 1982 - 1995
- Big Bear Lake..... 2006 - 2015
- Indio..... 2005 - 2019
- Huntington Beach ..... 1998 - 2004
- Lawndale..... 1973 - 1978
- Los Alamitos ..... 1981 - 1982
- Oceanside..... 1981 - 1982
- Paramount ..... 1982 - 1988
- Rancho Palos Verdes ..... 1973 - 1978
- Rolling Hills ..... 1973 - 1978, 1985 - 1993
- Rolling Hills Estates ..... 1973 - 1978, 1984 - 1991
- San Fernando..... 2004 - 2019
- San Marcos..... 1981
- Santa Ana ..... 1978 - 1981
- Westlake Village ..... 1983 - 1994

During these assignments, Tom has supervised City staff and directed other consultants including traffic engineers and transportation planners, traffic signal and street lighting personnel, and signing, striping, and marking crews. He has secured over $10 million in grant funding for various improvements. He has managed and directed many traffic and transportation studies and projects. While serving these communities, he has personally conducted investigations of hundreds of citizen requests for various traffic control devices. Tom has also successfully presented numerous engineering reports at City Council, Planning Commission, and Traffic Commission meetings in these and other municipalities.

In his 14 years of service to the City of Indio, Tom accomplished the following:

- Oversaw preparation and adoption of the 2008 Circulation Element Update of the General Plan including development of Year 2035 buildout traffic volumes, revised and simplified arterial roadway cross sections, and reduction in acceptable Level of Service criteria under certain conditions.

- Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Jackson Street and on Monroe Street over I-10 as well as justifications for protected-permissive left turn phasing at I-10 on-ramps, the first such installations in Caltrans District 8 in Riverside County; reviewed plans and provided assistance during construction of both $2 million projects to install traffic signals and widen three of four ramps at these two interchanges under Caltrans encroachment permits.

- Reviewed traffic signal, signing, striping, and work area traffic control plans for the County's $45 million I-10 Interchange Improvement Project at Jefferson Street.

- Reviewed traffic impact analyses for Project Study Reports evaluating different alternatives for buildout improvements of the I-10 Interchanges at Jefferson Street, Monroe Street, Jackson Street and Golf Center Parkway.

- Oversaw preparation of plans, specifications, and contract documents and provided construction assistance for over 70 traffic signal installations and modifications.

- Reviewed and approved over 2,000 work area traffic control plans as well as signing and striping plans for all City and developer funded roadway improvement projects.

- Oversaw preparation of a City-wide traffic safety study of conditions at all schools.

- Obtained $47,000 grant from the California Office of Traffic Safety and implemented the City's Traffic Collision Database System. Annually reviews "Top 25" collision locations and provides traffic engineering recommendations to reduce collisions.

- Prepared over 1,500 work orders directing City forces to install, modify, and/or remove traffic signs, pavement and curb markings, and roadway striping.

- Oversaw preparation of engineering and traffic surveys to establish enforceable speed limits on over 500 street segments.

- Reviewed and approved traffic impact studies for more than 35 major projects and special events including the annual Coachella and Stagecoach Music Festivals.

- Developed and implemented the City's Golf Cart Transportation Program.

Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various development projects. He has provided expert witness services and also prepared traffic studies for public agencies and private sector clients.