

# **Final Traffic Study Review**

## **Ponte Vista Development Project**

**February 2007**

*Prepared For:*

*Northwest San Pedro Neighborhood Council  
Coastal San Pedro Neighborhood Council  
Harbor City Neighborhood Council*

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## 1) Introduction

The proposed Ponte Vista Project is a residential development located in the San Pedro Area of the City of Los Angeles. The project location is on the east side of Western Avenue approximately ½ mile north of Westmont Dr on the site of a former Navy Housing area which consists of 245 existing duplex units. The project site is currently zoned R-1 (low density housing) which would provide for the development of 429 single family homes.

The project developer, Bisno Development Company is proposing a zoning change to R-3 (medium density housing) and the subsequent development of 2,300 town home / condominium (575 senior housing units, 1725 high rise condo units) at a rate of 35 dwelling units per acre. The project also includes development of appurtenant facilities including recreational fields and access to the proposed Mary Star High School. As of December 2006, the Traffic Study for the project has been reviewed and approved by the City of Los Angeles, Department of Transportation (LADOT) and the Environmental Impact Report is in the review and comment period which closes January 31, 2006.

The Northwest San Pedro, Coastal San Pedro, and Harbor City Neighborhood Councils are the community organizations which represent the residents of the community and serve as the voice of the community. Among other functions, they serve to review developments and assure the community issues are addressed by the City and the developer. In December 2006, the aforementioned Neighborhood Councils contracted with Priority Engineering Incorporated to perform a cursory review of the Traffic Impact Study for the Ponte Vista Residential Development Project. The review will focus on the portions of the traffic study affecting the San Pedro, Harbor City, and surrounding areas and will include information about typical traffic studies for reference purposes. The councils expressed concern(s) about the project and the impact(s) it will have on their communities, including the traffic related impacts. The council's primary issues are as follows:

- i) Are the appropriate trip generation rates applied to this project? Specifically, how does 2,300 condo units compare to 429 single family homes in terms of trip generation?
- ii) Have the project impacts been properly identified and assessed? What methodology is used to identify the impacts?
- iii) Are the mitigations proposed in the traffic study realistic and appropriate?

Additionally, after the first draft of the report was distributed, the councils provided PEI with comments via a conference call on the first draft of the report. The councils directed PEI to further investigate and address the project traffic counts and trip generation portions of the traffic study beyond the cursory level of review. As such, additional information has been included in this report and the report has been revised to reflect further investigation.

It is important to understand the role of the lead agency, LADOT, in approval of the traffic study. It is LADOT's responsibility to assure that the project proponent develop a complete and accurate traffic study to assess all current and future impacts of the project and to assure those impacts are properly mitigated. As such, LADOT had developed guidelines (Attachment A) which establish the criteria that all traffic studies should follow. Among other things, LADOT should protect the interest of the residents and to assure development is conducted in a responsible and appropriate manner. It's also important to understand that LADOT must apply it's guidelines to all developments equally and equitably, making no special or unique exceptions for any one developer.

## 2) Traffic Counts

Traffic counts are a critical component of a traffic study. They are the basis on which all calculations of the traffic study are preformed including future year volumes, levels of service, and mitigations. It is important that traffic counts are conducted correctly. Typically, counts are taken on a "routine" day, preferably a Tuesday, Wednesday, or Thursday. Generally, Mondays, Fridays should be avoided as traffic can be inconsistent on these days. Additionally, traffic counts should not be taken on holidays or during times when there is significant interruption to traffic such as construction projects, detours, festivals, etc. Conducting traffic counts at these times is avoided because motorists who typically utilize the intersection do not travel on holidays and will avoid the intersection during times of interruptions which causes congestion.

The peak hour volume counts for the AM peak period should be taken between 7:00 and 9:00 a.m. and the PM peak period counts should be taken between 4:00 and 6:00 p.m. Ideally, all the traffic counts will be taken on the same day or within the same week. However this is often impractical, especially when a project is analyzing a large number of intersections. Sometimes additional intersections are added to a project for analysis and the counts for those intersections have to be taken several months or more after the initial counts.

The traffic counts for the Ponte Vista Project were taken between Tuesday and Thursdays, in April, May, September, and November of 2005. Conducting counts over several months is not ideal, but given that all the counts were conducted between Tuesday and Thursday, the count period is likely acceptable. The AM counts were taken between 7:00 a.m. and 10:00 a.m. and the PM counts were taken between 3:00 p.m. and 6:00 p.m. This exceeds the minimum standard times and likely provides a more accurate identification of the peak hour volumes.

As for other factors affecting the traffic counts, the following statement is included in the traffic study:

*"In early 2005, portions of Western Avenue at Summerland Drive and at Westmont Drive were closed resulting in one travel lane in each*

*direction. It is noted that two travel lanes in each direction on Western Avenue were available to motorists during the weekday when the traffic counts were conducted.”*

These statements indicate that the traffic counts were taken during a time when traffic on Western Avenue was impacted due to partial closures. It also notes that there were “two travel lanes” available in each direction. They seem to imply that even though there were issues affecting traffic flow, the traffic counts weren’t significantly affected and remain valid. Given the importance of traffic counts to a traffic study, the counts need to be validated. One way to validate the counts would be to compare them to other counts taken at the same locations within two years of the count date.

Further research indicates that the traffic counts were likely taken during a time when Western Avenue was significantly impacted by closures due to construction activities. The activities were necessary to address sink holes related to storm drain and/or sewer line construction. It is reasonable to expect that the construction activities had a significant impact on the traffic which utilized Western Avenue. Discussions with residents, Neighborhood council members, and information available from the City of Rancho Palos Verdes indicate that Western Avenue was significantly impacted by these construction projects. The construction activities caused traffic volumes on Western Avenue to decrease as motorists began utilizing the surrounding roads in the area. Residents of the local streets noted significant increases in cut through traffic during this time.

To further assess the adequacy of the traffic counts they were compared to the traffic volume information available on CALTRANS website. For the calendar years 2004 and 2005, the CALTRANS traffic volumes on Western Avenue both north and south of Avenida Apprenda (as well as other intersections) were significantly higher (roughly +/-25%) than the Ponte Vista counts. This reveals that the Ponte Vista traffic counts may be lower than normal, possibly due to the construction activities. Further analysis comes from the Port of Los Angeles (POLA) Transportation Study prepared in April of 2004. The POLA study includes levels of service at several of the Ponte Vista intersections and the levels of service were calculated using the CMA methodology making them comparable to the Ponte Vista Study. In the POLA study, several of the intersections (including Western @ PCH and Westmont) have a worse baseline level of service than the Ponte Vista Study. The cause for the improved LOS is unclear. There is the possibility that motorists simply began to utilize other roadways or that operational improvements were made to the intersections which resulted in improved LOS, but this cannot be verified. It is unlikely that traffic volumes naturally decreased or that the LOS independently improved. Thus, the inconsistency in the LOS further supports the concept that the Ponte Vista counts may underestimate the actual volumes.

Given the inconsistency between the Ponte Vista Traffic Study and the other traffic volume sources, it is recommended that LADOT re-review the traffic counts to assess their adequacy. LADOT may not have been completely aware of the construction

impacts and how they would have affected the traffic counts. If after considering all the factors and inconsistencies, LADOT determines that the counts are accurate then no action is necessary. If LADOT determines that the counts are inaccurate then the intersections will likely have to be re-counted and all the analysis in the traffic study re-done.

### 3) Trip Generation

The LADOT guidelines require that the Institute of Traffic Engineers (ITE) Trip Generation Handbook be utilized to calculate the trips that the project will develop (See page 5 of Attachment A).

*“Use latest edition of ITE's Trip Generation Handbook for trip generation rates/formulas unless project is located in a TSP area in which case the trip rate must be applied according to TSP procedures. If other than latest edition of ITE Trip Generation rates are used, then those rates must first be submitted with appropriate back ground survey data for approval by LADOT.”*

The ITE Trip Generation Manual is widely used and is the accepted industry standard (by most municipalities) for trip generation calculations. When an ITE classification is applied it should match the description of the project and should be consistent with the characteristics of the development. To further assure this consistency, the project variables such as proximity to amenities, public transportation, and schools may be considered when determining which ITE classification best fits the project. Additionally, some of the ITE rates have other similar and related rates that can be used when the project doesn't fit into a specific classification or better fits into another classification based on it's characteristics. Finally, each classification contains information regarding the number of studies (data points) utilized to determine the rate. Caution is recommended when the number of data points is small. Specifically, if 1-2 points are studied then a local data should be collected, if 3-5 data points then local data collection is encouraged (not required), 6+ data points provides for the rate to be directly utilized. A jurisdiction may want to consider the location of the data points, sometimes the data points are the result of studies at locations far from the project location.

Some jurisdictions have developed and require use of their own trip generation tables such as San Diego County and the City of San Diego. Other jurisdictions may require a mixed use of the ITE Manuals and their own special trip tables for special uses, such as the County of Los Angeles.

The proposed condominiums and senior housing are classified as high rise condominiums (232) and senior housing-attached (252) respectively. The description of each type of development does fall within the description in the ITE Trip Generation Manual (See Attachment B for ITE Classification sheets). It should be noted that the high rise condominium classification has a small number of data points

(4-5) and the points were at locations mainly on the east coast of the United States. Also, there are other related classifications which are similar to the high rise condominium and could be used as the trip generation classification for this project. These classifications include residential condominium/townhouse (230), low rise condominium/townhouse, and luxury condominium/townhouse (233). More accurate trip generation rates could likely be determined by performing a local data collection as described in the ITE Trip Generation Manuals.

<b>Ponte Vista Trip Generation Summary</b>			
<b>Zoning</b>	<b>ADT Trips</b>	<b>AM Trips</b>	<b>PM Trips</b>
<b>Current Zoning R-1 (Low Density Residential)</b>			
Single Family Detached Housing (210)	4,106	322	433
<b>Proposed Zoning R-3 (Medium Density Residential)</b>			
High Rise Condominiums (232)	7,211	587	656
Senior Adult Housing-Attached (252)	2,001	46	63
	9,212	633	719
<b>Other Possible ITE Trip Generation Rates for Project</b>			
Mid Rise Apartment (223)		518	673
Senior Adult Housing-Attached (252)		46	63
Total		564	736
Residential Condominium/Townhouse (230)	10,109	759	897
Senior Adult Housing-Attached (252)	2,001	46	63
Total	12,110	805	960
<b>Trip Generation Rates - Other Jurisdictions</b>			
<b>SANDAG - County of San Diego</b>			
<b>Zoning</b>	<b>ADT Trips</b>	<b>AM Trips</b>	<b>PM Trips</b>
<b>County of San Diego</b>			
Single Family Detached	4,290	343	429
Apartment	10,350	828	932
Retirement Community	2,300	115	161
Total	12,650	943	1,093
<b>City of San Diego</b>			
Single Family Detached Urbanizing Area	4,290	343	429
Multiple Dwelling Unit - Over 20 DU/ac	10,350	828	932
Retirement Community	2,300	115	161
Total	12,650	943	1,093

<b>Ponte Vista Trip Generation Summary</b>			
<b>Zoning</b>	<b>ADT Trips</b>	<b>AM Trips</b>	<b>PM Trips</b>
<b>County of Los Angeles</b>			
Single Family Detached Housing	4,106	322	433
Condominium/Townhomes	13,800	N/A	N/A
Senior Adult Housing-Attached (252)	2,001	46	63
<b>Total</b>	<b>15,801</b>	<b>46</b>	<b>63</b>

The developer suggests that the increase in trips can be mitigated; this will be further analyzed in the mitigation section of this report. Also, it should be noted that the trip generation rates of other agencies result in a greater number of trips than those calculated using ITE rates.

It is important to understand that the LADOT’s requirement that ITE rates be utilized is an accepted industry standard and is appropriate. Furthermore, review of other Traffic Studies and EIR’s indicates that LADOT consistently requires all project proponents and developers to utilize ITE Trip Generation Rates. There is some variance within which ITE rate is utilized in regards to condominiums. Some projects utilize ITE classification 230, whereas others utilize ITE classification 232. It is unclear why the different rates are utilized other than the assumption that the project description best fits each particular classification. Requiring the developer to utilize a different rate than that which best fits the project description would be inconsistent with LADOT’s standard policy and might be an imposition of a special requirement on this developer which is generally prohibited.

#### 4) Trip Distribution

The project trip distribution is the prediction of where the project “generated” trips are destined to go. The distribution is generally expressed in percentages, meaning a certain percentage of the project trips will go in a certain direction. The general industry accepted practice is utilizing existing traffic patterns as well as proposed land uses to determine the distribution percentages. As such, it is often difficult to develop a precise calculation to determine the percentages. Often the percentages are developed through consultation between the engineer preparing the traffic study and the local municipality representative(s) based on the aforementioned factors.

The traffic study states “The traffic distribution pattern was based on the proposed project land uses, the existing and planned project site access schemes, existing traffic patterns, characteristics of the surrounding roadway system, and nearby population and employment centers”. This is a reasonable methodology to develop the trip distribution percentages and considers more factors than are typically utilized, and as such, is likely a better representation of trip distribution than simply existing traffic patterns. The project trip distribution generally sends 66% of the traffic to and from

the north and 33% to and from the south of the project site. A review of the traffic counts indicates that these percentages are within reasonable limits and generally follow the existing traffic patterns. Additionally, the traffic study indicates that the distribution percentages were developed in consultation with LADOT and have been reviewed and approved by LADOT.

## 5) Project Impacts

To understand the project's impacts, it is first necessary to understand the methodology through which impacts are assessed. Each part of this section begins with a brief description of how a typical traffic study is prepared. Traffic studies generally utilize the following procedure to determine impacts:

- Determine the scenarios to be analyzed.
- Identify the facilities (intersections and roadways) to be analyzed.
- Apply a standard analysis methodology to evaluate the facilities.
- Identify the impacted facilities based on thresholds of significance.
- Identify mitigations to completely offset the significant impacts.

### A) Scenarios

A typical traffic impact study will include an analysis of the proposed project's impacts on the following scenarios:

- Existing Conditions
- Existing Conditions plus related projects
- Existing Conditions plus related project plus the proposed project
- Future Year Conditions
- Future Year Conditions plus related projects
- Future Year Conditions plus related project plus the proposed project
- Existing/Future Year Conditions with all projects and mitigations

Occasionally an agency will require a "near-term" condition analysis if deemed necessary by that agency.

Within each scenario the one hour AM and PM peak periods are analyzed on a typical weekday. The one hour peak period is the one hour of largest volume of traffic. The AM period is typically between 7 and 9 a.m. and the PM period is typically between 4 and 6 p.m. Occasionally a jurisdiction will require other time periods or days to be analyzed including midday peaks and weekends. LADOT requires the existing condition and future conditions be analyzed as indicated on page 8, Section F, part 2 of Attachment A.

*2. V/C ratios should be calculated to "3" decimals and summarized in a table showing weekday AM and PM peak hour LOS at study intersections for existing conditions, future without project, future*

*with project and future with project plus mitigation. Attach in a separate appendix detailed work sheets for each study intersection.*

The scenarios analyzed in the traffic study are existing, future year, future year plus related projects, future year plus related project and the proposed project, and future year plus all projects and mitigations. AM and PM peak periods on weekdays are analyzed as well as midday peak on Saturdays.

## B) Impacted Facilities

A project's impacts are assessed and evaluated based on the generated trips, the distribution, and the analysis procedures set forth by the jurisdictional agency. Once the project trips are distributed, the jurisdictional agencies criteria for identifying the affected facilities (intersections, roadways, freeways, etc.) are utilized to identify exactly which facilities require analysis. Generally if a intersection will experience 50 or more peak hour trips and a roadway will experience 500 or more daily trips then it must be analyzed. To identify the affected facilities, LADOT utilizes the following criteria (see pages 1-2 of Attachment A):

*LADOT shall do an initial assessment of the project to determine if a traffic study is required. Generally, a traffic study may be required if:*

- 1. The project is likely to add 500 or more daily trips or likely to add 43 or more PM peak hour trips and,*
- 2. The project is likely to significantly impact nearby intersection(s) which are presently believed to be operating at LOS C, D, E or F.*

LADOT's requirements appear to be more stringent than the industry standard and thus more facilities will have been analyzed. A total of 52 existing and future intersections were analyzed along with 4 roadway/freeway segments. The intersections are in a number of jurisdictions, including the Cities of Los Angeles, Torrance, Lomita, and Rancho Palos Verde as well as the County of Los Angeles.

## C) Evaluation Methodology

Once the potentially affected facilities are identified, they must then be analyzed to determine the impacts on the facility. LADOT requires use of the Critical Movement Analysis (CMA) method to analyze an intersection. The CMA is one of several standard analysis methods and is based on a comparison of the volume of traffic traveling through the intersection divided by the capacity of the intersection. In lay terms, how many cars will travel through the intersection divided by how many cars the intersection can accommodate, the capacity of the intersection is based on the number of lanes of all types. This is referred to as the

volume over capacity (v over c (v/c) ratio). The specific LADOT requirement is shown below and on page 7 of Attachment A.

*“the Transportation Research Board Critical Movement Analysis (CMA), Circular 212 Planning Method, shall be used to analyze traffic operating conditions at study intersection(s). CMA is a method which determines the volume to capacity (V/C) ratio on a critical lane basis and Level of Service (LOS) associated with each V/C ratio at a signalized intersection. V/C ratios are measured on a scale of 0 to 1.000. LOS describes the quality of traffic flow and is a measure of such factors as travel speed, travel time and flow interruptions. LOS range from "A" to "F" with LOS "A" representing excellent, free flow conditions and LOS "F" representing jammed, forced flow conditions. See following table for a description of LOS and associated V/C ratios.”*

Once the v/c ratio has been calculated, it is then associated to a “level of service” which indicates how the facility will operate based on the v/c ratio. Level of Service is generally a letter from A to F, with A being the highest (least congested) level of service and F being the lowest (most congested). See the following table (page 8 of Attachment A) from for further detail of LOS.

**LEVEL OF SERVICE  
DEFINITIONS FOR SIGNALIZED INTERSECTION<sup>1</sup>**

<u>Level of Service</u>	<u>Volume/Capacity</u>	<u>Ratio Definition</u>
A	0.000 - 0.600	<b>EXCELLENT</b> - No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	<b>VERY GOOD</b> - An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	<b>GOOD</b> - Occasionally, drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	<b>FAIR</b> - Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	<b>POOR</b> - Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.

**LEVEL OF SERVICE  
DEFINITIONS FOR SIGNALIZED INTERSECTION<sup>1</sup>**

<u>Level of Service</u>	<u>Volume/Capacity</u>	<u>Ratio Definition</u>
F	Greater than 1.000	<i>FAILURE - Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.</i>

<sup>1</sup>Source: Transportation Research Board, *Interim Materials on Highway Capacity*, Transportation Research Circular No. 212, January 1980.

The traffic study utilizes the CMA methodology (See Attachment E) to analyze all the intersections in the City of Los Angeles. Other similar methodologies are utilized to analyze the intersections in the other jurisdictions. Attachment C contains LOS analysis sheets from the traffic study. The results of this analysis are discussed in Section E.

D) Thresholds of Significance

In order to determine the significant of the impacts, a jurisdiction establishes thresholds of significance so that the severity of an impact can be properly determined. Thresholds of significance vary from jurisdiction to jurisdiction. LADOT has determined that the following increases in a v/c ratio determine if a impact has to mitigated. LADOT’s thresholds are comparable if not more stringent then other jurisdictions.

***SIGNIFICANT TRANSPORTATION IMPACT***

<u>Level of Service</u>	<u>Final V/C Ratio</u>	<u>Project-Related Increase In V/C</u>
C	> 0.700 - 0.800	<i>equal to or greater than 0.040</i>
D	> 0.800 - 0.900	<i>equal to or greater than 0.020</i>
E, F	> 0.900	<i>equal to or greater than 0.010</i>

The following thresholds of significance are for roadways:

<b><i>Projected Average Daily Traffic with Project (Final ADT)</i></b>	<b><i>Project-Related Increase In ADT</i></b>
0 to 999	<i>16 percent or more of final ADT*</i>

<i>1,000 or more</i>	<i>12 percent or more of final ADT</i>
<i>2,000 or more</i>	<i>10 percent or more of final ADT</i>
<i>3,000 or more</i>	<i>8 percent or more of final ADT</i>

*\* For projects in West Los Angeles Transportation Improvement and Mitigation Specific Plan area, use 120 or more trips*

The results of the analysis as compared to the thresholds of significance are discussed in Section E.

#### E) Project Impacts

A project's impacts are determined by assessing the baseline conditions and comparing the increase in v/c ratio to the baseline plus project (and related projects) conditions. The increase in v/c is compared to the threshold of significance to determine if the impact is significant. If the increase in v/c ratio is greater than the allowable increase then an impact is significant and must be mitigated, if it is less than the allowable increase then the impact is not deemed significant.

Based on the LOS Calculation sheets (included in Attachment C), which are based on the Ponte Vista traffic counts, the proposed project will result in significant impacts to 24 of the 52 intersections. The specific intersections are identified in Column 4b of the tables in Attachment C. The v/c ratios are correctly calculated and the analysis also includes the addition of the Mary Star High School as well as numerous related projects in the impact analysis. It should be noted that a significant number of the intersections along Western Avenue will operate at LOS E or F in the baseline condition in 2012, regardless of the project. Additionally, a significant number of these intersections are in other jurisdictions other than the City of Los Angeles, specifically the City of Rancho Palos Verdes. These impacts are based on the Ponte Vista traffic counts and the impacted intersections may change if other counts are utilized.

#### 6) Mitigation

##### A) Traffic Study Mitigations

There are numerous types of mitigations available to offset a project's impacts. These mitigations include but are not limited to:

- Operational improvements – these are improvements to the operation of an existing traffic signal, including:
  - Synchronizing a series of traffic signals

- Adjustments to the signal timing (more green time, right turn overlap)
- Installation of traffic signal monitoring and control equipment
- Physical Improvements – these are improvements through construction of new roadway improvements, including:
  - Re-striping an existing intersection (adding or adjusting lane types)
  - Adjusting lane widths
  - Adding lanes (through, right or left turn lanes, widening)
  - Addition of medians
  - Installation of a traffic signal

## B) LADOT Mitigations

The LADOT has numerous types of physical, operational, and other types of mitigations available to developers and these mitigations are indicated on pages 11-13 of Attachment A. One of the operational mitigations is the implementation of the Automated Traffic Surveillance and Control (ATSAC) and the Adaptive Traffic Control System (ATCS) which the traffic study identifies that LADOT indicates will provide 7% and 3% (10% cumulatively) in improved operational efficiency. It should be noted that this is a theoretical value and that any use of this mitigation should be monitored after installation to assure it is actually offsetting the impact. Installation of the ATSAC/ATCS system would likely be a benefit for the area residents as they will receive a 24/7 system that will continually adjust signal operations to provide for the maximum efficient traffic flow especially in times of heavy traffic or unexpected congestion. Ultimately, the mitigations must satisfy LADOT and its residents and it is LADOT's responsibility to assure the mitigations properly offset the impacts from an analytical and residents standpoint(s).

## C) Traffic Study Mitigations

The Traffic Study identifies numerous mitigations to offset the project impacts as shown in Attachment D. The mitigations are accurately calculated and would likely offset the identified impacts of either the existing or proposed zoning if the mitigations perform as identified. The mitigations include both operational and physical improvements.

### i) Physical Mitigations

The physical mitigations consist of addition of lanes, re-striping, and installation of signals. These mitigations are straightforward, and appear reasonable as long as they are designed and constructed in accordance with the jurisdictional agencies standards. The developer should identify all changes to the existing intersection geometry including but not limited to storage lengths, lane widths, signage, and traffic controls. Additionally, the

City should coordinate the changes with the local community groups prior to any approval.

ii) Operational Mitigations

The operational mitigations consist mainly of installation of ATSAS/ATCS system at numerous intersections. These mitigations are calculated correctly according to LADOT's operational enhancement guidelines and theoretically would offset the projects impacts as shown in Attachment's C and D. LADOT allows this mitigation as follows: (see Page 12 of Attachment A)

*“ATSAC is available as a mitigation measure only where ATSAC has not yet been constructed and a fully-funded contract has not been awarded for ATSAC construction. ATSAC may be accepted as a mitigation measure prior to the completion of the ATSAC project's final funding report (Final Report) at the sole option of LADOT.”*

It is important to understand that LADOT already has plans to implement installation of the ATSAC/ATCS system at these intersections and may have already secured funding either through City or Grant Funds. These improvements were proposed in the Western Corridor Improvement Project prepared by the Joint Regional Western Avenue Task Force comprised of representative of LADOT, CALTRANS, and the City of Rancho Palos Verdes. It is unclear whether a “fully-funded contract” or a “final funding report” has been completed. However, it is within LADOT's purview to accept or reject this mitigation regardless of the status of funding, especially considering that LADOT has indicated to the community that they already have plans to install this system.

The community has the reasonable expectation that these signals will be upgraded to the ATSAC/ATCS system regardless of any development. By allowing the developer to use this mitigation LADOT is essentially shifting the financial burden from the LADOT to the developer. This enables LADOT to potentially utilize funds already committed on being utilized in the community for other purposes and/or in other unrelated areas. This would be a loss for the community as it expects the installation of the ATSAC/ATCS system **PLUS** mitigations from the project to offset the project impacts.

The developer should perform a re-analysis of the intersections assuming that the ATSAC/ATCS system has been installed and subsequently develop implement “alternate mitigations” at each impacted location. Alternately, the developer could be permitted to place funds equal to installation of the ATSAC/ACTS system into a trust account that may be utilized for the future widening of Western Avenue (a measure recommended by the Western Avenue Task Force) or possibly the construction of landscaped medians or landscaping along the sidewalks and /or other physical improvements.

It is also important to note that some mitigation(s) are under the jurisdiction of other agencies, CALTRANS or other municipalities and must be acceptable to them. Their acceptance must be provided prior to implementation of the project. The other agencies may not accept the developers mitigations and may require more (or less) of the developer to offset a mitigation.

#### D) Mitigation Monitoring

An appropriate mitigation plan fully funded by the developer must be a part of installation of the ATSAC/ATCS system and other mitigations. It should consist of the following:

- i) The monitoring consists of routine traffic counts (or some other routine data gathering) after installation and analysis of the volume data and performance of the signals to verify if the operational enhancements are being achieved.
- ii) The developer should identify “alternate mitigations” that would be implemented if the proposed mitigations do not offset the impacts.
- iii) The plan should also include the developer placing funds equal to that necessary to implement the “alternate mitigations” in a trust fund or mitigation bank account that may be used to implement the alternate mitigations.
- iv) If after some agreed upon time period after construction of the final development the initial mitigations are verified as effective, then the funds would be returned to the developer.

#### 7) Summary and Recommendations

##### A) Summary

PEI was contracted to conduct a cursory review of the Ponte Vista Traffic Study. The trip generation, trip distribution, and analysis methodologies were all prepared in compliance with the LADOT guidelines. There appears to be inconsistencies with the traffic counts when compared to other sources of traffic volumes. The City of Los Angeles should re-review the traffic counts to determine their accuracy and subsequently take the appropriate action. The condominium and senior housing do wall within the ITE descriptions for High rise condominium and senior housing-attached. There are other trip generation classifications which could be used for the project. That said, it would be most accurate to perform a local data collection to determine trip generation rates for the San Pedro Area.

LADOT is in allowing the developer to provide funding for the installation of the ATSAC/ATCS system as mitigation for numerous impacts. However, the LADOT has already committed to funding installation of the ATSAC/ATCS system at these locations. Allowing these mitigations will deprive the community

of additional mitigations it is entitled too. The developer should be required to install “alternate mitigations” other than installation of the ATSAC/ACTS system. One such mitigation would be to place funds equal to that of installing the ATSAC/ACTS into a trust fund to be utilized for the widening of Western Avenue.

## B) Recommendations

Based on the review of the traffic study and discussions with the Neighborhood Council representatives, the following recommendations have been developed:

- i) The Neighborhood Councils develop a group of stakeholders affected by this project to form a unified voice regarding this project. These stakeholders would consist of Neighborhood Council members, City representative(s), business members, other community groups, etc.
- ii) The Neighborhood Councils gain their City Councilpersons support on these issues prior to any contact with LADOT.
- iii) The Neighborhood Councils send a letter to LADOT signed by all Council Presidents and the City Council Person expressing their concerns and recommendations. It is recommended that the letter contain the following recommendations:
  - (1) Re-review the traffic counts for the project utilizing other sources of information to determine their accuracy.
    - (a) If the City of Los Angeles determines the counts are accurate then no further action is necessary.
    - (b) If LADOT determines the counts are in-accurate, then the counts will likely have to be re-done and the traffic study revised to reflect the new counts.
  - (2) Consider requiring the developer to perform a local trip generation data collection to determine the most accurate trip generation rate to be utilized for the project.
  - (3) Reject the developer’s use of installation of the ATSAC/ACTS system as mitigation.
  - (4) Require the developer to do one of the following:
    - (a) Re-analyze the intersections as if the ATSAC/ACTS system has been installed develop alternate mitigations based on this analysis, and fund “alternate mitigations” that offset the impacts. –OR–
    - (b) Place funds equal to installation of the ATSAC/ACTS system in a trust fund to be utilized for mitigations as the Community and LADOT jointly decide.
    - (c) If the re-analysis or trust fund can’t be established, reject the project.
  - (5) Develop, implement and fund a Mitigation Monitoring system which would:
    - (a) Monitor the impacted facilities to verify if the operational enhancements are being achieved.

- (b) Developer should identify “alternate mitigations” that would be implemented if the proposed mitigations do not offset the impacts.
- (c) Place funds equal to that necessary to implement the “alternate mitigations” in a trust fund or mitigation bank.