

**HIGHLIGHTS OF THE TRAFFIC STUDY
FOR THE PROPOSED
PONTE VISTA PROJECT**

**PREPARED FOR THE
PONTE VISTA WORKING GROUP
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I. Introduction

Linscott, Law & Greenspan Engineers (LLG) is the consulting traffic engineer for the Ponte Vista project, and prepared the Traffic Study for the project under the supervision of the City of Los Angeles Department of Transportation (LADOT). This memorandum is intended to assist the Ponte Vista Working Group in its consideration of traffic and transportation issues by summarizing the methodology used in preparation of the Traffic Study, highlighting its key conclusions, and by providing useful observations for the Working Group's consideration.

II. Traffic Study Methodology

The Traffic Study was prepared in accordance with LADOT's adopted policies, procedures and standards. LADOT is responsible for the final determination of the potential traffic impacts of the project and recommended traffic mitigation measures.

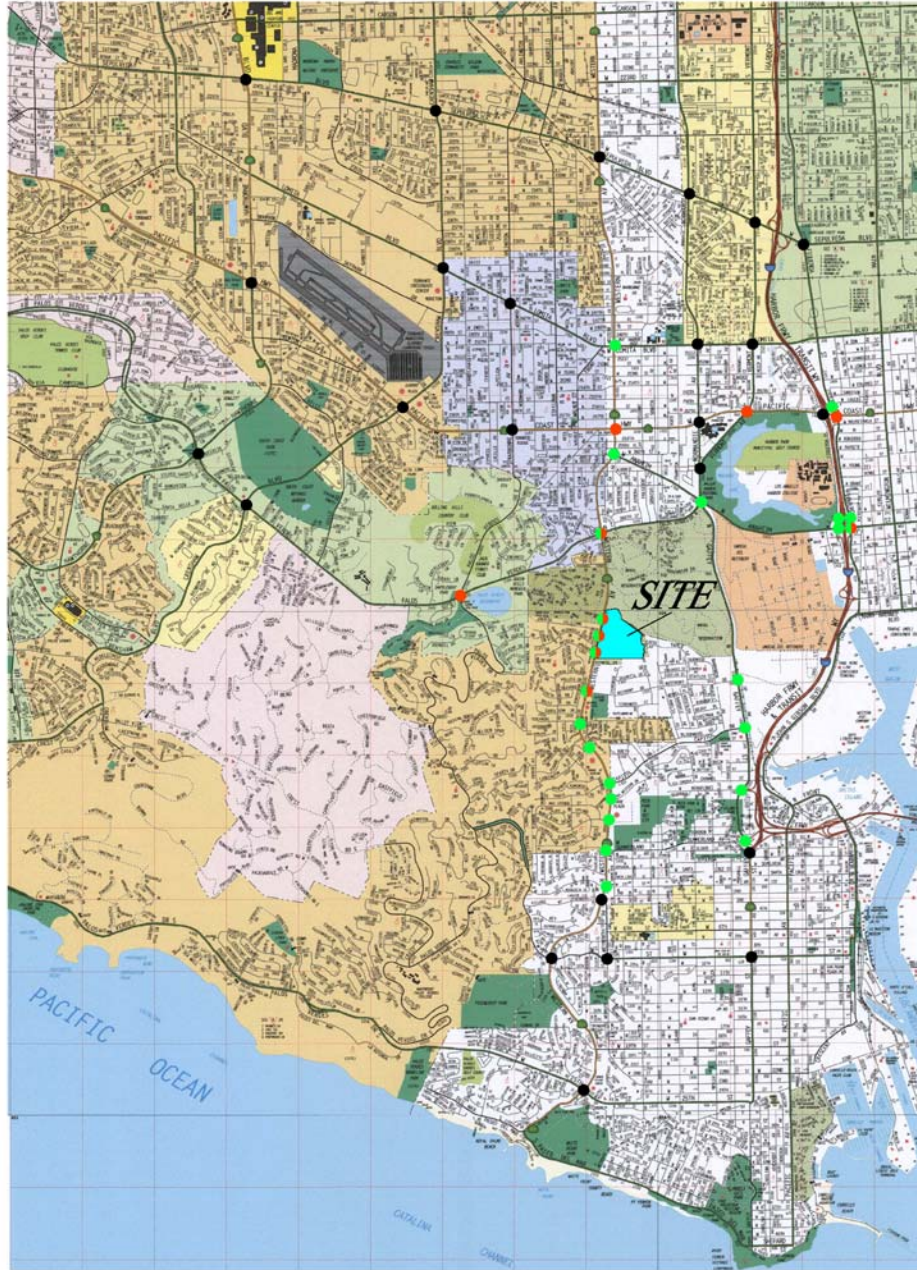
A. Study Intersections

The Traffic Study utilizes a number of methodologies for evaluating potential traffic and transportation impacts. The principal methodology is to evaluate traffic impacts based on a review of intersection impacts. LADOT's methodology focuses on intersections because they are the points in the City's street network where congestion is most likely to occur and, therefore, are where the additional traffic generated by the project would have its greatest potential to cause adverse effects.

Following consultation with LADOT and based on input received during the public scoping process, 52 area intersections were designated for study. The study intersections cover a wide geographic region include intersections located in the City of Los Angeles, City of Rancho Palos Verdes, and other nearby communities. A map depicting the location of the study intersections appears below as Figure A.

Figure A

STUDY INTERSECTIONS



MAP SOURCE: THOMAS BROTHERS MAPS

LEGEND FOR STUDY INTERSECTIONS

- LESS THAN SIGNIFICANT IMPACT
- MITIGATION BY TRAFFIC SIGNAL IMPROVEMENTS (E.G., ATSC/ATCS)
- MITIGATION BY PHYSICAL IMPROVEMENTS (E.G., ROADWAY WIDENING, RESTRIPING)
- MITIGATION BY TRAFFIC SIGNAL IMPROVEMENTS AND PHYSICAL IMPROVEMENTS

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PONTE VISTA AT SAN PEDRO

Each of the 52 study intersections was examined using the traffic analysis procedures and significant impact thresholds adopted by the City of Los Angeles. In addition, although not required by LADOT policy or CEQA, for those intersections located outside the City of Los Angeles, the Traffic Study supplements the City's analysis with analysis based on the procedures and methodologies utilized by the city in which the intersection is located. Thus, for example, intersections in the City of Rancho Palos Verdes were examined using the traffic impact analysis methodologies of both the City of Los Angeles and Rancho Palos Verdes.

B. Peak Hour and Existing Conditions

Traffic congestion is at its greatest levels during what is known as the "peak" hour of traffic, i.e., the one-hour segment when the most people are commuting to and from work. Because these periods represent the highest potential for significant traffic impacts caused by new development, potential project impacts to intersections were analyzed at the weekday morning and evening "peak" hour of traffic.

In order to identify the morning and evening "peak" hour for each intersection, traffic counts were taken at the 52 study intersections during the weekday morning and afternoon commuter peak hours (7:00 to 10:00 a.m. and 3:00 to 6:00 p.m.). Additional counts were taken at intersections along Western Avenue during a Saturday midday peak period (12:00 to 3:00 p.m.). The peak one-hour segment (e.g., 7:30-8:30 a.m.) was determined for each study intersection for both AM and PM. Traffic counts were conducted in 2005 while local schools were in session.

C. Future Pre-Project Conditions

At the time the project is completed and occupied, it is likely that additional traffic may be added to the street network from sources such as other projects and job growth. Therefore, the Traffic Study estimates future pre-project traffic conditions in accordance with LADOT policies and procedures to provide a baseline against which the project's traffic impacts can be assessed. The Traffic Study uses 2012, the year the project would be expected to be built out, as the future baseline date.

To forecast year 2012 pre-project conditions, the Traffic Study utilizes two separate, though overlapping, techniques in accordance with LADOT practices and policy. First, the Traffic Study assumes that traffic will grow by a factor of 1% each year until 2012 when the project is completed. The source of the 1% annual growth factor is the Metropolitan Transportation Authority (MTA), through its computer traffic modeling efforts prepared for subregions of Los Angeles County, including the South Bay/Harbor area. Second, in addition to the 1% annual growth factor, the Traffic Study also assumes the build-out of all identified "related" development projects proposed in Los Angeles and other nearby communities in the vicinity of the Ponte Vista project. As a result of the scoping process, 175 "related" projects are considered in the Traffic Study. See Table IV.J-9 in the Draft EIR for a list of the related projects. Finally, in accordance with LADOT practice and policy, the Traffic Study assumes that the "related" projects

will not be accompanied by any traffic mitigation measures. In actuality, however, most major projects are accompanied by traffic mitigation because of the requirements of CEQA. The intention of this methodology is to provide a "worst case" scenario against which to assess potential traffic impacts and identify mitigation measures. However, as discussed below, in the opinion of LLG, this methodology is likely to significantly overstate future traffic conditions in the vicinity of the project. See Section III.E., below.

D. Trip Generation and Impact Thresholds

The Traffic Study's forecast of project traffic is based on rates recommended in the *Trip Generation* manual published by the Institute of Transportation Engineers (ITE). The ITE developed these trip rates based on traffic counts conducted at existing development sites (e.g., existing condominium complexes, existing senior residential facilities, etc.). See Table IV.J-7 in the Draft EIR for the Ponte Vista trip generation forecast.

The Traffic Study identifies intersection "impacts" based on the City's adopted thresholds of significance. These thresholds of significance are determined by acceptable Volume-to-Capacity ratio (v/c ratio) increases for intersections that function at different Level of Service (LOS). The City's thresholds of significance are set forth in Table I below:

Table I

CITY OF L.A. INTERSECTION IMPACT THRESHOLD CRITERIA		
LOS	Final V/C	Project-Related V/C Increase
A and B	Not applicable	Not applicable
C	0.701 – 0.800	Equal to or greater than 0.040
D	0.801 – 0.900	Equal to or greater than 0.020
E and F	0.901 or greater	Equal to or greater than 0.010

III. Highlights and Observations Regarding the Ponte Vista Traffic Study¹

A. Project Impacts

Traffic Study concludes that the project would create significant traffic impacts at 23 intersections (prior to consideration of traffic mitigation) during the weekday AM and PM peak hours.

During the Saturday midday peak hour, the project is expected to create significant traffic impacts at 10 intersections (again, prior to mitigation). Nine of these intersections are the same locations that would be impacted during the weekday AM and/or PM peak hours.

¹ The Draft Environmental Impact Report (DEIR) for Ponte Vista discusses traffic in Section IV.J, Transportation and Traffic. The Traffic Study itself is contained in Appendix IV.J-1 of the DEIR.

B. Mary Star of the Sea High School Impacts

As a community benefit, the Ponte Vista project proposes to provide vehicular access through its site to serve the proposed Mary Star of the Sea High School in order to enable school-related traffic to avoid impacting the Taper Avenue neighborhood. The Mary Star of the Sea High School is not part of the project, and was previously approved by the City of Los Angeles. Nonetheless, the Traffic Study considers the Mary Star High School traffic impacts along with the Ponte Vista development, resulting in 2 additional intersections being significantly impacted during the weekday AM and/or PM peak hours.² The Traffic Study also concludes that Mary Star of the Sea High School traffic would result in significant impacts even if the Ponte Vista project were not built.

C. Traffic Mitigation Measures

The Traffic Study identifies mitigation measures that mitigate all of the significant impacts of the project. The applicant proposes to fund all off-site mitigation measures before building permits are issued to construct any residential building within the project. Accordingly, mitigation measures for the entirety of the 2,300 units proposed should be in place well-before the project is completed.

1. Western Avenue Task Force Recommendations. In developing the recommended traffic mitigation measures, the Traffic Study relied extensively on the work of the Western Avenue Task Force. The Western Avenue Task Force was a working group of residents and technical staff from the Cities of Los Angeles and Rancho Palos Verdes charged with studying and recommending transportation improvements for Western Avenue. In the summer of 2005, the California Department of Transportation (Caltrans), which oversaw the Task Force, issued a report based on the group's recommendations. The Traffic Study incorporates the key recommendations from the Western Avenue Task Force report as mitigation measures for the project, as discussed below.

2. Traffic Signal Synchronization (ATSAC/ATCS). Based on the recommendations of the Western Avenue Task Force, the Traffic Study proposes the traffic signal synchronization system known as ATSAC (Automated Traffic Surveillance and Control), as well as its more recent upgrade ATCS (Adaptive Traffic Control System), as its primary mitigation strategy.

ATSAC and ATCS provide for the immediate exchange of information and instructions through the use of traffic sensors and fiber optic cables connecting to a central computer system, which enables traffic signals to respond in a real time manner to changes in traffic conditions. Intersection cameras also allow engineers to visually monitor operations and respond to problems. The result is that ATSAC/ATCS equipped intersections are able to move a higher capacity of vehicles in a shorter time. The Western Avenue Task Force report estimates that this computerized synchronization will

² Mary Star High School is not expected to result in significant traffic impacts at any intersections during the Saturday midday peak hour.

improve the calculated Levels of Service (LOS) at intersections in the Western Avenue corridor by an average of 12 percent.

The Western Avenue Task Force report recommended the installation of traffic signal synchronization such as ATSAC/ATCS at 16 existing signalized intersections on the Western Avenue Corridor between Palos Verdes Drive North and 25th Street. Based on the project's potential impacts, the Traffic Study recommends the funding of ATSAC/ATCS at 24 intersections, including 11 of the 16 intersections recommended for traffic signal synchronization by the Western Avenue Task Force.

3. Widening of Western Avenue. The Western Avenue Task Force also recommended widening of Western Avenue to provide for a third through travel lane in each direction. Consistent with such recommendation, the Traffic Study recommends the widening of Western Avenue along the Ponte Vista project site to provide a third northbound lane of traffic on Western Avenue.

4. Additional Physical Improvements. The Traffic Study also recommends additional physical street improvements such as minor street widening and/or roadway restriping to provide additional turn lanes at six "off-site" intersections. In some cases the physical improvements would enhance synchronization systems proposed as project mitigation, while in others (e.g., along the Pacific Coast Highway corridor) the improvements would enhance synchronization systems to be funded from other sources. For a list of physical improvements, see pages IV.J-111 through IV.J.-117 of the Draft EIR.

5. Public Transit Enhancements. In addition to traffic signal improvements and physical mitigation measures, the Traffic Study recommends access enhancements for the project to public transit including:

- Install bus turnout lanes and shelters on Western Avenue adjacent to the project site in coordination with the MTA.
- Coordinate with LADOT to extend existing San Pedro DASH service to the project site.

D. The Proposed Mitigations Will Eliminate All Project Impacts and Would Further Improve Future Pre-Project Conditions.

The Traffic Study recommends traffic mitigation improvements at a total of 28 intersections.³ At nearly all of these intersections, the recommended mitigation would not only eliminate the project impacts, but would improve intersection operations during the peak hours as compared to the future pre-project conditions. As an illustration, the following chart shows such improvement at two key intersections, Western Avenue at Avenida Aprenda, and the "Five Points" intersection:

³ This includes all intersections with significant impacts as a result of the project and/or the Mary Star of the Sea High School, the main project entrance (which is not included as a significantly impacted intersection) and one unimpacted intersection where improvements would enhance project mitigation at a nearby impacted intersection.

Intersection	Future pre-project volume-to-capacity (v/c) ratio for AM/PM peak hours	Future with-project (and mitigation) v/c ratios for AM/PM peak hours	Mitigation's Improvement over Future Pre-Project (AM and PM Peak Hours)
Western Avenue/ Avenida Aprenda- Proposed Project Access	AM: 1.105 PM: 0.709	AM: 0.884 PM: 0.650	AM: approximately 20% improvement PM: approximately 8% improvement
Vermont Avenue- Palos Verdes Drive North-Anaheim Street-Gaffey Street (5-points)	AM: 0.948 PM: 1.069	AM: 0.882 PM: 1.021	AM: approximately 7% improvement PM: approximately 4% improvement

In addition, because as discussed in Section III.E below, the Traffic Study significantly overstates pre-project traffic baseline levels, the proposed mitigation measures will likely result in even greater traffic mitigation benefits than forecast in the Traffic Study.

E. The Traffic Study Overstates Future Pre-Project Traffic Conditions

The Traffic Study is prepared in accordance with the procedures, policies and standards of LADOT. However, in the opinion of LLG, the Traffic Study significantly overstates potential traffic increases on the street network in the project vicinity between 2005 and 2012 (the projected year of project build-out) for the following reasons:

- Use of the 175 "related" projects in addition to the 1% annual growth factor is redundant. MTA's 1% annual growth factor is based on planning growth documents such as build-out of General Plans for cities throughout Los Angeles County, which includes traffic from all sources, including "related" development projects. In addition, no other major project is proposed for the immediate vicinity of the project. By using both the 1% annual growth factor and the estimated traffic from the 175 "related" projects, the Traffic Study may as much as double the assumed 2005 – 2012 traffic growth in the vicinity of the project.
- As discussed earlier, the Traffic Study assumes that none of the 175 "related" projects (which include the Bridge to Breakwater project) will provide any mitigation measures. In actuality, most major projects will be accompanied by traffic mitigation measures that would reduce congestion from the pre-project levels forecast in the Traffic Study.

- The Traffic Study assumes that all of the "related" projects will be built as proposed – even where they have yet to be approved. For example, the Traffic Study assumes that the Bridge to Breakwater project (which is still in the conceptual stage and has not released an EIR) will be approved as proposed without any traffic mitigation measures. This is an unrealistic assumption. In actuality, many "related" projects are not approved as proposed; most major projects are accompanied by traffic mitigation; and even where approved, many "related" projects are not actually developed.
- The Traffic Study assumes that trips from "related" projects are all independent from one another. For example, the Traffic Study counts a new trip leaving a new residential complex separately and additively from a trip arriving at a new retail center. In actuality, the two trips between the new projects may be made by a single vehicle.

In the opinion of LLG, if a separate traffic analysis were prepared that took these factors into account, it is likely that the impacts projected for the project would be reduced from those projected and that the benefit of the project's mitigation measures would be greater than indicated in the Traffic Study.

IV. Alternatives Evaluated in the Draft EIR and Other Development Options

As an additional tool for evaluating environmental impacts and facilitating informed decisionmaking, the DEIR analyzes a range of alternatives that will both achieve the basic project objectives and reduce the project's significant environmental effects. With respect to traffic impacts, the analysis of project alternatives offers a useful comparison for understanding the range of traffic impacts from various development scenarios and the effects of mitigation.

This section summarizes the three alternatives analyzed in the DEIR,⁴ as well as other traffic scenarios, including the Base Reuse plan previously approved for the site by the City of Los Angeles in 1999, and a "hybrid" scenario that blends key elements of two of the alternatives analyzed in the DEIR. Each of these alternatives and their traffic impacts are described briefly below.

- Single Family Housing (Draft EIR Alternative A)

This alternative would retain the existing R1 zoning for the property. Although the zoning potential of the property is greater, the Draft EIR assumes that 429 single family residential units would be constructed, and forecasts significant traffic impacts at a total of 19 intersections. This significant traffic impact is due in part to the fact that single family homes typically involve a greater number of residents and vehicles per unit as compared with multi-family housing. Multi-family units—particularly age-restricted housing—have a significantly lower peak period trip generation potential as compared to single family development. Alternative A would also result in potential impacts to the Taper Avenue neighborhood because such alternative would not provide a road connecting Mary Star of the Sea High School to Western Avenue.

⁴ The DEIR also analyzes alternative sites. However, because the traffic impacts are not significantly different for the alternate locations, this analysis is not summarized here.

- Increased Age-Restricted (Draft EIR Alternative B)

Alternative B would retain the 2,300 units proposed by the project, but would increase the percentage of age restricted units from 25% to 50%. This scenario results in a total of 21 intersections with significant traffic impacts. As compared with the 23 intersections impacted by the proposed project, this analysis illustrates the effect of increasing the number of age-restricted units. During the weekday commute hours, senior housing units generate the equivalent of approximately 25% of the vehicle trips generated by non-restricted residential condominiums. The relative reduction in peak hour traffic for senior housing as compared to non-restricted residential condominiums is due to various factors, including the tendency of persons residing in age-restricted community (1) to commute less (if at all) to a job on a regular basis; (2) not to have children to transport to school, and (c) generally have the flexibility to schedule trips (such as shopping, recreational, or other appointments) outside of commuter peak periods.

- Reduced Project (Draft EIR Alternative C)

Alternative C would reduce the total number of units to 1,700 and would retain the same percentage of age-restricted units (25%) as the proposed project. This combination results in a significant traffic impacts at 20 intersections. As compared with 23 impacted intersections with the proposed project, this analysis demonstrates the effect of decreasing the number of total units.

- Reduced Project and Increased Age-Restricted "Hybrid" Scenario

For purposes of discussion with the Working Group, LLG analyzed a "hybrid" alternative that would combine the reduction in total units (Alternative C) with an increased percentage of age-restricted units (Alternative B). Under this scenario, there would be 1,700 units, 50% of which would be age-restricted. This alternative would result in significant traffic impacts at 19 intersections, the same number that would result from a single family (R1) alternative.

- Base Reuse Plan

In 1997 the Project site and other related parcels were declared surplus property by the federal government. In 1998 the City of Los Angeles, acting as the Local Redevelopment agency, appointed a citizen advisory committee, the 1998 San Pedro Area Reuse Committee (SPARC) to create a reuse plan for those Parcels (the "Base Reuse Plan"). SPARC met regularly between January and July, 1998, and again in April, 1999. The SPARC recommendations were forwarded to the City Council for final action and the proposed Base Reuse Plan was adopted by the City Council on April 16, 1999. The Base Reuse plan included: (1) a storage and distribution center for homeless needs on less than one acre; (2) 76 units of homeless veterans transitional housing on approximately nine acres; (3) 200,000 square feet of biomedical research facilities and 144 units of refurbished duplexes on 46 acres; and (4) six acres for education or recreational use.

Though it approved the proposed Base Reuse Plan, the City Council acknowledged that the Plan was not consistent with the Low Residential General Plan designation and the R1 zoning designation of the property and that a General Plan amendment/zone change would be necessary. The City Council also acknowledged that the Base Reuse Plan would result in potential traffic impacts and that a traffic study would be required to identify mitigation measures. An EIR was not prepared for the Base Reuse Plan because Harbor-UCLA/REI (the proponent of the biomedical research facility and housing project) did not go forward with the Plan.

The Base Reuse plan alternative would result in significant traffic impacts at 27 intersections. Thus, the most recent development option for the site to receive community support and City approval would have resulted in a substantially greater traffic impact than the project or any other analyzed alternative.

V. Observations Regarding Alternative Scenarios

Table II, below, provides a chart comparing the traffic impacts for each scenario. As seen from this chart, the range of traffic impacts among the solely residential options is relatively narrow, from a low of 19 intersections impacted under the single family housing (R1) option, to 23 impacted intersections with the proposed project. The traffic impacts from each alternative can be fully mitigated.

Comparison of the alternative scenarios discussed provides several instructive points to consider. First, all of the scenarios (including R1 development) will result in substantially similar traffic impacts. Alternative A (R1 zoning) would result in 19 impacted intersections. Among the solely residential options, the maximum difference in weekday traffic impacts is only 4 impacted intersections (19 compared with 23).

Second, unit count alone is not the only factor to consider in reducing the traffic impacts. Single family use generates more trips than multi-family use. As compared to Alternative A (429 units), Alternative C (1,700 units) impacts only one additional intersection. By varying the amount of senior restricted housing, additional traffic mitigation can be achieved. For example, by increasing the percentage of senior restricted housing to 50% in the hybrid scenario (1,700 units), the number of impacted intersections can be reduced to 19, which is the same number of intersections impacted by Alternative A (R1 zoning – 429 units). The "peak" hour trip generation for his hybrid multi-family scenario is also only slightly higher than that of Alternative A (R1 zoning) even though much more housing is provided.

Table II
**COMPARISON OF TRAFFIC CHARACTERISTICS
 DEVELOPMENT SCENARIOS AT
 PONTE VISTA SITE**

DEVELOPMENT SCENARIO	DEVELOPMENT PROGRAM	WEEKDAY PEAK HOUR TRIPS	NO. OF IMPACTED INTERSECTIONS (WEEKDAY AM/PM PEAK HOURS) [1]
PONTE VISTA PROJECT	<ul style="list-style-type: none"> - 2,300 Residential Units (25% Age-Restricted) - 6 Acre Public Park 	<ul style="list-style-type: none"> - 636 AM Peak Hour Trips - 760 PM Peak Hour Trips 	23 Intersections
DEIR ALTERNATIVE A	429 Single Family Homes	<ul style="list-style-type: none"> - 322 AM Peak Hour Trips - 433 PM Peak Hour Trips 	19 Intersections
DEIR ALTERNATIVE B	<ul style="list-style-type: none"> - 2,300 Residential Units (50% Age-Restricted) - 6 Acre Public Park 	<ul style="list-style-type: none"> - 486 AM Peak Hour Trips - 605 PM Peak Hour Trips 	21 Intersections
DEIR ALTERNATIVE C	<ul style="list-style-type: none"> - 1,700 Residential Units (25% Age-Restricted) - 6 Acre Public Park 	<ul style="list-style-type: none"> - 471 AM Peak Hour Trips - 573 PM Peak Hour Trips 	20 Intersections
BASE REUSE PLAN (City Council 1999)	<ul style="list-style-type: none"> - 1 Acre Storage/Distribution Center for Homeless - 76 Units Transitional Housing for Homeless - 200,000 S.F. Biomedical Research - 144 Units Residential - 6 Acre Educational Use (600 Students) 	<ul style="list-style-type: none"> - 809 AM Peak Hour Trips - 424 PM Peak Hour Trips 	27 Intersections
HYBRID SCENARIO	<ul style="list-style-type: none"> - 1,700 Residential Units (50% Age-Restricted) - 6 Acre Public Park 	<ul style="list-style-type: none"> - 360 AM Peak Hour Trips - 458 PM Peak Hour Trips 	19 Intersections

[1] Does not include Mary Star of the Sea High School.

VI. Regional Traffic Planning Observations

The Traffic Study focuses on the analysis and mitigation of localized traffic impacts. However, regional planning and environmental agencies, including the City of Los Angeles, agree that traffic and transportation considerations should not necessarily be limited to local impact issues.

Los Angeles is a major population and job center that has failed to keep pace with the demand for housing. As a result, new housing construction has been pushed further and further from job centers, resulting in "urban sprawl" environmental impacts. These impacts include the elimination of natural resources in outlying areas, freeway congestion, and air pollution from long-distance automobile commuting trips. An associated effect of this housing shortfall has been the dramatic run-up of housing prices and rents that has occurred in urban areas located close to jobs.

The jobs-housing imbalance is particularly acute in the San Pedro and Wilmington-Harbor City areas, where the ports of Los Angeles and Long Beach (together the world's fifth-busiest port) create one of the largest employment centers in the Southern California region. Further, Port-related employment is forecast to dramatically grow. According to the Draft EIR, Port-related employment (centered in the Wilmington-Harbor City/San Pedro area) currently accounts for approximately 500,000 jobs in the region. Moreover, a study by the Los Angeles County Economic Development Corporation projects the potential for an additional one million jobs in Southern California related to international trade growth over the next 25 years. Thus, traffic in the vicinity of the project will continue to grow even if no new housing is added. Moreover, notwithstanding the large number of jobs generated in the area by the Ports and other large employers, very little new housing has been constructed in the area. For example, the Draft EIR indicates that only approximately 524 net new dwelling units were added in Wilmington-Harbor City/San Pedro over the last six years.

Regional planners and local governments have responded to these issues by adopting various policy initiatives collectively known as "smart growth," for example *the Regional Comprehensive Plan and Guide*, *the Southern California Compass Growth Vision*, *the Regional Transportation Plan*, *the Air Quality Management Plan*, *the Congestion Management Program*, *the Housing Crisis Task Force Report* and *the City of Los Angeles General Plan Framework*. Smart growth policies seek to reduce the environmental impacts of urban sprawl by encouraging infill residential development in urban areas. Smart growth policies also seek to promote the more efficient use of scarce land resources and more affordable housing by encouraging increased residential density.

The Ponte Vista project responds to these issues and policies by locating medium-density housing along Western Avenue, which is a major transportation corridor, and thereby promoting the use of public transportation. The proximity of the project to major employment centers will also help to reduce both existing and future commuting trips to the area, consistent with "smart growth" policies. The spectrum of housing types proposed by this project will increase affordability and make it more feasible for those who presently cannot afford to live close to their employment to purchase homes closer to their workplace.

VII. Conclusions

To summarize several highlights of the Draft EIR and Traffic Study:

- The project impacts 23 study intersections
- All project traffic impacts can be mitigated to a less-than-significant level
- The Traffic Study significantly overstates the potential traffic impacts due to the "worse case" methodologies employed by LADOT
- Mitigation measures will improve traffic over future pre-project conditions
- Traffic impacts of all residential alternative development scenarios are substantially similar
- The project is consistent with regional "smart growth" strategies for addressing regional traffic and transportation issues

We hope this memorandum provide a useful basis for the Working Group to begin to digest the Traffic Study and Draft EIR. We welcome the opportunity to hear your questions and comments at the Working Group meeting on November 9, 2006 and look forward to discussing the Traffic Study with you in further detail at that time.