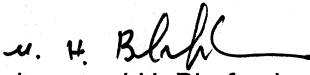


CITY OF LOS ANGELES
INTER-DEPARTMENTAL MEMORANDUM

1600 Palos Verdes Dr North
LADOT Case No. HRB11-008

Date: November 30, 2012

To: Marc Woersching, City Planner
Department of City Planning

From: 
Mohammad H. Blorfroshan, Transportation Engineer
Department of Transportation

Subject: **Response to traffic-related comments from the City of Rancho Palos Verdes for the proposed Marymount College San Pedro Campus Project, 1600 Palos Verdes North [DEPARTMENT OF CITY PLANNING CASE NO. ENV-2011-2478-MND]**

The Los Angeles Department of Transportation (LADOT) issued a traffic assessment report for the proposed Marymount College San Pedro Campus Project on July 24, 2012. On October 17, 2012, Mr. Kit Fox, Senior Administrative Analyst at the City of Rancho Palos Verdes (RPV), issued a letter to your Department commenting on the republished Mitigated Negative Declaration (MND) and LADOT's assessment report for this Project. In his letter, Mr. Fox referenced to the traffic and circulations impacts in the Environmental Impact Report (EIR), certified by the City of RPV in May 2010, for the Marymount College Facilities Expansion Project for the College's main campus in the City of RPV. LADOT has carefully reviewed these comments and provided a response to these comments as follows:

Response to Comments

1. Based on LADOT's review of the Marymount College San Pedro Campus Project traffic study report, the installation of traffic signal at the intersection of Palos Verdes Drive East and Miraleste Drive is not required until Phase II of the Project, which is anticipated to be completed by the year 2019. It is understood that this new traffic signal is also a mitigation measure for the Phase II of the Marymount College Facilities Expansion Project on the RVP Campus, which is currently conditioned to occur by June 2015. Because these are separate and distinct projects, there is no need to revise LADOT's assessment report to address the scheduling conflict for the installation of this traffic signal. In our report, we indicated that the College shall work with the City of RPV to seek the final approval of the traffic signal at this intersection. Therefore, Marymount College will simply coordinate with the City of RPV to implement a new traffic signal at this intersection prior to completion of Phase II of the RPV Campus's Expansion Project or Phase II of the San Pedro Campus Project, whichever occurs first
2. The EIR for the Marymount College Facilities Expansion Project in RPV was prepared to identify impacts associated with that project, which was approved in May 2010 and has not been subsequently modified. The republished MND for the San Pedro Campus Project, which is located approximately 3.5 miles northeast of the RPV Campus, was prepared to identify impacts associated with San Pedro Campus. Since these are two separate and distinct projects, it is not unusual that the potential traffic impacts

associated with the two projects would be different. It should also be noted that the traffic impact study for the San Pedro Campus Project, prepared by the KOA Corporation, based assumptions from the traffic impact study for the RVP Campus, where appropriate. As part of the process, KOA collected additional updated empirical data at the RVP Campus and the San Pedro Campus that was used for the San Pedro Campus study. The empirical data included current vehicle counts at the driveways on both campuses. A license plate survey was also conducted to determine trip distribution patterns between campuses. This data provides the most accurate information to estimate trip generation and distribution for the San Pedro Campus Project. The traffic study assumptions were discussed and approved by LADOT. KOA's traffic study for the San Pedro Campus did not identify any significant traffic impact at the intersection of Capitol Drive, Trudie Drive, and Western Avenue. Therefore, there is no need for LADOT to revise the assessment report to indicate the significant traffic impact at this intersection.

3. RPV's comment asserts that the MND (i.e, the Traffic Study) for the San Pedro Campus Project has not adequately addressed the potential Project's impacts at the intersection of Palos Verdes Drive East and Palos Verdes Drive South. RPV did not provide any detailed information or explanation to support its assertion that the San Pedro Campus Project will generate significant numbers of new trips impacting this intersection. As indicated before, the San Pedro Campus is approximately 3.5 miles northeast of the RPV Campus and the most direct route from the San Pedro Campus to the RPV Campus, and vice versa, is coming from the northerly direction along Palos Verdes Drive East. If a driver decides to travel from the San Pedro Campus to the RPV Campus coming from the south along Palos Verdes Drive South, this would add an additional 2.2 miles to the trip along a very circuitous route. Since this is unlikely to occur, this intersection was not analyzed in the traffic impact study for the San Pedro Campus Project.
4. In response to a request from the Northwest San Pedro Neighborhood Council (NWSPNC), the Marymount College agreed to perform traffic analysis at eight (8) additional study intersections along the Western Avenue and Gaffey Street. KOA prepared the courtesy traffic analysis (CTA) at these intersections in December 2011. The CTA was not required by the City of Los Angeles, the lead agency for the San Pedro Campus Project, therefore, this study was not included as part of the traffic impact analysis for this project. The CTA utilized trip generation assumptions that were current at the time the study was prepared. In early 2012, however, Marymount College representatives recommended adjustments to the trip generation discount assumptions in the traffic impact analysis in order to provide a more conservative estimate of the San Pedro Campus Project's trip generation. The adjusted trip generation estimates were used for the final traffic impact study dated July 2012. For the sole purpose of responding to the City of RPV's comment, KOA has revised the CTA using trip generation assumptions that are consistent with those found in the final traffic impact study for the San Pedro Campus Project. The updated traffic impact study, reviewed by LADOT, revealed that the proposed San Pedro Campus Project will not cause any significant traffic impact at any of the eight studied intersections (see attached tables).

The Marymount College is developing a comprehensive sustainability plan to reduce all of its environmental impacts. As part of the San Pedro Campus Project, the College will implement the measures listed below in order to reduce both traffic and pollution caused by campus vehicle trips. These measures are expected to minimize traffic impacts in the study area.

- Provisions of an enhanced shuttle service between campuses by increasing bus frequency during peak periods of usage
- Provisions of on-campus housing at the San Pedro Campus
- Limitations of the number of student residents who may have a car on the San Pedro Campus
- Schedule morning peak period classes on the San Pedro Campus primarily for on-campus resident students
- Restrict the number of resident students driving to the RPV Campus during the morning peak period
- Implement parking permit/decal system to restrict parking by students on the RPV Campus
- Implement a carpool system

If you have any questions, please feel free to call me at (213) 485-1062.

MB:mhb

Attachments

c: Jay Kim, Sean Haeri, Crystal Killian, DOT
Karen Hoo, David Weintraub, DCP
Jonathan Louie, KOA Corporation