CITY OF RANCHO PALOS VERDES

CITY MANAGER'S OFFICE
ADMINISTRATION

17 October 2012

VIA ELECTRONIC & U.S. MAIL

Marc Woersching
City of Los Angeles
Department of City Planning
200 N. Spring St., 7th Fl.
Los Angeles, CA 90012

SUBJECT: Comments Regarding the Proposed Mitigated Negative Declaration (Case No. ENV-2011-2478-MND) for the Marymount College San Pedro Campus Project [Republished Notice of September 27, 2012]

Dear Mr. Woersching:

The City of Rancho Palos Verdes is in receipt of the republished notice of 27 September 2012 for the above-mentioned Mitigated Negative Declaration (MND). We also thank you for faxing us a copy of the 24 July 2012 correspondence from the Los Angeles Department of Transportation (LADOT) that is referenced as Mitigation Measure XVI-10 in the MND (p. 5). Based upon this additional information, we now offer revised comments[1] on the MND.

As a bit of background, in May 2010 the City of Rancho Palos Verdes certified an Environmental Impact Report (EIR) for the Marymount College Facilities Expansion Project for the College's main campus in Rancho Palos Verdes. The analysis of traffic and circulation impacts in the EIR included the assessment of trips between the main campus and the College's existing residential community on Palos Verdes Drive North in San Pedro, in much the same way that the traffic impact analysis for the proposed MND for the Marymount College San Pedro Campus Project now does.

The EIR identified three (3) study intersections in Rancho Palos Verdes where the project resulted in or contributed to significant impacts: Palos Verdes Drive East and Miraleste Drive; Western Avenue and Trudie Drive/Capitol Drive; and Palos Verdes Drive East and Palos Verdes Drive South. The enclosed excerpt from the EIR Mitigation Monitoring and Reporting Program (MMRP) describes the mitigation measures required to reduce these impacts to less-than-significant levels (i.e., Mitigation Measures TR-2, TR-3 and TR-8, respectively).

In reviewing and comparing the EIR and the MND, the City has identified the following inconsistencies and issues that we believe should be addressed:

1. Both the EIR MMRP (Mitigation Measure TR-2) and the LADOT memorandum (Section D, p. 4) note that the signalization of the intersection of Palos Verdes Drive East and

[1] These comments are intended to replace our previous comments dated 17 September 2012, which were submitted in response to the original publication of this MND on 30 August 2012.

Miraleste Drive would be required reduce impacts to less-than-significant levels. Mitigation Measure TR-2 specifies that this is to occur by the completion of Phase II of the expansion of the main campus in Rancho Palos Verdes, which is currently conditioned to occur by June 2015. However, we note that the LADOT memorandum indicates that signalization of this intersection is not necessary until the completion of Phase II of the San Pedro Campus project, which is currently proposed to occur by 2019. While the City of Rancho Palos Verdes understands that the City of Los Angeles has no jurisdiction over this intersection, we believe that implementation of the traffic signal in the MND should assume the more conservative timing of Mitigation Measure TR-2 so as to avoid imposing conflicting or contradictory conditions upon the College.

2. The EIR MMRP (Mitigation Measure TR-3) identifies the need to restripe the eastbound approach to the intersection of Western Avenue and Trudie Drive/Capitol Drive to address the impacts of the expansion project on the main campus in Rancho Palos Verdes. By comparison, the summary of the impacts associated with the San Pedro Campus project that is attached to the LADOT memorandum (Attachment C, Table 15) does not identify any significant traffic impacts at this intersection. The City of Rancho Palos Verdes respectfully suggests that the traffic impacts of the proposed project upon this intersection should be re-assessed to ensure that the trip generation assumptions, significance thresholds and other factors employed in the EIR and the proposed MND are consistent with one another. The City of Rancho Palos Verdes would be happy to provide the City of Los Angeles with electronic copies with the EIR traffic study and technical appendices to assist in this analysis.

3. The EIR MMRP (Mitigation Measure TR-8) identifies the need for the College to make a "fair share" contribution to the reconfiguration of the intersection of Palos Verdes Drive East and Palos Verdes Drive South to address the cumulative impacts of the expansion project on the main campus in Rancho Palos Verdes. However, the traffic impact analysis of the San Pedro Campus project did not study this intersection at all. As we mentioned in our previous comments on this MND, the San Pedro Campus is but one of five (5) geographically dispersed facilities that make up this institution (see enclosed "Marymount College Campus Locator Map" from the College's website). While the traffic impact analysis in the MND focuses on the relationship between the San Pedro Campus and the main campus in Rancho Palos Verdes, it does little to acknowledge or address the relationship of these two (2) sites with the College's other facilities in the San Pedro area. For example, the MND does not appear to acknowledge or address the likelihood that trips between the San Pedro and main campuses would also include stops at the Waterfront Campus and arts center in downtown San Pedro and/or the Pacific View West residential community on West 24th Street. The City of Rancho Palos Verdes is concerned that the proposed improvements to the San Pedro Campus could result in additional trips between the main campus in Rancho Palos Verdes and the Waterfront and Pacific View West facilities in San Pedro that would have impacts upon the intersection of Palos Verdes Drive East and Palos Verdes Drive South that have not been adequately addressed in the MND. As such, we respectfully request that the impacts upon this intersection be analyzed in the MND as well.

4. As a part of the review of this proposal by the Northwest San Pedro Neighborhood Council (NWSPNC), the College agreed to perform analysis of eight (8) additional study intersections along Western Avenue and Gaffey Street. A copy of this December 2011

supplemental analysis (without appendices) is enclosed for your reference. This analysis concluded that the proposed project would have no significant impacts upon any of these additional intersections. We were surprised to see that none of this supplemental analysis is referenced in the LADOT memorandum. We also note that the trip generation assumptions used in the final traffic impact analysis approved by LADOT are more conservative than those applied to the supplemental analysis. Specifically:

- The supplemental analysis assumed a 75-percent resident student trip reduction during the AM peak hour, while the final analysis approved by LADOT assumed only a 65-percent reduction; and,

- The supplemental analysis assumed that only fifty percent (50%) of the 800-student resident population would make weekday trips to/from the main campus, while the final analysis approved by LADOT assumed 100-percent participation in these daily weekday trips.

The City of Rancho Palos Verdes is now concerned that the supplemental analysis presented to the NWSPNC did not accurately reflect the impacts of the proposed project upon these additional study intersections, particularly those intersections along Western Avenue that are partially or wholly within our jurisdiction. Therefore, we respectfully request that the eight (8) intersections analyzed in the December 2011 supplemental analysis are included in the final traffic impact analysis reviewed by LADOT, and that the more conservative trip generation assumptions used in the final analysis be applied to these additional intersections.

Thank you for the opportunity to comment upon the proposed MND for this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at *kitf@rpv.com*.

Sincerely,

Kit Fox, AICP
Senior Administrative Analyst

enclosures

cc: Mayor Misetich and Rancho Palos Verdes City Council
Carolyn Lehr, City Manager
Carolynn Petru, Deputy City Manager
Joel Rojas, Community Development Director
Ara Mihranian, Deputy Community Development Director
Nicole Jules, Senior Engineer

	Mitigation Measure	Monitoring Milestone	Monitoring Agency	Action Indicating Compliance	Verification of Compliance		
					Initials	Date	Remarks
	submitted for review and approval by the Community Development Director and City Engineer. The Revised Lighting Plan shall include: ▪ Low-level bollards, not to exceed 42-inches in height, in place of the currently proposed pole-mounted lighting along the lower terrace of the eastern parking lot. ▪ Light standards adjacent to the privacy wall for the properties on San Ramon Drive shall not exceed the height of the privacy wall. ▪ Pole-mounted lighting shall not exceed 10-feet in height, except along the easterly boundary of the eastern parking lot, as noted above. ▪ The selected fixtures shall include reflectors, refractors, lenses, or louvers. ▪ The selected shielding accessories shall be the sharp cut-off type. ▪ Lighting fixtures with cut-off shields to prevent light spill and glare into adjacent areas.	Grading Permit	Development Director and City Engineer	of Revised Lighting Plan			
AES-8	Ninety (90) days after the installation of lighting for each phase of the Project, the lighting equipment shall be tested and adjusted to ensure that the proper levels of light and glare have been achieved, to the satisfaction of the Community Development Director and City Engineer.	Sixty (60) Days After the Installation of Lighting For Each Phase	Community Development Director and City Engineer	Receipt of Field Test Results			
AES-9	Prior to the issuance of any Building Permit, the Applicant shall demonstrate to the satisfaction and approval of the Community Development Director and the Building Official that the Athletic Facility (south facing façade) use minimally reflective glass, based on manufacturers' guidelines. All other materials used on the exterior of buildings and structures shall be selected with attention to minimizing reflective glare. The use of glass with over 25 percent reflectivity shall be prohibited on the exterior of all buildings on the Project site.	Prior to Any Building Permit	Community Development Director and Building Official	Approval of Building Plans			
TRAFFIC AND CIRCULATION							
Construction Traffic							
TR-1	Prior to issuance of any Demolition or Grading Permit, the Community Development Director shall review and approve the Construction Management Plan, which shall specify the following, at a minimum: ▪ Demolition debris hauling and materials delivery shall be scheduled, as indicated below, to avoid the peak hour traffic period and minimize	Prior to Any Demolition or Grading Permit	Community Development Director	Approval of Construction Management Plan			

	Mitigation Measure	Monitoring Milestone	Monitoring Agency	Action Indicating Compliance	Verification of Compliance		
					Initials	Date	Remarks
	obstruction of through traffic lanes adjacent to the site. If necessary, a flag person shall be retained to maintain safety adjacent to existing roadways: - Weekdays: Hauling and deliveries shall be scheduled between 9:00 AM and 4:00 PM, with consideration given to reduce deliveries during the 11:30 AM to 1:30 PM lunch period. - Saturdays: Hauling and deliveries, if any, shall not occur during the peak hour period of 11:30 AM to 1:30 PM. There shall be no idling or staging of equipment or accumulation of vehicles on Rancho Palos Verdes City streets. Staging of trucks for the hauling of all demolition debris shall be limited to the College campus.						
Existing Plus Project Conditions							
TR-2	Prior to issuance of the last Certificate of Occupancy for the Phase II buildings (i.e., Library, Maintenance, or Athletic Facility), the Applicant shall implement the following improvement and may be eligible in the future for partial reimbursement from future projects that result in impacts on this intersection: ▪ Palos Verdes Drive East/Miraleste Drive – Signalize the intersection. The intersection traffic signal shall be designed to include a westbound right-turn overlap, which would preclude u-turn movement from southbound to northbound Palos Verdes Drive East.	Prior to Any Certificate of Occupancy	Community Development Director and City Engineer	Verification of Signalization			
TR-3	Prior to issuance of the last Certificate of Occupancy for the Phase II buildings (i.e., Library, Maintenance, or Athletic Facility), the Applicant shall implement the following improvement, at the City's direction, and may be eligible for reimbursement from future projects that result in impacts on this intersection: ▪ Western Avenue (SR-213)/Trudie Drive-Capitol Drive – Re-stripe the eastbound Trudie Drive approach from one shared left-turn/through lane and one de-facto right-turn lane to consist of one left-turn lane and one shared through/right-turn lane. The Project Applicant shall coordinate with the City of Rancho Palos Verdes, City of Los Angeles, and Caltrans regarding implementation of this mitigation.	Prior to Any Certificate of Occupancy	Community Development Director and City Engineer	Verification of Modifications			
TR-4	The traffic impacts and corresponding mitigation measures assume the Marymount College student enrollment at a maximum of 793 weekday students (based on the formula allowing 750 full-time students, 20 part-time students, and a marginal difference of 3.0 percent), and 150 weekend students.	Prior to Any Certificate of Occupancy	Community Development Director	Verification of Student Enrollment			

Mitigation Measure		Monitoring Milestone	Monitoring Agency	Action Indicating Compliance	Verification of Compliance		
					Initials	Date	Remarks
	Additionally, it is assumed, Marymount College student enrollment as a maximum of 250 weekday students enrolled in the BA Program and a maximum of 793 weekday students minus current BA Program weekday students enrolled in the AA Program. Therefore, prior to issuance of any Certificate of Occupancy, student enrollment shall be limited to a maximum of 793 weekday students and 150 weekend students, including full- and part-time students, and maximum of 250 weekday students enrolled in the BA Program and a maximum of 793 weekday students minus current BA Program weekday students enrolled in the AA Program. The College shall submit to the City an Enrollment Report for each Term within an academic year for all Traditional and Non-Traditional Degree Programs and Summer Educational Programs no later than 30-days after a term has commenced.	No Later Than 30 Days From Commencement of Term	Community Development Director	Approval of Annual Student Enrollment Report			
Parking Capacity							
TR-5	Prior to issuance of any Certificate of Occupancy, the Applicant shall institute, to the satisfaction of the Community Development Director and the Public Works Director, parking management strategies to reduce weekday College-related parking demand by the following values: ▪ 11 percent or greater for student enrollment between 744 and 793; ▪ 6 percent or greater for student enrollment between 694 and 743; ▪ 0 percent or greater for student enrollment of 693 or less. Potential parking management strategies may include, but are not limited to, the following: ▪ Provision of "carpool only" parking spaces; ▪ Implementation of parking pricing for campus parking permits; ▪ Utilization of remote parking; ▪ Provision of increased shuttle services; ▪ Offering financial incentives; and ▪ Implementation of restrictions on parking allowed by residents of the Palos Verdes North Facility.	Prior to Any Certificate of Occupancy	Community Development Director and Public Works Director	Approval of Parking Management Strategies			
TR-6	A Parking Management Strategy Program shall be prepared and submitted by the Applicant for review and approval by the Community Development Director, by July 1st of every year. Said Program shall: ▪ Document the prior-year's achieved parking demand reductions;	Prior to Any Certificate of Occupancy	Community Development Director and Public Works	Approval of Parking Management Strategies			

	Mitigation Measure	Monitoring Milestone	Monitoring Agency	Action Indicating Compliance	Verification of Compliance		
					Initials	Date	Remarks
	▪ Identify strategies for use in the upcoming academic school year; and ▪ Be modified on an as needed basis, as deemed necessary by the Community Development Director.		Director	Program			
TR-7	The parking impacts and corresponding mitigation measures assume the Marymount College student enrollment as a maximum of 793 weekday students (based on the formula allowing 750 full-time students, 20 part-time students, and a marginal difference of 3.0 percent) and 150 weekend students. Additionally, it is assumed, Marymount College student enrollment as a maximum of 250 weekday students enrolled in the BA Program and a maximum of 793 weekday students minus current BA Program weekday students enrolled in the AA Program. Therefore, prior to issuance of any Certificate of Occupancy, student enrollment shall be limited to a maximum of 793 weekday students and 150 weekend students, including full- and part-time students, and maximum of 250 weekday students enrolled in the BA Program and a maximum of 793 weekday students minus current BA Program weekday students enrolled in the AA Program.	Prior to Any Certificate of Occupancy	Community Development Director and City Engineer	Annual Student Enrollment Report			
Cumulative (Forecast Year 2012) Conditions							
TR-8	Prior to issuance of any Certificate of Occupancy, the Applicant shall make a proportionate share contribution to implement the following, in addition to improvements specified in Mitigation Measures TR-2 and TR-3: ▪ Palos Verdes Drive East/Palos Verdes Drive South – Modify the intersection to provide a two-stage gap acceptance design for southbound left-turning vehicles. A raised median refuge area shall be constructed for vehicles to turn left from Palos Verdes Drive East to cross westbound Palos Verdes Drive South while waiting for a gap in eastbound traffic to complete the turn to eastbound Palos Verdes Drive South. Additionally, the existing raised median shall be narrowed to provide an acceleration lane along Palos Verdes Drive South to accommodate vehicles accelerating to join eastbound Palos Verdes Drive South traffic flow. Modifications to the Palos Verdes Drive East/Palos Verdes Drive South intersection shall be designed taking into account truck turning radius requirements and shall be to the satisfaction of the Public Works Director. Since the Palos Verdes Drive East/Palos Verdes Drive South intersection is impacted by the proposed Project for "Cumulative with proposed	Prior to Any Certificate of Occupancy	Community Development Director and City Engineer	Verification of Proportionate Share Contribution			

	Mitigation Measure	Monitoring Milestone	Monitoring Agency	Action Indicating Compliance	Verification of Compliance		
					Initials	Date	Remarks
	Project conditions," a proportionate share contribution by the Project Applicant is applicable.						
TR-9	Prior to issuance of any Grading Plan, the Project Plans shall be revised to include wrought iron fencing along Palos Verdes Drive East at approximately 6.0 feet in height and 80 percent open to light and air, temporary retractable netting along the northern, southern and western sides of the athletic field at approximately 30.0 feet in height, and chain link fencing at 20.0 feet in height around the perimeter of the western tennis courts and 10.0 feet in height around the perimeter of the eastern tennis courts so that errant balls are sufficiently contained, to the satisfaction of the Community Development Director. The retractable net shall only be extended during activities involving field balls at the Athletic Field, subject to the limitations set forth in Mitigation Measure AES-5. The Applicant shall be responsible for retracting the net. The use of a landscape screen around and adjacent to the wrought iron fence along the perimeter of the Athletic Field shall be limited to a maximum height of 42 inches.	Prior to Any Grading Plan	Community Development Director.	Approval of Project Plans			
AIR QUALITY							
Short-Term (Construction) Air Emissions							
AQ-1	Prior to issuance of any Grading Permit, the Director of Public Works and the Building Official shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with South Coast Air Quality Management District Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust preventive measures, as specified in the South Coast Air Quality Management District's Rules and Regulations. In addition, South Coast Air Quality Management District Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors: ▪ All active portions of the construction site shall be watered to prevent excessive amounts of dust; ▪ On-site vehicle speed shall be limited to 15 miles per hour (mph); ▪ All on-site roads shall be paved as soon as feasible or watered periodically or chemically stabilized; ▪ All material excavated or graded shall be sufficiently watered to prevent	Prior to Any Grading Permit	Director of Public Works and Building Official	Approval of Grading Plan, Building Plans, and Specifications			


MAIN CAMPUS
30800 Palos Verdes Drive East
Rancho Palos Verdes
Marymount College
PALOS VERDES • SAN PEDRO
PALOS VERDES DRIVE NORTH
RESIDENTIAL COMMUNITY
1600 Palos Verdes Drive North
San Pedro
WATERFRONT CAMPUS
222 West Sixth Street
San Pedro
Marymount College
PALOS VERDES • SAN PEDRO
MARYLYN AND CHUCK KLAUS
CENTER FOR THE ARTS
430 West Sixth Street
San Pedro
PACIFIC VIEW WEST
RESIDENTIAL COMMUNITY
740 West 24th Street
San Pedro
PACIFIC OCEAN
PALOS VERDES ESTATES
ROLLING HILLS ESTATES
RANCHO PALOS VERDES
ROLLING HILLS
SAN PEDRO
EAST SAN PEDRO
San Pedro Bay

KOA CORPORATION
PLANNING & ENGINEERING

1100 Corporate Center Dr., Suite 201
Monterey Park, CA 91754
t: 323-260-4703 f: 323-260-4705
www.koacorporation.com

TECHNICAL MEMORANDUM

To: Mr. Jim Krause
Non-Profit Ventures
4007 Coogan Circle
Culver City, CA 90232-3704

From: Mr. Jonathan Louie

Date: December 14, 2011

Subject: Supplemental Traffic Impact Study for Marymount College San Pedro Campus
[KOA Job Number JB11045]

INTRODUCTION

KOA Corporation prepared a Traffic Impact Study dated October 25th, 2011 for the proposed Marymount College San Pedro Campus Project located at 1600 Palos Verdes Drive North in the City of Los Angeles. That traffic study analyzed project traffic impacts at 17 study intersections. The San Pedro Northwest Neighborhood Council (hereinafter referred to as 'Neighborhood Council') has reviewed the traffic study for this project and has requested a supplemental analysis be prepared that evaluates traffic impacts at additional study intersections located to the south of the project site. In particular, the Neighborhood Council noted that eight additional signalized intersections located along Western Avenue and Gaffey Street should be analyzed for the weekday mid-afternoon and p.m. peak periods. KOA has prepared this technical memorandum summarizing the results and findings of the traffic impacts associated with the project at the eight additional intersections.

PROJECT DESCRIPTION

Marymount College is proposing to construct a sustainable private expanded undergraduate/graduate campus at the San Pedro Campus site. The proposed campus would accommodate 1,500 students, 800 of whom would be residents living on campus including eight (8) faculty apartments. The project site currently has 86 dwelling units that serve as off-campus housing for students matriculating at the Marymount College Rancho Palos Verdes (RPV) campus.

The San Pedro Campus will be a multi-phased project with a build out conditioned upon updated traffic studies to coincide with major phases of the build out. For the purpose of analyzing traffic impacts for this project, a 20-year build out horizon (Year 2031) is assumed.

SUPPLEMENTAL STUDY INTERSECTIONS

The intersections included as part of this supplemental analysis are:

1. Green Hills Drive and Western Avenue
2. Avenida Aprenda and Western Avenue

3. Westmont Drive/Delasonde Drive and Western Avenue
4. Toscanini Drive and Western Avenue
5. Caddington Drive and Western Avenue
6. Westmont Drive and Gaffey Street
7. Capitol Drive and Gaffey Street
8. Channel Street and Gaffey Street

The study intersections located on Western Avenue (#1 through #5) are located in the City of Rancho Palos Verdes. Intersections #6 through #8 are located in the City of Los Angeles.

ANALYSIS METHODOLOGY

The traffic impact analysis at the eight intersections was conducted for the following scenarios:

- Existing 2011
- Existing Plus Project
- Future 2031 Without Project
- Future 2031 With Project

The analysis methodology that was used in the original project traffic study was also used to analyze the eight study intersections. The Critical Movement Analysis (CMA) methodology was used to analyze intersections located in the City of Los Angeles. The intersections located in the City of Rancho Palos Verdes were analyzed using the Intersection Capacity Utilization (ICU) methodology.

According to LADOT, the three study intersections located within the City of Los Angeles are currently operating with ATSAC/ATCS. As such, a 0.10 reduction in volume-to-capacity ratio was assumed at these locations per LADOT traffic study policies and procedures.

EXISTING CONDITIONS

KOA conducted traffic counts at the study intersections on Tuesday, November 15th, 2011. The traffic counts were collected from 2:00 p.m. to 4:00 p.m. (mid-afternoon peak period) and from 4:00 p.m. to 6:00 p.m. The intersection traffic count sheets are included in Attachment A. The counts were utilized to determine existing mid-afternoon and p.m. peak-hour traffic conditions. The existing intersection turn volumes are shown in Figure 1 for the mid-afternoon peak hour and in Figure 2 for the p.m. peak hour.

In addition, KOA conducted fieldwork at each of the study intersections to identify their roadway characteristics including traffic control, approach lane configuration, parking restrictions and bus stop locations. The existing intersection lane configurations are shown in Attachment B.

The existing level of service conditions were calculated based on the traffic count levels and intersection geometrics and signal phasing characteristics. The level of service calculation worksheets are in Attachment E. As shown in Table 1, the study intersections are currently operating at LOS D or better during both the mid-afternoon and p.m. peak hours, except for the intersection of Western Avenue and Caddington Drive which is currently operating at LOS E during the p.m. peak hour.

Table 1 – Existing Intersection Level of Service

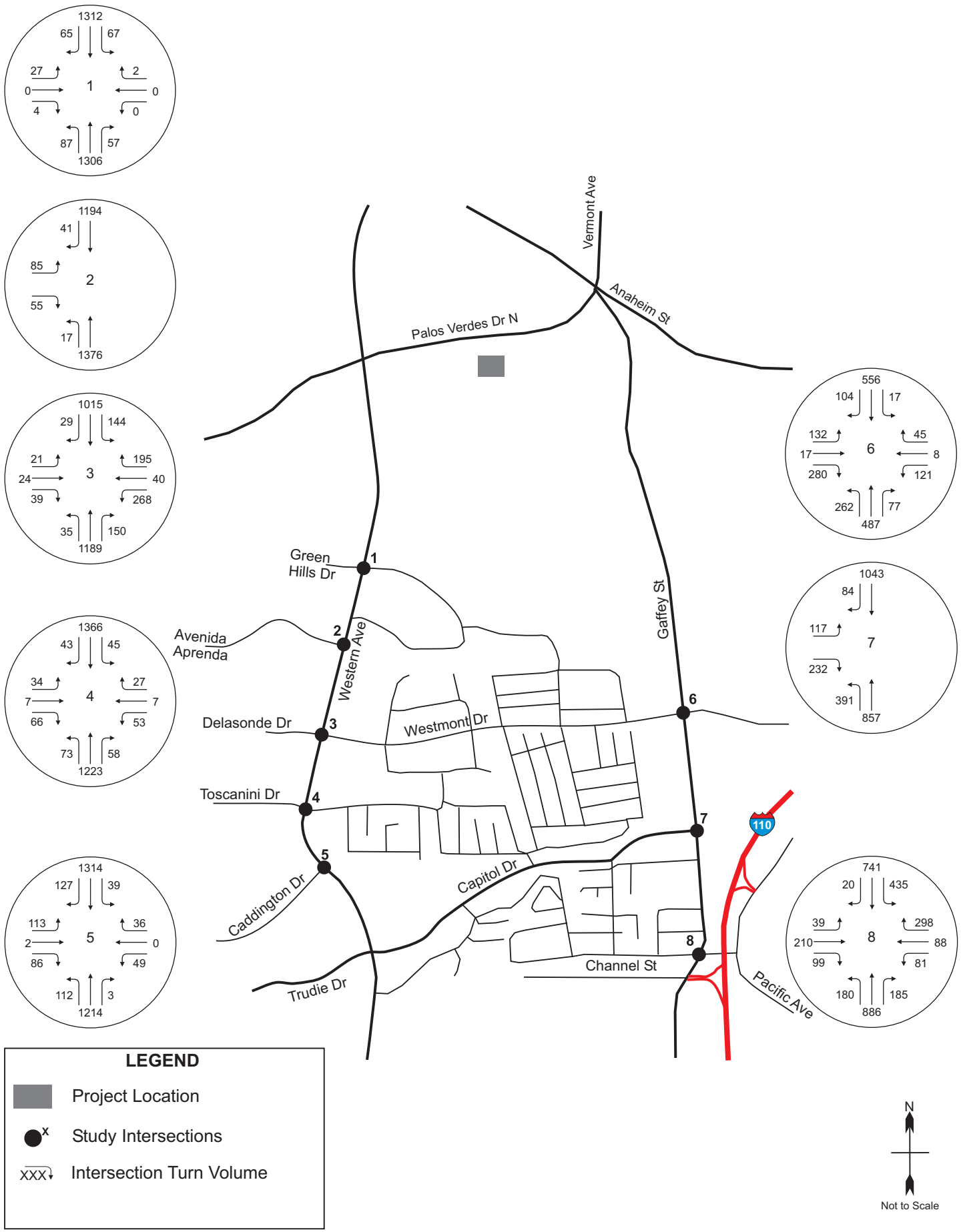
	Study Intersections	City	Existing (2011)			
			Midday Afternoon Peak Hour		PM Peak Hour	
			V/C	LOS	V/C	LOS
1	Western Ave & Green Hills Dr	Rancho Palos Verdes	0.602	B	0.667	B
2	Western Ave & Avenida Aprenda	Rancho Palos Verdes	0.617	B	0.711	C
3	Western Ave & Delasonde Dr/Westmont Dr	Rancho Palos Verdes	0.828	D	0.843	D
4	Western Ave & Toscanini Dr	Rancho Palos Verdes	0.686	B	0.757	C
5	Western Ave & Caddington Dr	Rancho Palos Verdes	0.777	C	0.907	E
6	Gaffey St & Westmont Dr	Los Angeles	0.486	A	0.703	C
7	Gaffey St & Capitol Dr	Los Angeles	0.529	A	0.678	B
8	Gaffey St & Channel St	Los Angeles	0.509	A	0.661	B

PROJECT TRAFFIC

Project Trip Generation

The project's trip generation for the p.m. peak hour is discussed in detail in the October 25th, 2011 traffic study that was prepared for this project. Similar to the p.m. peak hour, the project trip generation for the mid-afternoon peak hour was also based on empirical trip rates derived from surveys conducted at the Marymount College RPV Campus and at the existing Palos Verdes Drive North residential facility site (proposed San Pedro Campus site), as well as trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation*, *8th Edition* book. In addition, trip generation reductions were applied to take into account trip discounts due to students living on campus and other trip reducing measures that will be implemented by the project. Table 2 shows the trip generation rates that were utilized, and the trip generation for the project. The empirical trip rates and trip generation discounts are discussed in the footnotes at the bottom of Table 2.

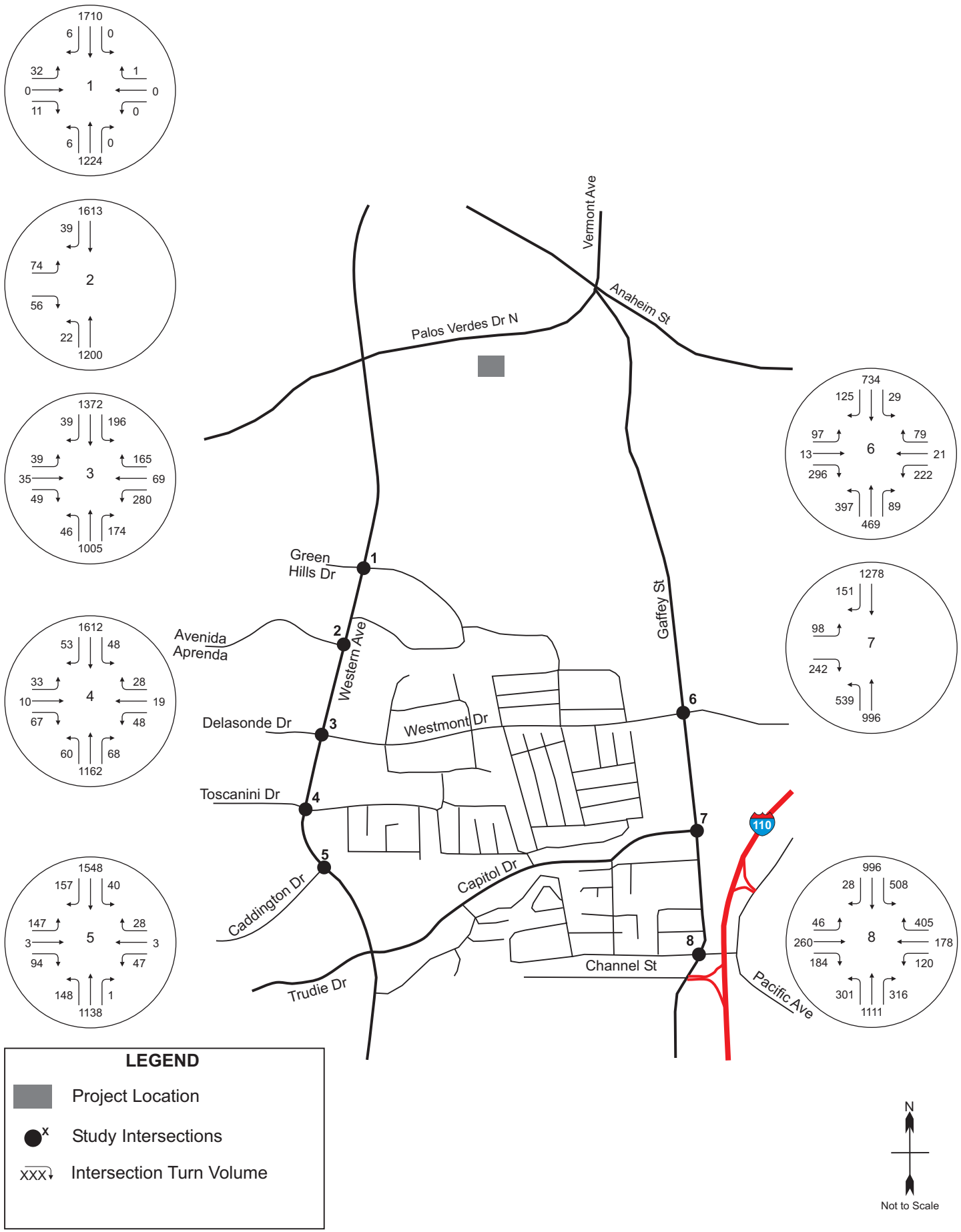
As shown in Table 2, the project upon build out is estimated to generate about 244 mid-afternoon peak hour trips (118 inbound trips and 126 outbound trips) and 279 p.m. peak hour trips (99 inbound trips and 180 outbound trips). The project site currently generates about 41 trips (21 inbound trips and 20 outbound trips) during the mid-afternoon peak hour and 48 trips (25 inbound trips and 23 outbound trips) during the p.m. peak hour. The project would generate an increase of 203 net trips (97 inbound trips and 106 outbound trips) during the mid-afternoon peak hour, and 231 net trips (74 inbound trips and 157 outbound trips) during the p.m. peak-hour.



KOA CORPORATION
PLANNING & ENGINEERING

Marymount College San Pedro Campus - Supplemental Traffic Study — Figure 1

Existing (2011) Mid-Afternoon Peak Hour Intersection Volumes



KOA CORPORATION
PLANNING & ENGINEERING

Marymount College San Pedro Campus - Supplemental Traffic Study — Figure 2

Existing (2011) PM Peak Hour Intersection Volumes

Table 2 - Project Trip Generation

Land Use	Intensity	Unit	Mid-Afternoon Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Trip Rates								
College [1]	-	Student	0.22	47%	53%	0.24	25%	75%
Off-Campus Housing [2]	-	Student	0.29	51%	49%	0.35	52%	48%
Apartment [3]	-	DU	0.62	65%	35%	0.62	65%	35%
Trip Generation								
Proposed Project								
College	1,500	Student	330	155	175	360	90	270
Internal Trip Reduction [4]	53%		-176	-83	-93	-192	-48	-144
Subtotal			154	72	82	168	42	126
Resident Student Trip Reduction (75% AM) [5]			0	0	0	0	0	0
Total Non-Residential College Trips			**154**	**72**	**82**	**168**	**42**	**126**
Residence Halls for Students	800	Student	232	118	114	280	146	134
'Limited Cars for Residents' Trip Reduction (56%) [6]			-130	-66	-64	-157	-82	-75
Subtotal			102	52	50	123	64	59
Internal Trip Reduction (64% Mid-afternoon, 62% PM) [7][8]			-65	-33	-32	-76	-40	-36
Total Non-RPV Campus Trips			**37**	**19**	**18**	**47**	**24**	**23**
Trips to/from RPV Campus [9]	400	Student	116	59	57	140	73	67
'Limited Cars for Residents' Trip Reduction (56%) [6]			-65	-33	-32	-78	-41	-37
Total Trips to/from RPV Campus			**51**	**26**	**25**	**62**	**32**	**30**
Faculty Apartments	8	DU	5	3	2	5	3	2
Internal Trip Reduction (64% Mid-afternoon, 62% PM) [7]			-3	-2	-1	-3	-2	-1
Total Faculty Apartment Trips			**2**	**1**	**1**	**2**	**1**	**1**
Total Trip Generation (Proposed Project Uses)			**244**	**118**	**126**	**279**	**99**	**180**
Existing Uses								
Housing Facility [10]	86	DU	**41**	**21**	**20**	**48**	**25**	**23**
Net Total Trip Generation			**203**	**97**	**106**	**231**	**74**	**157**

[1] Trip generation rates are based on trip surveys conducted at the Marymount College RPV Campus on March 22 and 30, 2011.

[2] The mid-afternoon and PM peak hour trip rates are based on trip generation surveys conducted at the Palos Verdes Drive North residential facility on November 15 and March 24, 2011, respectively.

[3] Trip generation rates are from ITE Trip Generation, 8th Edition.

[4] Based on percentage of students who will be living on the San Pedro Campus (800 resident students/1,500 total students).

[5] Marymount College would schedule the morning peak period classes on the San Pedro Campus exclusively for resident students. A trip reduction of 75% is assumed for the AM peak hour as commuter students are not expected to generate vehicle trips during this period. Resident student trip reduction is not assumed for the mid-afternoon and PM peak hour periods.

[6] About 44% of the 800 San Pedro Campus residents would have a vehicle on campus based on a limited lottery system. The remaining 56% of residents would not have a vehicle on campus and therefore would not generate vehicle trips.

[7] Based on internal trip capture empirical rates for the apartment dormitory component per the Marymount College Facilities Expansion Project Traffic Impact Analysis, RBF Consulting, July 31, 2007. The empirical data showed that 64% of the vehicles during the mid-afternoon peak and 62% of the vehicles during the PM peak are traveling to/from the RPV campus.

[8] The internal trip reduction for the PM was assumed for daily.

[9] Based on information provided by Marymount College representative, about 400 of the 800 residents would take classes at the Marymount College RPV Campus on a typical weekday.

[10] The mid-afternoon and PM peak hour trips are based on raw trip generation survey data conducted at the Palos Verdes Drive North Facility on November 15 and March 24, 2011, respectively.

Project Trip Distribution and Assignment

Trip distribution is the process of assigning the directions from which traffic will access a project site. Trip distribution is dependent upon the land use characteristics of the project and the general locations of other land uses to which project trips would originate or terminate. The project trip distribution was developed based on our knowledge of development trends in the area, local and sub-regional traffic routes, regional traffic flows, and license plate survey data. In addition, the project trip distribution was based on existing student and faculty/staff zip code information that was provided by Marymount College. Two trip distribution patterns were determined. The first distribution is for trips generated by the project but excludes those trips generated by resident students going to/from the RPV Campus. The second distribution is for trips generated by the resident students traveling to/from the RPV Campus. The trip distribution assumptions that were used in the October 25th, 2011 traffic study was also used for the analysis of the eight study intersections.

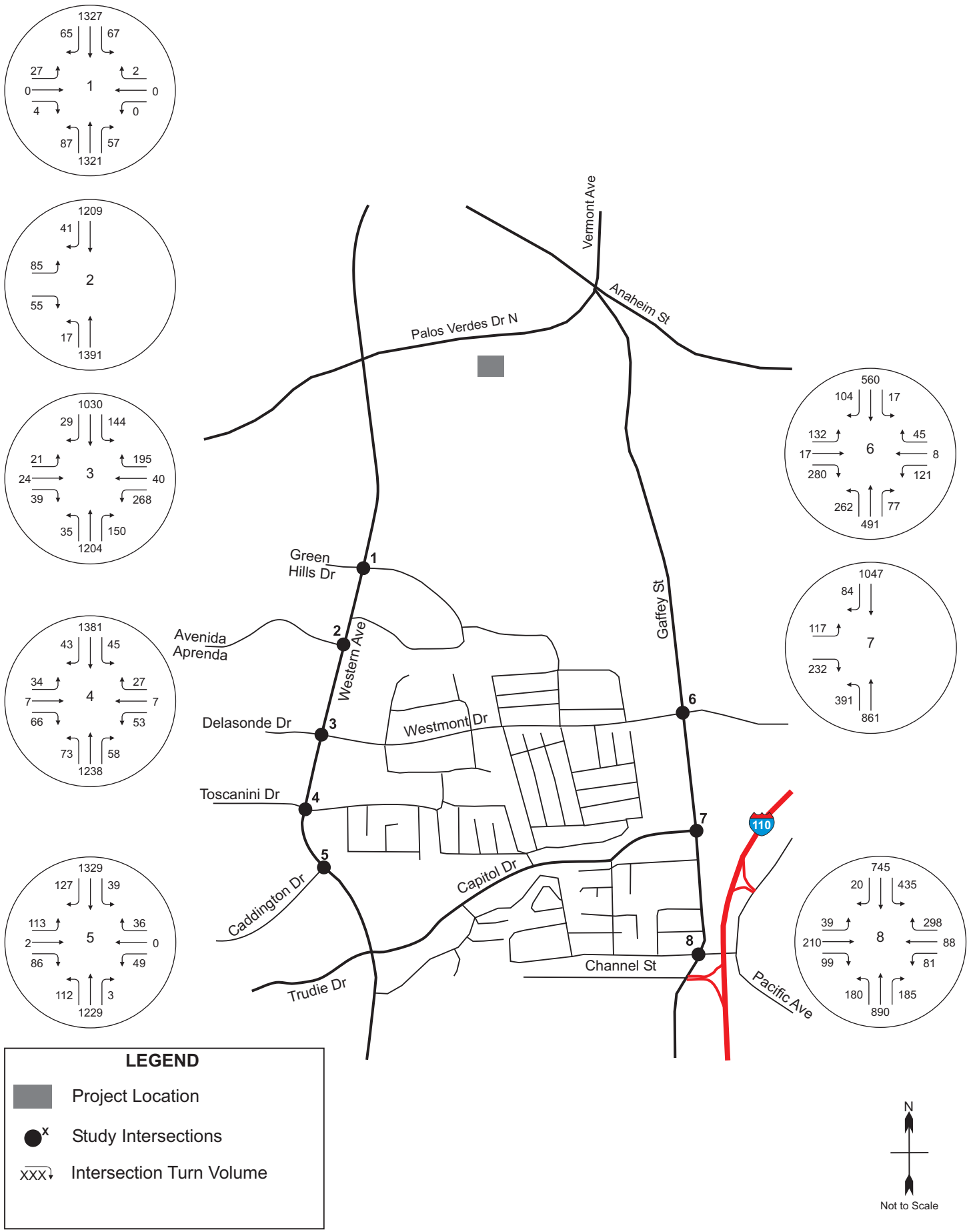
The project trips were assigned based on the trip distributions that were determined for the project. Attachment C illustrates the net project trips for the weekday mid-afternoon and p.m. peak hours.

EXISTING PLUS PROJECT TRAFFIC CONDITIONS

The estimated net project trips shown in Attachment C were superimposed onto the existing traffic volumes to estimate the existing plus project traffic volumes. Figures 3 and 4 show the existing plus project traffic volumes for the mid-afternoon and p.m. peak hours, respectively. The existing plus project level of service analysis results are summarized in Table 3. As shown in this table, the eight study intersections are projected to continue to operate at the same level of services during the mid-afternoon and p.m. peak hour periods as compared to the existing conditions. All of the study intersections are projected to operate at LOS D or better during both the mid-afternoon and p.m. peak hours, except for the intersection of Western Avenue and Caddington Drive which is projected to operate at LOS E during the p.m. peak hour. The level of service calculation worksheets are in Attachment E.

Table 3 – Existing Plus Project Intersection Level of Service

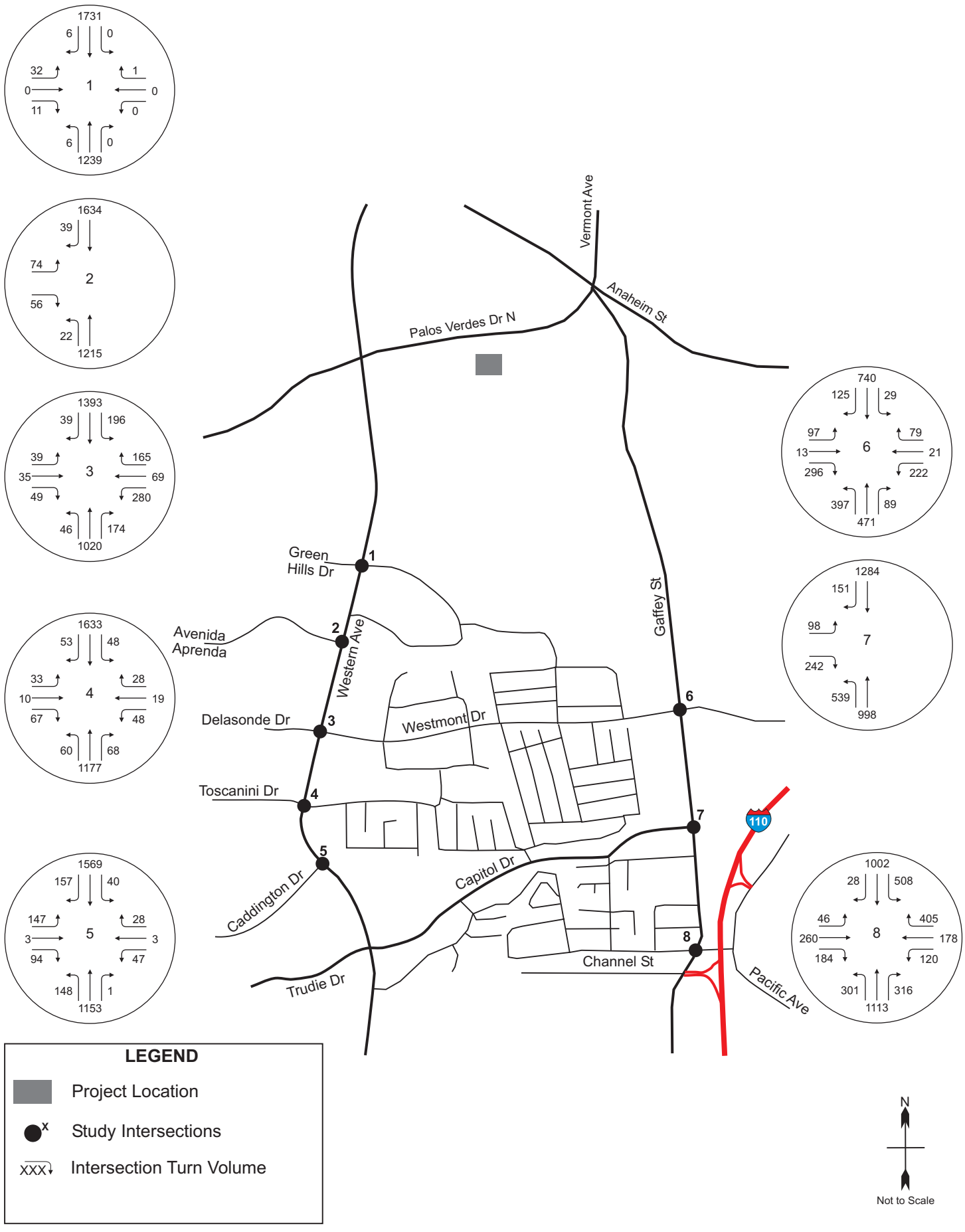
	Study Intersections	City	Existing Plus Project			
			Midday Afternoon Peak Hour		PM Peak Hour	
			V/C	LOS	V/C	LOS
1	Western Ave & Green Hills Dr	Rancho Palos Verdes	0.606	B	0.673	B
2	Western Ave & Avenida Aprenda	Rancho Palos Verdes	0.622	B	0.718	C
3	Western Ave & Delasonde Dr/Westmont Dr	Rancho Palos Verdes	0.833	D	0.848	D
4	Western Ave & Toscanini Dr	Rancho Palos Verdes	0.691	B	0.763	C
5	Western Ave & Caddington Dr	Rancho Palos Verdes	0.781	C	0.914	E
6	Gaffey St & Westmont Dr	Los Angeles	0.488	A	0.705	C
7	Gaffey St & Capitol Dr	Los Angeles	0.530	A	0.680	B
8	Gaffey St & Channel St	Los Angeles	0.511	A	0.662	B



KOA CORPORATION
PLANNING & ENGINEERING

Marymount College San Pedro Campus - Supplemental Traffic Study — Figure 3

Existing Plus Project Mid-Afternoon Peak Hour Intersection Volumes



KOA CORPORATION
PLANNING & ENGINEERING

Marymount College San Pedro Campus - Supplemental Traffic Study — Figure 4

Existing Plus Project PM Peak Hour Intersection Volumes

FUTURE WITHOUT PROJECT TRAFFIC CONDITIONS

Ambient Growth

For the analysis of background traffic for year 2031, a traffic growth factor of 7.1% for the 20-year period was utilized to provide for increases in traffic from the existing traffic volumes. This growth rate is based on the 2010 Los Angeles County Congestion Management Program (CMP) traffic growth projections for the study area and was also used for the October 25th, 2011 traffic study.

Area/Related Projects Growth

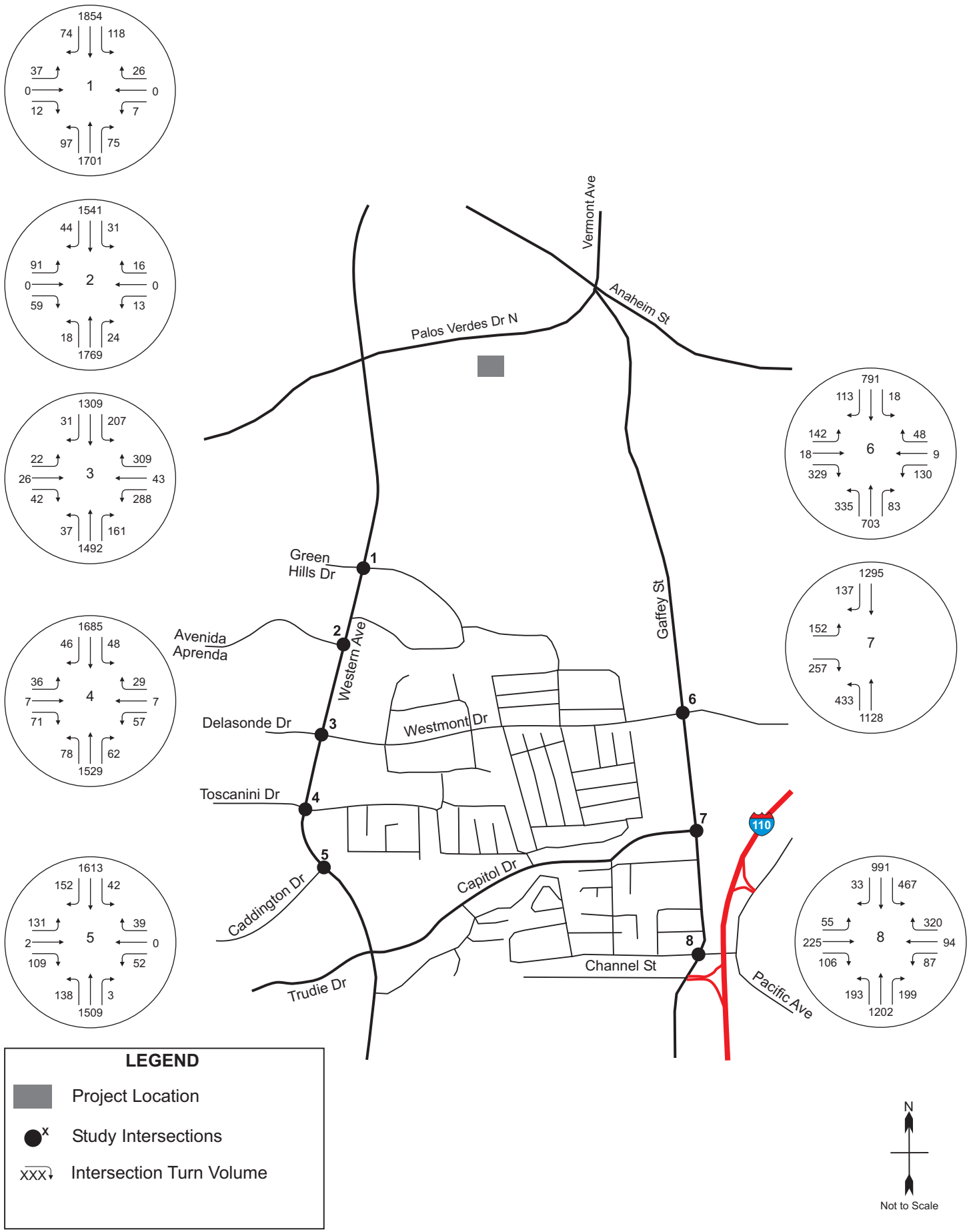
Based on discussions with staff from the cities of Los Angeles, Rancho Palos Verdes, Rolling Hills Estates and Lomita, 77 area/related projects were identified for this analysis. These area/related projects were considered to potentially contribute measurable traffic volumes to the study intersections during the future analysis periods. A description of the related projects and the trip generation of each are summarized in Attachment D.

It should be noted that the trip generation for the p.m. peak hour were obtained from LADOT and other traffic studies as well as based on trip generation rates from the ITE *Trip Generation* 8th Edition book. The trip generation for the mid-afternoon peak hour was not available from LADOT and other traffic studies. Also, the ITE *Trip Generation* book generally does not have trip rates for the mid-afternoon peak hour. Thus, the p.m. peak hour trip generation was assumed for the mid-afternoon peak hour, except for school projects in which the trip rate for the p.m. peak hour of generator from ITE *Trip Generation* was used. Attachment D illustrates the related project trip assignments at the study intersections during the mid-afternoon and p.m. peak hours.

Future Without Project Conditions

The future without project traffic volumes were determined by applying an overall ambient growth factor of 7.1% to the existing peak hour volumes and adding the area/related project traffic. The future without project traffic volumes are shown in Figures 5 and 6 for the mid-afternoon and p.m. peak hour periods, respectively. The future without project level of service analysis was conducted for the study intersections using the traffic volumes shown in Figures 5 and 6. The results are summarized in Table 4 and the level of service calculation worksheets are contained in Attachment E.

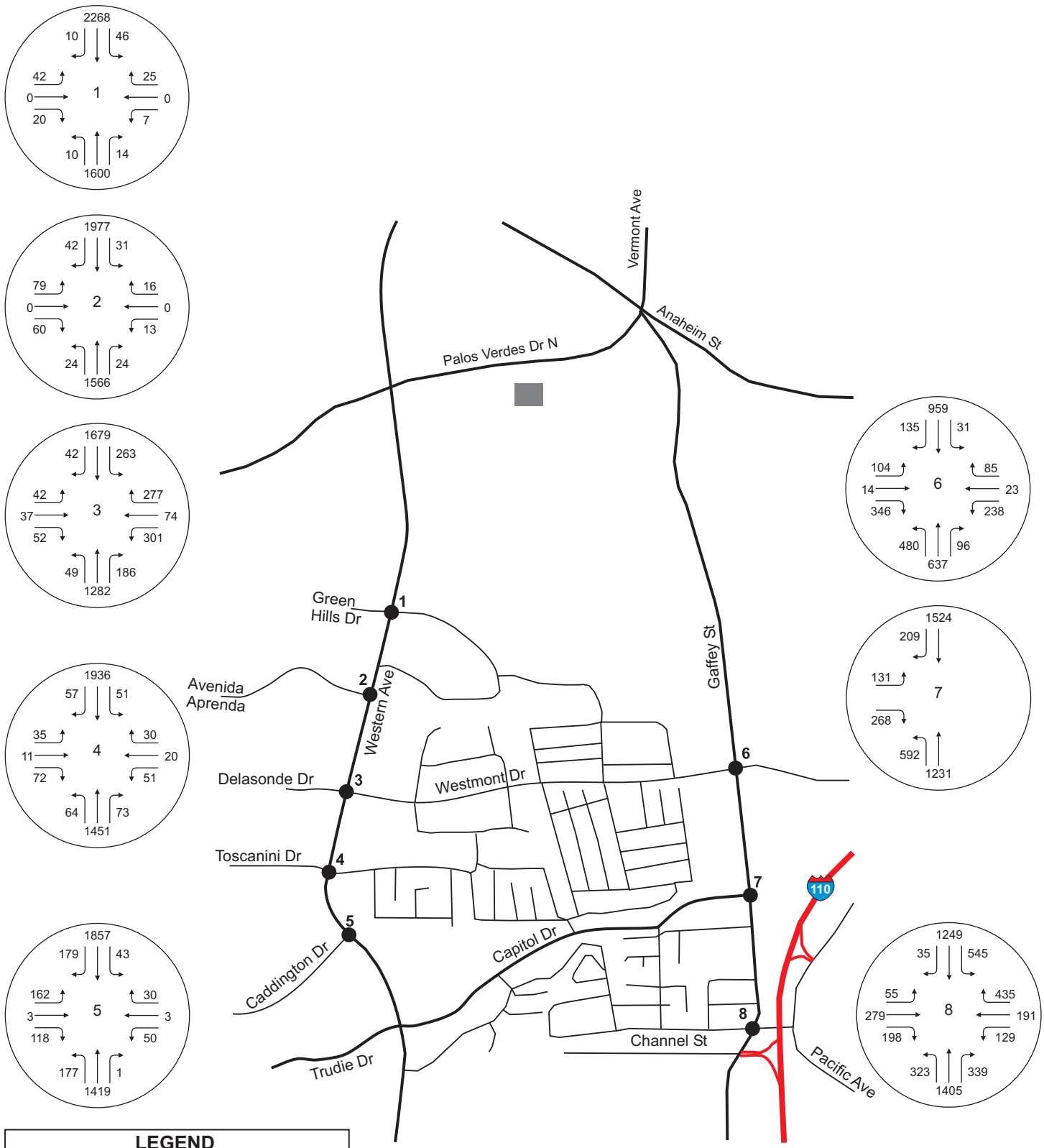
As shown in Table 4, the study intersections are projected to operate at LOS D or better during both the mid-afternoon and p.m. peak hours with the exception of the intersections of Western Avenue/Delasonde Drive/Westmont Drive and Western Avenue/Caddington Drive, which are projected to operate at LOS E or F during both study periods.



KOA CORPORATION
PLANNING & ENGINEERING

Marymount College San Pedro Campus - Supplemental Traffic Study — Figure 5

Future Without Project Mid-Afternoon Peak Hour Intersection Volumes



KOA CORPORATION
PLANNING & ENGINEERING

Marymount College San Pedro Campus - Supplemental Traffic Study — Figure 6

Future Without Project PM Peak Hour Intersection Volumes

Table 4 – Future Without Project Intersection Level of Service

	Study Intersections	City	Analysis Methodology	Midday Afternoon Peak Hour		PM Peak Hour	
				V/C	LOS	V/C	LOS
1	Western Ave & Green Hills Dr	Rancho Palos Verdes	ICU	0.807	D	0.865	D
2	Western Ave & Avenida Aprenda	Rancho Palos Verdes	ICU	0.781	C	0.841	D
3	Western Ave & Delasonde Dr/Westmont Dr	Rancho Palos Verdes	ICU	0.982	E	0.994	E
4	Western Ave & Toscanini Dr	Rancho Palos Verdes	ICU	0.797	C	0.869	D
5	Western Ave & Caddington Dr	Rancho Palos Verdes	ICU	0.922	E	1.055	F
6	Gaffey St & Westmont Dr	Los Angeles	CMA	0.650	B	0.873	D
7	Gaffey St & Capitol Dr	Los Angeles	CMA	0.676	B	0.829	D
8	Gaffey St & Channel St	Los Angeles	CMA	0.642	B	0.793	C

Note:
ICU - Intersection Capacity Utilization Method, CMA - Critical Movement Analysis Method

FUTURE WITH PROJECT TRAFFIC CONDITIONS

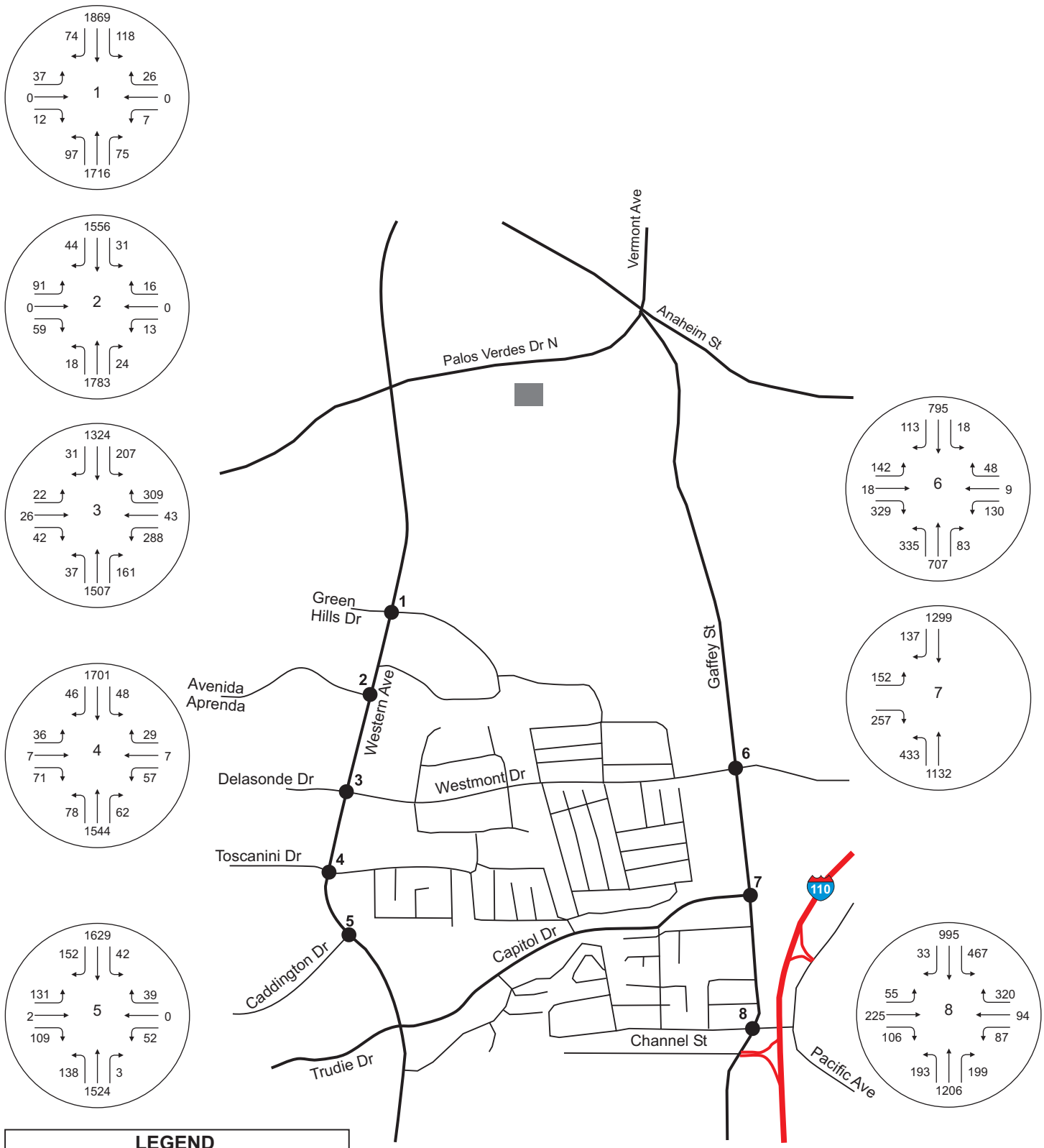
The estimated project trips were superimposed onto the future without project traffic forecasts to estimate the future with project traffic volumes. Figures 7 and 8 show the future with project traffic volumes for the mid-afternoon and p.m. peak hours, respectively. The future with project level of service analysis results are summarized in Table 5. The level of service calculation worksheets are contained in Attachment E.

Table 5 – Future With Project Intersection Level of Service

	Study Intersections	City	Analysis Methodology	Midday Afternoon Peak Hour		PM Peak Hour	
				V/C	LOS	V/C	LOS
1	Western Ave & Green Hills Dr	Rancho Palos Verdes	ICU	0.812	D	0.871	D
2	Western Ave & Avenida Aprenda	Rancho Palos Verdes	ICU	0.786	C	0.847	D
3	Western Ave & Delasonde Dr/Westmont Dr	Rancho Palos Verdes	ICU	0.987	E	0.998	E
4	Western Ave & Toscanini Dr	Rancho Palos Verdes	ICU	0.802	D	0.875	D
5	Western Ave & Caddington Dr	Rancho Palos Verdes	ICU	0.927	E	1.062	F
6	Gaffey St & Westmont Dr	Los Angeles	CMA	0.651	B	0.875	D
7	Gaffey St & Capitol Dr	Los Angeles	CMA	0.678	B	0.831	D
8	Gaffey St & Channel St	Los Angeles	CMA	0.644	B	0.793	C

Note:
ICU - Intersection Capacity Utilization Method, CMA - Critical Movement Analysis Method

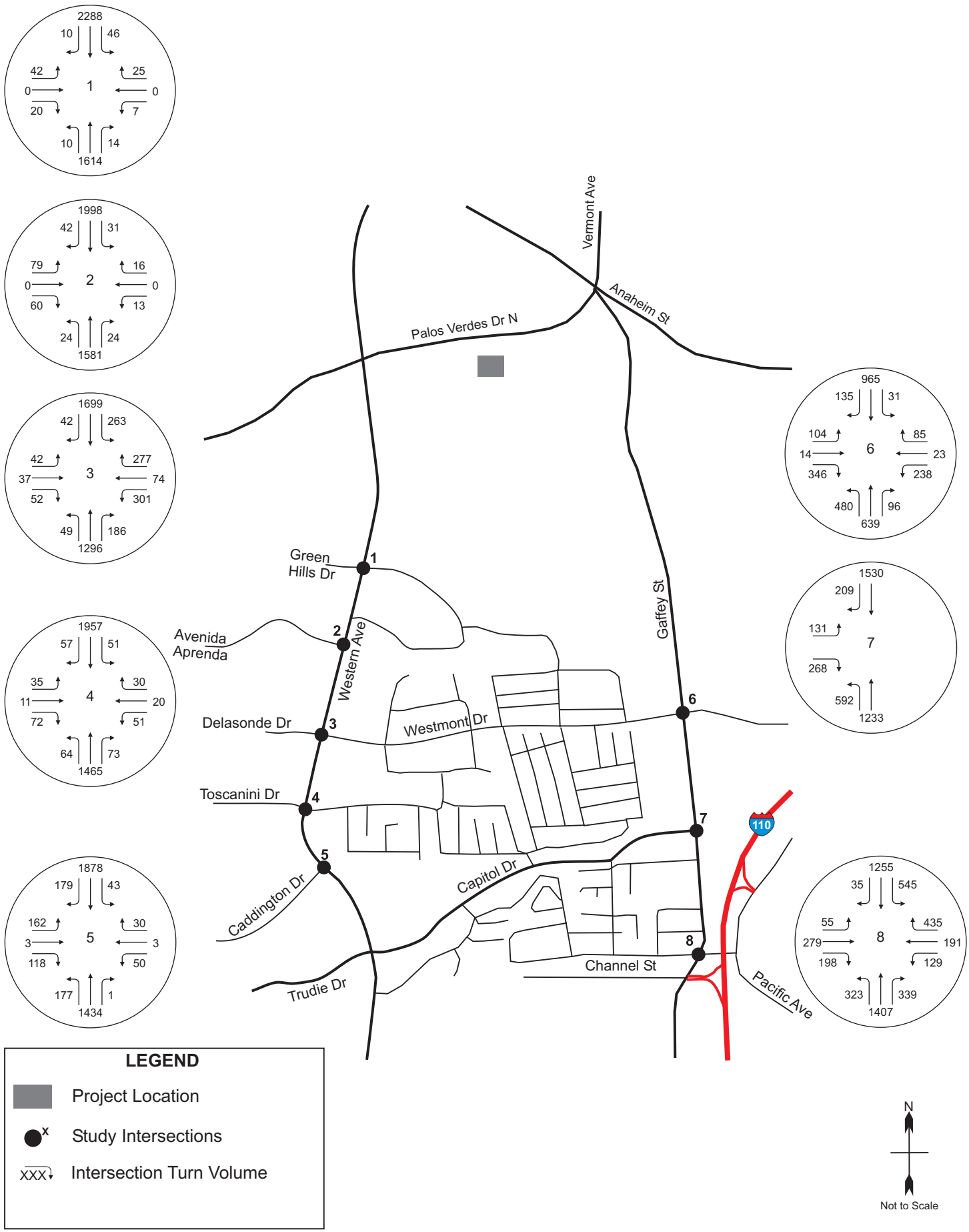
As shown in Table 5, the study intersections are projected to operate at LOS D or better during both study periods with the exception of the intersections of Western Avenue/Delasonde Drive/Westmont Drive and Western Avenue/Caddington Drive, which are projected to operate at LOS E or F during both study periods.



KOA CORPORATION
PLANNING & ENGINEERING

Marymount College San Pedro Campus - Supplemental Traffic Study — Figure 7

Future With Project Mid-Afternoon Peak Hour Intersection Volumes



KOA CORPORATION
PLANNING & ENGINEERING

Marymount College San Pedro Campus - Supplemental Traffic Study — Figure 8

Future With Project PM Peak Hour Intersection Volumes

PROJECT TRAFFIC IMPACT

City of Los Angeles Significant Impact Criteria

LADOT has established specific thresholds for project traffic-related increases in the volume-to-capacity ratio (V/C) of a study intersection. The following increases in the peak-hour V/C ratio are considered "significant" impacts:

Level of Service	Final V/C*	Project Related V/C Increase
C	< 0.700 – 0.800	Equal to or greater than 0.040
D	< 0.800– 0.900	Equal to or greater than 0.020
E and F	0.901 or more	Equal to or greater than 0.010

** Final V/C is the V/C ratio at an intersection, considering impacts from the project, ambient growth and related projects growth, and without proposed traffic impact mitigations.*

City of Rancho Palos Verdes

The County of Los Angeles thresholds of significance criteria was used to determine the project related traffic impact for the signalized study intersections in the City of Rancho Palos Verdes. The following increases in peak-hour V/C ratios are considered "significant" impacts:

Level of Service	Pre-Project V/C	Project Related V/C Increase
C	< 0.700 – 0.800	Equal to or greater than 0.040
D	< 0.800– 0.900	Equal to or greater than 0.020
E and F	0.901 or more	Equal to or greater than 0.010

Based on the results of the analysis and the established significant threshold criteria, the proposed project would not create a significant traffic impact at any of the eight study intersections under the 'Existing Plus Project' and 'Future With Project' scenarios, as summarized in Tables 6 and 7.

KOA CORPORATION
PLANNING & ENGINEERING

Table 6 - Intersection Level of Service Summary – Existing Plus Project

	Study Intersections	City	Analysis Methodology	Existing (2011)				Existing Plus Project				Change in V/C		Significant Impact ?
				Midday Afternoon Peak Hour		PM Peak Hour		Midday Afternoon Peak Hour		PM Peak Hour				
				V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	Mid-Afternoon Peak Hour	PM Peak Hour	
1	Western Ave & Green Hills Dr	Rancho Palos Verdes	ICU	0.602	B	0.667	B	0.606	B	0.673	B	0.004	0.006	No
2	Western Ave & Avenida Aprenda	Rancho Palos Verdes	ICU	0.617	B	0.711	C	0.622	B	0.718	C	0.005	0.007	No
3	Western Ave & Delasonde Dr/Westmont Dr	Rancho Palos Verdes	ICU	0.828	D	0.843	D	0.833	D	0.848	D	0.005	0.005	No
4	Western Ave & Toscanini Dr	Rancho Palos Verdes	ICU	0.686	B	0.757	C	0.691	B	0.763	C	0.005	0.006	No
5	Western Ave & Caddington Dr	Rancho Palos Verdes	ICU	0.777	C	0.907	E	0.781	C	0.914	E	0.004	0.007	No
6	Gaffey St & Westmont Dr	Los Angeles	CMA	0.486	A	0.703	C	0.488	A	0.705	C	0.002	0.002	No
7	Gaffey St & Capitol Dr	Los Angeles	CMA	0.529	A	0.678	B	0.530	A	0.680	B	0.001	0.002	No
8	Gaffey St & Channel St	Los Angeles	CMA	0.509	A	0.661	B	0.511	A	0.662	B	0.002	0.001	No

Note:

ICU - Intersection Capacity Utilization Method; CMA - Critical Movement Analysis Method

KOA CORPORATION
PLANNING & ENGINEERING

Table 7 - Intersection Level of Service Summary – Future With Project

	Study Intersections	City	Analysis Methodology	Future Without Project				Future With Project				Change in V/C		Significant Impact ?
				Midday Afternoon Peak Hour		PM Peak Hour		Midday Afternoon Peak Hour		PM Peak Hour				
				V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	MD Aft Peak Hour	PM Peak Hour	
1	Western Ave & Green Hills Dr	Rancho Palos Verdes	ICU	0.807	D	0.865	D	0.812	D	0.871	D	0.005	0.006	No
2	Western Ave & Avenida Aprenda	Rancho Palos Verdes	ICU	0.781	C	0.841	D	0.786	C	0.847	D	0.005	0.006	No
3	Western Ave & Delasonde Dr/Westmont Dr	Rancho Palos Verdes	ICU	0.982	E	0.994	E	0.987	E	0.998	E	0.005	0.004	No
4	Western Ave & Toscanini Dr	Rancho Palos Verdes	ICU	0.797	C	0.869	D	0.802	D	0.875	D	0.005	0.006	No
5	Western Ave & Caddington Dr	Rancho Palos Verdes	ICU	0.922	E	1.055	F	0.927	E	1.062	F	0.005	0.007	No
6	Gaffey St & Westmont Dr	Los Angeles	CMA	0.650	B	0.873	D	0.651	B	0.875	D	0.001	0.002	No
7	Gaffey St & Capitol Dr	Los Angeles	CMA	0.676	B	0.829	D	0.678	B	0.831	D	0.002	0.002	No
8	Gaffey St & Channel St	Los Angeles	CMA	0.642	B	0.793	C	0.644	B	0.793	C	0.002	0.000	No

Note:

ICU - Intersection Capacity Utilization Method, CMA - Critical Movement Analysis Method

SUMMARY AND CONCLUSIONS

- For existing conditions, all of the study intersections are operating at LOS D or better during both the weekday mid-afternoon and p.m. peak hour periods with the exception of the intersection of Western Avenue and Caddington Drive which is operating at LOS E during the p.m. peak hour.

- The proposed project is estimated to generate about 203 net trips (97 inbound trips and 106 outbound trips) during the mid-afternoon peak hour and 231 net trips (74 inbound trips and 157 outbound trips) during the p.m. peak-hour.

- For the Existing Plus Project conditions, all of the study intersections are also projected to operate at LOS D or better during both the weekday mid-afternoon and p.m. peak hour periods with the exception of the intersection of Western Avenue and Caddington Drive which is operating at LOS E during the p.m. peak hour.

- For the future (2031) conditions without and with development of the project, all of the study intersections are projected to operate at LOS D or better during both the mid-afternoon and p.m. peak hours with the exception of the intersections of Western Avenue/Delasonde Drive/Westmont Drive and Western Avenue/Caddington Drive, which are projected to operate at LOS E or F during both study periods.

- The proposed project would not result in a significant traffic impact at any of the eight study intersections.