

June 4, 2018

Mr. Raymond Klein
BRENTWOOD HOMEOWNERS' ASSOCIATION
P.O. Box 49427
Los Angeles, CA 90049

**Subject: MOUNT SAINT MARY'S UNIVERSITY WELLNESS PAVILION
TRANSPORTATION IMPACT ANALYSIS REVIEW**

Dear Mr. Klein:

INTRODUCTION

RK Engineering Group, Inc. (RK) has reviewed the LADOT (Los Angeles Department of Transportation) Traffic Assessment for the Proposed Mount Saint Mary's University Wellness Pavilion Project to be located at 12001 West Chalon (April 4, 2018), the draft EIR (DEIR) Transportation Section (April 2018) and the Mount Saint Mary's University (MSMU) Wellness Pavilion Transportation Impact Analysis, prepared by Fehr & Peers (January 2018) for the Brentwood Homeowners' Association ("BHA"). RK would offer the following comments with respect to the various documents and the traffic impacts of the project upon the adjacent neighborhood and street systems.

RK has identified a number of issues associated with the traffic analysis which need to be further evaluated to fully review the traffic impacts of the proposed Mount Saint Mary's University Wellness Pavilion project. These include the potential growth in student body at the university, the actual trip generation of the planned events on the campus, the trip distribution of these events, the impact of concurrent events at the campus, a means of reducing the construction related traffic impacts to neighborhood streets, the need for a meaningful monitoring of future traffic impacts and a mitigation program to actually reduce the adverse traffic impacts identified in the traffic study. The mitigation program needs to not only reduce traffic impacts from the project, but also the current significant traffic impacts that are currently occurring on the local neighborhood streets and at the Sunset Boulevard intersections that are operating at a poor level of service.

COMMENTS

1. The entire traffic study assumed that the current student enrollment would remain as it currently exists (approximately 1,500 students) and no increase in the student body would occur with the buildout of the project. The University has indicated in the past that they have the right to have an increased number of students, based upon the availability of parking on the campus. Although we understand that BHA disputes this claimed right, there is the potential for the number of students to increase from 1,500 to 2,244 students. The traffic study did not take into consideration this potential increase in the number of students from a traffic and parking standpoint. This increase in number of students would be considered a related project just like the other 67 related projects that were included in the traffic analysis. As a result of this, the potential impacts from a traffic and parking standpoint would be significantly greater than those documented in the traffic study and DEIR. The DEIR does not evaluate and analyze the adverse impacts of a larger enrollment on traffic and parking, and whether potential mitigation of those impacts is possible. Further, the DEIR is deficient in not analyzing the potential of unlimited students and staff being shuttled from the school's Doheny campus in downtown Los Angeles.
2. The traffic study evaluated three (3) types of events at the campus. These included the "Other Wellness/Sports Events", the "Health and Wellness Speaker Series" and the "Summer Sports Camps" as individual events not occurring on the same day. It was assumed that these events would not occur concurrently; therefore, their impacts were evaluated separately. *Is there a possibility that that these events could occur concurrently? If so, what would be the increased traffic and parking impacts of several events occurring on the same day?* If this is not planned to occur, then a Condition of Approval would be required in order to disallow any concurrent events on the same day.
3. The traffic study calculated Event Trip Generation based upon the assumed attendance figures and event sizes. *Why wasn't the trip generation determined by measuring traffic at actual events currently occurring at the University and expanded based upon the expected attendance figures for the proposed project?* Traffic counts during actual events could be used to evaluate the trip characteristics of these events, rather than making assumptions on the number of trips and vehicle occupancies that may occur.

4. The Neighborhood Street analysis was based upon assumed local traffic routes on seven (7) streets. *What about the other local streets in the area that could serve as potential access to the site?* A license plate matching survey of existing traffic going to/from the University could be conducted to track the actual routes that are currently used by students and other visitors to access the site to make this assessment. With this study, actual field data could be used to verify the assumed routes to/from the University.
5. The project trip distribution was based upon a Select Zone run for the LA Travel Demand Model. This was based upon the TAZ (traffic analysis zone) which includes the University. *Was this TAZ strictly the University, or did it also include a substantial amount of existing residential development?* These non-University trips would have a different set of destinations than students or others attending the special events at the University.

The distribution patterns should be cross-checked with zip code numbers for the students and event attendees. The ZIP code evaluation was done in the *Mount Saint Mary's TDN Report and Three Year Action Plan Updated in April 2015* (Steer Davies Gleave). That study (strictly of MSMU and not the general population) showed much more traffic originating in the San Fernando Valley and less traffic orientated towards the west. This would have an impact to the traffic analysis that was performed for the current traffic study. This could also be cross-checked by doing a survey of current event attendees to see if the generalized trip distribution patterns match the Traffic Model results. A change in trip distribution patterns could have a significant impact on the results of the traffic study.

6. The proposed project has direct significant impacts at three (3) study area intersections during the school year and four (4) intersections for the cumulative conditions. Again, the study assumed no "concurrent events" which would have even more significant impacts than were identified in the traffic study. The study does not identify any feasible mitigation measures for these impacts as a result of the project. A reduced level project and reduced enrollment numbers should be considered given the significant unavoidable impacts of the proposed project.
7. The project has direct significant impacts at up to six (6) neighborhood streets (Bundy Drive north of Norman Place, Chalon Road east of Bundy Drive, Chalon Road west of Norman Place, Norman Place north of Bundy Drive, Bundy Drive north of

Saltair Avenue, Bundy Drive north of Sunset Boulevard). No mitigation measures are suggested to reduce or eliminate these impacts. Additionally the project should implement "traffic calming" techniques on all of the affected neighborhood streets to reduce the traffic impacts from the project.

These neighborhood streets are "local" roads in the Brentwood-Pacific Palisades Community Plan and "Hillside Limited Streets" in the Baseline Hillside Ordinance, and intended to accommodate lower volumes of vehicle traffic. Consideration should be given to how each of these limited streets can handle either increased volume and/or larger vehicles.

MSMU and the neighborhood streets used for access to MSMU are located within an area designated by the City as "Very High Fire Hazard Severity Zone." Consideration should be given to how each of these limited streets can accommodate emergency fire vehicles and emergency evacuation by MSMU students and staff and by neighborhood residents.

8. The project should consider an off-site staging area and shuttle service for event attendees to further reduce traffic and parking impacts.
9. A parking study was previously prepared for the University in 2014 (over four years old) and was not updated as part of the current traffic study. It indicated that a maximum occupancy of 76% (425 spaces) occurred at that time. It is not clear whether this was for a normal day condition or whether it included any special events. A current parking demand analysis should be conducted to evaluate the potential demand when the University is in session and when special events occur. The results of these surveys should be compared to the available parking capacity with and without Valet Service. Also, if Valet service is to be considered, a plan should be included in the traffic study that shows where it is to be located, how it is to be designed and how it is to function.

10. The actual parking demand during construction should be quantified and compared to the available parking capacity of the site during each phase of construction. As a mitigation measure, it is recommended that an off-site parking area and shuttle service be provided for construction workers. This would also reduce the traffic impacts to intersections and neighborhoods streets.

On Page 66 of the Traffic Study, it suggests valet parking in parking lot aisles as a solution to the loss of 222 parking spaces during construction. There should be a disclosure of the maximum number that valet could stack in the aisles, and the number of cars anticipated to park on residential streets.

11. On Page 74 of the Traffic Study, it suggests that when 37 outbound PCE's (Passenger Car Equivalents) occur, the off-site parking program should be implemented. This will be very hard to monitor and determine, therefore, it is recommended that the construction worker off-site parking program be implemented at all times during construction to reduce local parking impacts in the area. The off-site construction parking program would also reduce the traffic impacts at the two (2) affected intersections and at Neighborhood local streets. The location and operating parameters should be identified in the traffic study and be made a "Condition of Approval" of the project.

12. As identified in the Traffic Study, Alternatives #3 and #4 would have the potential to reduce the direct significant impacts of the project to intersections and Local Neighborhood Streets. This will require a significant reduction in event size and not allowing any concurrent events or events when other schools in the area are also having events. In order for these alternatives to be effective, there must be an enforceable means of measuring the amount of traffic that needs to be developed and implemented on an ongoing basis. Since there is only one main access point to the campus this can be done with current technology and will have to be monitored on an ongoing basis. A required ongoing mitigation monitoring program and transportation demand management plan will be needed to assess traffic conditions and reduce traffic from the existing campus and the proposed Wellness Pavilion. By monitoring certain traffic thresholds an action plan can be implemented to make sure that adverse traffic impacts do not occur.

13. The actual traffic impacts to all of the affected local streets needs to be monitored on an ongoing basis. This will be necessary to identify where traffic calming needs to be implemented based upon existing and future traffic from the University. Some form of "Traffic Calming" should be implemented in that area to further reduce the project's impact to the area. A "Condition of Approval" will be required to review the appropriate "traffic calming" techniques to be implemented in the neighborhood street system. Also, as previously mentioned, the project should not be allowed to have concurrent events on the same day. If they were to simultaneously occur, the impacts would be compounded and substantially worse than what has been identified to date in the traffic study.

14. No increase in the number of students over the maximum determined to be lawfully approved (and certainly no increase over the current approximately 1,500 students) should be permitted without additional environmental/traffic review, including an evaluation of the mitigation monitoring program and transportation demand management plan. The objective of these programs would be to not only reduce the traffic impacts from the Wellness Pavilion, but from the existing University as a whole.

CONCLUSIONS

RK has reviewed the transportation documents for the Mount Saint Mary's University Wellness Pavilion project. A number of issues have been identified with the traffic analysis that warrant additional review and evaluation. These include the potential growth in student body at the university, the actual trip generation from the planned events on the campus, the trip distribution of these events, the impact of concurrent events at the campus, a means of reducing the construction related traffic impacts to neighborhood streets and the need for a meaningful means of monitoring future traffic impacts and a mitigation program to actually reduce the adverse traffic impacts identified in the traffic study.

The mitigation program and mitigation monitoring program needs to not only reduce traffic impacts from the project, but also the current significant impacts that are currently occurring on the local neighborhood streets and at the intersections that are operating at a poor level of service impacted along Sunset Boulevard.

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RK appreciates the opportunity to work with the Brentwood Homeowners Association and provide this evaluation of the Mount Saint Mary's University Wellness Pavilion Project. If you have any questions, please call me at (949) 474-0809.

Sincerely,

RK ENGINEERING GROUP, INC.



Robert Kahn, PE

Founding Principal

RCE 20285

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JN:2747-2018-01



Areas of Expertise

- Traffic Engineering
- Transportation Planning
- Transportation Solutions
- Traffic Impact Analysis
- Circulation Systems for Planned Communities
- Traffic Control Device Warrants
- Traffic Calming
- Traffic Safety Studies
- Bicycle Planning
- Parking Demand Studies
- Transportation Demand Management
- Traffic Signal, Signing and Striping Plans
- Traffic Control Plans
- Parking Lot Design
- Acoustical Engineering
- Noise Impact Studies
- Expert Witness / Legal Services

Professional History

- RK Engineering Group, Inc., Founding Principal
2001-Present
- RKJK & Associates, Inc., Principal, 1990-2000
- Robert Kahn and Associates, Inc., Principal, 1988-1990
- Jack G. Raub Company,
Vice President Engineering Planning, 1977-1988
- The Irvine Company, Program Engineer, 1972-1977
- Caltrans CA Division of Highways, Assistant Engineer, 1968-1972

Representative Experience

Robert Kahn, P.E., has worked professionally in traffic engineering and transportation planning since 1968. He received his Master of Science degree in civil engineering from the University of California, Berkeley, Institute of Transportation and Traffic Engineering. Mr. Kahn received his Bachelors degree in Civil Engineering from the University of California, Berkeley.

Mr. Kahn started his career in California Division of Highways (Caltrans) and developed the first computerized surveillance and control system for the Los Angeles area. Mr. Kahn developed the California Incident Detection Logic which is utilized throughout California for the detection of traffic incidents on the freeway system.

Mr. Kahn has worked for a major land development company preparing Master Plans for infrastructure. He also has worked eleven years with a multi-disciplined consulting engineering firm in charge of the Engineering Planning Department. This included all facets of preliminary design, tentative map preparation, transportation and environmental engineering, and public agency coordination.

Mr. Kahn has provided traffic and transportation services to major planned communities including Aliso Viejo, Coto De Caza, Foothill Ranch, Highlands Ranch in Denver, Colorado, Mission Viejo, Talega Planned Community in San Clemente, and Wolf Valley Ranch in Temecula. He has also provided contract traffic engineering services to the Cities of Irvine, Norwalk, Perris and San Jacinto in Riverside County, California.

Mr. Kahn has prepared traffic impact studies for numerous communities throughout Southern California, Nevada and in Colorado. Major traffic impact studies include the Aliso Viejo Town Center, the Summit Development, the Shops at Mission Viejo, Kaleidoscope, Dana Point Headlands, Foothill Ranch, Talega, Majestic Spectrum, and Centre Pointe in the City of Chino.

His work in the area of parking demand studies and parking lot design has been extensive. Shared parking studies for the Aliso Viejo Town Center, Foothill Ranch Towne Centre, Trabuco Plaza and numerous commercial sites have been completed to accurately determine the peak parking demand for mixed use projects. Mr. Kahn has been able to make the most efficient utilization of parking lots by maximizing efficient and safe systems.

Robert Kahn, P.E., T.E

Founding Principal

Education

University of California, Berkeley, M.S., Civil Engineering, 1968

University of California, Berkeley, B.S., Civil Engineering, 1967

University of California, Los Angeles, Graduate Courses in Transportation Systems, 1970

Registrations

California Registered Civil Engineer
No. 20285 – April 1971

California Registered Professional Engineer
Traffic, No. 0555 – June 1977

Colorado Professional Engineer
No. 22934, November 1984

Nevada Professional Engineer Civil
No. 10722 – March 1994

County of Orange, California Certified Acoustical Consultant
No. 201020 - 1984

Affiliations

Institute of Transportation Engineers (ITE)

American Society of Civil Engineers (ASCE)

Urban Land Institute (ULI)

Orange County Traffic Engineers Council (OCTEC)

Teaching

UCI Graduate Urban Design Studio Class – Guest Instructor

ITS Berkeley – Tech Transfer
Fundamentals of Traffic Engineering – Instructor

UCI Senior Civil Engineering Mentoring Program (CE181)

Mr. Kahn has been an innovator in developing and implementing traffic calming techniques. Over twenty years ago, Mr. Kahn refined the design and implementation standards for speed humps for use in local neighborhoods. Most recently, he has been involved in the development of modern roundabouts in lieu of traffic signals or other traffic control devices at intersections. Mr. Kahn previously presented the use of traffic calming devices in newly developing communities to the Institute of Transportation Engineers Traffic Calming Conference in Monterey, California.

Mr. Kahn has been involved in the design of traffic signal systems, signing and striping plans on hundreds of projects for both the public and private sector. Most recently, he has completed the design of several traffic signals which will serve the renovated Shops at Mission Viejo Mall. Mr. Kahn was in charge of a major ITS project for the City of Irvine, which provided fiberoptic interconnect and closed circuit TV along Barranca Parkway, Alton Parkway and Lake Forest Drive.

Mr. Kahn has been involved in acoustical engineering since 1978. He was in responsible charge of the Aliso Viejo Noise Monitoring Program which redefined the 65 CNEL noise contours for MCAS El Toro. He has also developed computer applications of the FHWA Noise Model.

Mr. Kahn has prepared numerous noise impact reports in the Aliso Viejo, Mission Viejo, Foothill Ranch, Santa Margarita, Ladera and Talega Planned Communities. Noise impacts from stationery sources including car washes, loading docks, air conditioning compressors, drive-thru speakers and other sources have been evaluated in the Aliso Viejo Auto Retail Center Noise Study, Albertsons Store 606 Noise Study-Rancho Cucamonga, Pro Source Distribution Building Final Noise Study in Ontario. Major specific plan and zone change noise studies have been prepared for the Summit Heights Specific Plan in Fontana, Lytle Creek Land and Resources Property in Rialto, Tamarack Square in Carlsbad, California, International Trade and Transportation Center in Kern County, California, and Sun City/Palm Springs.

Mr. Kahn founded the firm of Robert Kahn and Associates in 1988, which was the predecessor to RKJK & Associates, Inc. in 1990. He has made presentations to the ITE and the California Public Works Conference. Mr. Kahn has published numerous articles on traffic impact assessment, traffic calming, striping and the status of Bicycle Sharing in the USA. He was awarded the Wayne T property award in 2011-2012. Mr. Kahn has been a mentor and advisor to the UCI Senior Civil Engineering Project (CE181) for the past several years. He provides students the opportunity to develop a real life transportation project for the program.

Robert Kahn has been involved in numerous legal cases as an expert witness and providing legal assistance in the area of traffic and environmental engineering. This has included traffic/parking impact analysis, traffic/circulation/parking impacts of ROW takes, traffic engineering design review, traffic safety studies and noise/vibration impact assessments. A sampling of these projects include the following cases:

- Tustin Avenue/Rose Drive Grade Separation Impact to Del Cerro Mobile Estates, City of Placentia
- 9582 Chapman Avenue – ULI Shared Parking, City of Garden Grove
- Plantation Apartments Norwalk 12809 Kalnor Avenue I-5 Construction Noise Monitoring Assessment
- City of Huntington Beach vs. Alvarez, et al, Traffic Review of ROW taking
- Gene Autry Way Extension – Impacts to Anaheim Holiday Inn and Staybridge Suites Hotel, Anaheim
- UCSD Student Center Traffic and Parking Impact Review, City of San Diego
- Palma De La Reina Traffic Impact Analysis Review
- Newport Tech Center Traffic Study Review, Newport Beach
- City of Irvine Planning Area 18, 34 and 39 DEIR Traffic Impact Review, City of Irvine
- City of San Diego Big Box Ordinance, City of San Diego
- City of Yucaipa Big Box Ordinance, City of Yucaipa
- Electra Real Estates USA Mid Coast Corridor Transit Project Traffic/Circulation and Parking Impact Review, City of San Diego
- Rancho El Revino Specific Plan Traffic Impact Study Review
- President Hotel Santa Ana parking lot dispute
- Caceres vs. City of Fontana, represented City in an Intersection (Production at Santa Ana Ave.) Accident
- Corona vs. City of Fontana, represented City in an Intersection (Sierra Ave. and Summit Ave.) Accident
- Sunset and Gordon Mixed Use Site Traffic Review
- Baldwin Hills Crenshaw Plaza EIR and Traffic Study Review
- Saint Mary's University Wellness Pavilion EIR and Traffic Study Review
- 15 Degree South Residential Project Traffic Review
- Review of the OCTA Tustin Avenue Rose Drive Grade Separation Representing the Del Cerro Mobile Estates
- OCTA State College Blvd Grade Separation Representing the Fullerton Commerce Center and Fullerton Industrial Park