HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

June 11, 2010

Ms. Luciralia Ibarra
City Planning Associate
Expedited Processing Section
200 N. Spring Street, Room 721
Los Angeles, California 90012

RE: New (Year 2010) Traffic Count Data and Supplemental Evaluation for Three Intersections Near the Proposed 300-Unit Residential Project at 3rd Street and Ogden Drive, in the Park La Brea Community of the City of Los Angeles

Dear Ms. Ibarra,

As you may recall, at the recent May 19, 2010 public hearing on the proposed 300-unit residential project located at the southeast corner of 3rd Street and Ogden Drive (the site of the existing Ross Dress for Less store) in the Park La Brea community of the City of Los Angeles, one of the comments received related to the traffic count data and assumptions used in the analyses prepared by our firm. Specifically, the comment raised concerns that the traffic data used in the traffic study (dated "October 2009") was obtained when the project-adjacent Hancock Park Elementary School was not in session, and as such, the baseline traffic counts for the analyses were faulty, and as such, the traffic study did not accurately reflect the existing or future conditions in the study area.

In my response to the comment, I indicated that traffic counts for a recent update to the project traffic study had, indeed, been inadvertently been conducted when the school was not in typical operations, in late August and early September of 2009. However, as fully and specifically identified and discussed in the traffic study, our internal review of the 2009 count data revealed that the overall traffic volumes throughout the study area, not just at locations that may be effected by Hancock Park Elementary School traffic, exhibited substantial reductions in traffic for all moves at most intersections, with between 15 and 50 percent fewer "through" vehicles in one or more directions along major transportation corridors as compared to data our firm had collected at the study intersections in late January and early February of 2007 (as part of an earlier version of the project traffic study); these counts were conducted while the Hancock Park Elementary School and other area schools were in full, normal operations. While there is some general agreement that these traffic reductions are the result of the ongoing economic downturn, no specific cause of the lower traffic volumes has been identified.

Furthermore, in reviewing and comparing the 2007 and 2009 traffic count data, our concern was that, since a specific cause of the traffic reductions could not be identified nor its duration estimated, the use of the lower 2009 traffic counts would underestimate the traffic demands and

intersection operations for both the existing and forecast future conditions in the area. Therefore, as described in detail in the October 2009 traffic study, the traffic impact analysis did not use the more recent, but lower, year 2009 traffic data, but instead utilized the earlier year 2007 traffic data. These data were then "growth-factored" by 2.0 percent per year in order to estimate the then-current year 2009 traffic conditions, assuming that no economic slowdown or other circumstance had occurred to reduce area traffic volumes. This methodology is acceptable to the City Department of Transportation (LADOT) when using historical traffic count data, and in fact, the October 2009 project traffic study based on this methodology and data was reviewed and approved by LADOT on December 22, 2009. It is also of note that this methodology produced a "worst case" assessment of both "existing" and forecast future traffic conditions in the study area, since the 2007 traffic data was already higher than the 2009 data *before* it was growth-factored. The 2007 traffic count data also included traffic generated by the Hancock Park Elementary School, which was also growth-factored by 2.0 percent per year, although such traffic is not expected to increase substantially in the near future.

However, despite these responses and the review and approval of the traffic study by LADOT, your Department requested that new traffic count data be collected at three intersections in close proximity to the project site and the Hancock Park Elementary School, Fairfax Avenue and 3rd Street, 3rd Street and Ogden Drive, and Fairfax Avenue and Colgate Avenue, to assure that traffic conditions in the project vicinity had been accurately and adequately identified. Subsequent to the project's public hearing, several meetings with representatives of the Hancock Park Elementary School identified that the supplemental traffic counts would be conducted during the first week of June, 2010, while the school was in session. As a result of this agreement, the traffic counts were performed on Wednesday, June 2, 2010.

The results of the supplemental traffic counts at the three locations are contained in the attachments to this letter. Attached Figures A-1(a) and A-1(b) show a direct comparison between the "existing" (year 2009) intersection volumes used in the approved traffic study and the recent 2010 traffic counts. As shown in these figures, in most cases, the traffic volumes used in the project traffic study (year 2007 data growth-factored to represent 2009 conditions) are higher than their corresponding 2010 counterparts during both peak hours. However, it is also important to consider that the traffic volumes used in the October 2009 study correspond to year 2009 conditions; a more equitable comparison would further growth-factor the 2007 data to the year 2010 to match the more recent counts, yet even without this adjustment, the 2009 traffic estimates are generally the higher of the two data points. The supplemental year 2010 traffic count data sheets for the three intersections are contained in the attachments to this letter, as are the year 2007 traffic count data sheets; as noted earlier, this data was growth-factored to represent year 2009 conditions, and was used as the basis for the project traffic impact analyses documented in the approved October 2009 project traffic study.

A comparison was also made of the intersection operations for the "existing" conditions at each of the three subject locations using the traffic study values and the new 2010 data. This portion of the evaluation utilized the same Critical Movement Analysis (CMA) intersection analysis methodologies as were used in the project traffic study, including the same traffic signal operations and roadway geometries assumed in the original analyses. The results of these comparative analyses are summarized in attached Table A-1.

As shown in Table A-1, the intersection CMA values and levels of service reported in the project traffic study are higher than those obtained using the new 2010 data at each of the three intersections during both the AM and PM peak hours. The intersection of Fairfax Avenue and 3rd Street was reported in the traffic study as exhibiting LOS E conditions during both the AM and PM peak hours under the "existing" 2009 conditions, whereas this intersection actually currently operates at LOS D during both peak hours using the current 2010 data. Similarly, the intersections of 3rd Street and Ogden Drive, and Fairfax Avenue and Colgate Avenue both currently operate at better volume-to-capacity (CMA value) ratios using the current 2010 traffic data than were shown in the project traffic study, although both intersections indicate good operational conditions (LOS A or B) using either set of data. Again, the results of the supplemental traffic counts indicate that the approved traffic study presented reasonable and conservative assessments of actual existing conditions in the project vicinity.

Further, although the comparison of the traffic study "existing" 2009 and recent 2010 traffic data was the extent of the Planning Department's request, in order to assure that the traffic study's evaluation of future conditions in the area, including the identification of potential project impacts at the three subject intersections, an additional analysis was performed to identify the forecast "Future (2014) Without Project" and "Future (2014) With Project" conditions using the 2010 data. These analyses utilized the same CMA methodology, intersection operational assumptions, and project traffic volume additions as were used in the project traffic study, with the exception that the new 2010 traffic volumes were used as a baseline. The results of this analysis are summarized in Table A-2 in the attachments.

As shown in Table A-2, using the new 2010 data as the base condition, the project's incremental traffic impacts are once again less than significant at each of the three subject intersections. Table A-2 also contains an excerpt of the intersection CMA and LOS values and project impacts as identified in the approved October 2009 project traffic study, for ease of comparison of the traffic study results with the results of this supplemental analysis. As indicated by a comparison of these two tables, it can be seen that, as with the existing conditions analyses, the forecast future "Without Project" and "With Project" conditions are lower using the recent 2010 data than were indicated in the project traffic study, although overall intersection levels of service are generally comparable. Further, the project's incremental impacts at each of the subject intersections are also comparable between the two analyses, and

are less than significant at all intersections during both the AM and PM peak hours. The CMA worksheets for these supplemental analyses are contained in the attachments, along with excerpted CMA worksheets from the approved traffic study for the three subject locations.

Therefore, based on these supplemental analyses, the recent year 2010 traffic count data confirms that the approved October 2009 project traffic study accurately identifies the current traffic conditions and potential traffic impacts of the proposed project. In fact, the results of the supplemental analyses indicate that the approved project traffic study actually presents a more conservative assessment of area traffic volumes and existing (and subsequently, forecast future) intersection operations than would occur using current year 2010 data. As a result, the viability of the project traffic study has been verified, and as such, all potential project-related traffic impacts to the project area have been fully identified.

Please review the preceding and attached information, and feel free to contact me if you have any questions or comments.

Sincerely,

Ron Hirsch, P.E.
Principal

Attachments

Hirsch/Green
June 10, 2010
Draft

Ogden/3rd Residential Project
Critical Movement Analysis Summary
Existing (2009) vs. Existing (2010) Conditions

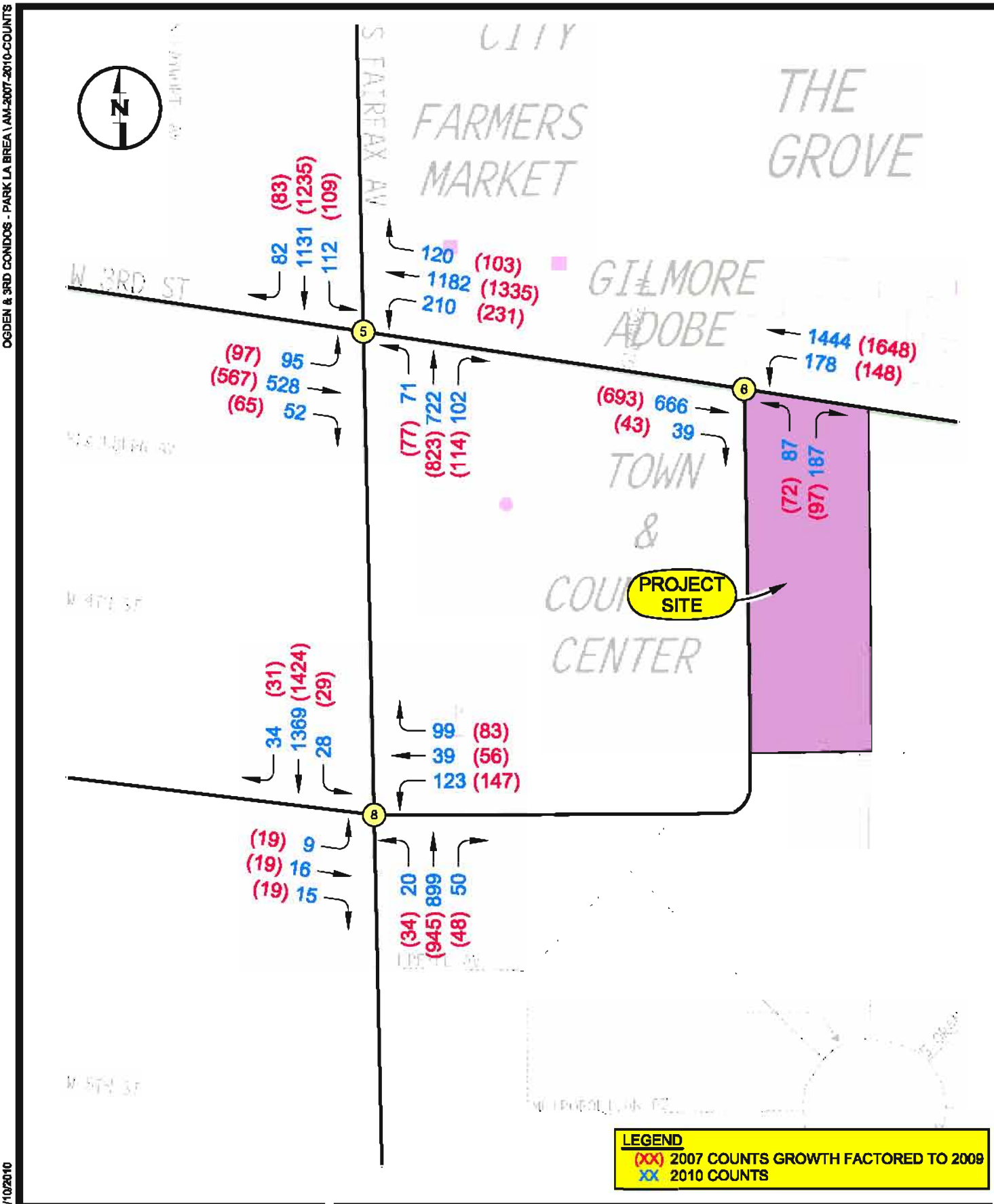
Traffic Study Data (2007 Counts Factored to 2009)

Int. No.	Intersection	Peak Hour	Existing (2009)		Future (2014) Without Project		Future (2014) With Project		
			CMA	LOS	CMA	LOS	CMA	LOS	Impact
5	3rd Street and	AM	0.995	E	1.365	F	1.368	F	0.003
	Fairfax Avenue	PM	0.959	E	1.408	F	1.396	F	-0.012
6	3rd Street and	AM	0.529	A	0.685	B	0.704	C	0.019
	Ogden Drive	PM	0.612	B	0.806	D	0.801	D	-0.005
8	Colgate Avenue and	AM	0.611	B	0.822	D	0.835	D	0.013
	Fairfax Avenue	PM	0.512	A	0.755	C	0.742	C	-0.013

Using New Year 2010 Count Data

Int. No.	Intersection	Peak Hour	Existing (2010)		Future (2014) Without Project		Future (2014) With Project		
			CMA	LOS	CMA	LOS	CMA	LOS	Impact
5	3rd Street and	AM	0.891	D	1.229	F	1.232	F	0.003
	Fairfax Avenue	PM	0.893	D	1.319	F	1.311	F	-0.008
6	3rd Street and	AM	0.468	A	0.605	B	0.624	B	0.019
	Ogden Drive	PM	0.602	B	0.780	C	0.755	C	-0.025
8	Colgate Avenue and	AM	0.561	A	0.752	C	0.766	C	0.014
	Fairfax Avenue	PM	0.507	A	0.745	C	0.733	C	-0.012

OGDEN & 3RD CONDOS - PARK LA BREA \ AM-2007-2010-COUNTS



6/10/2010

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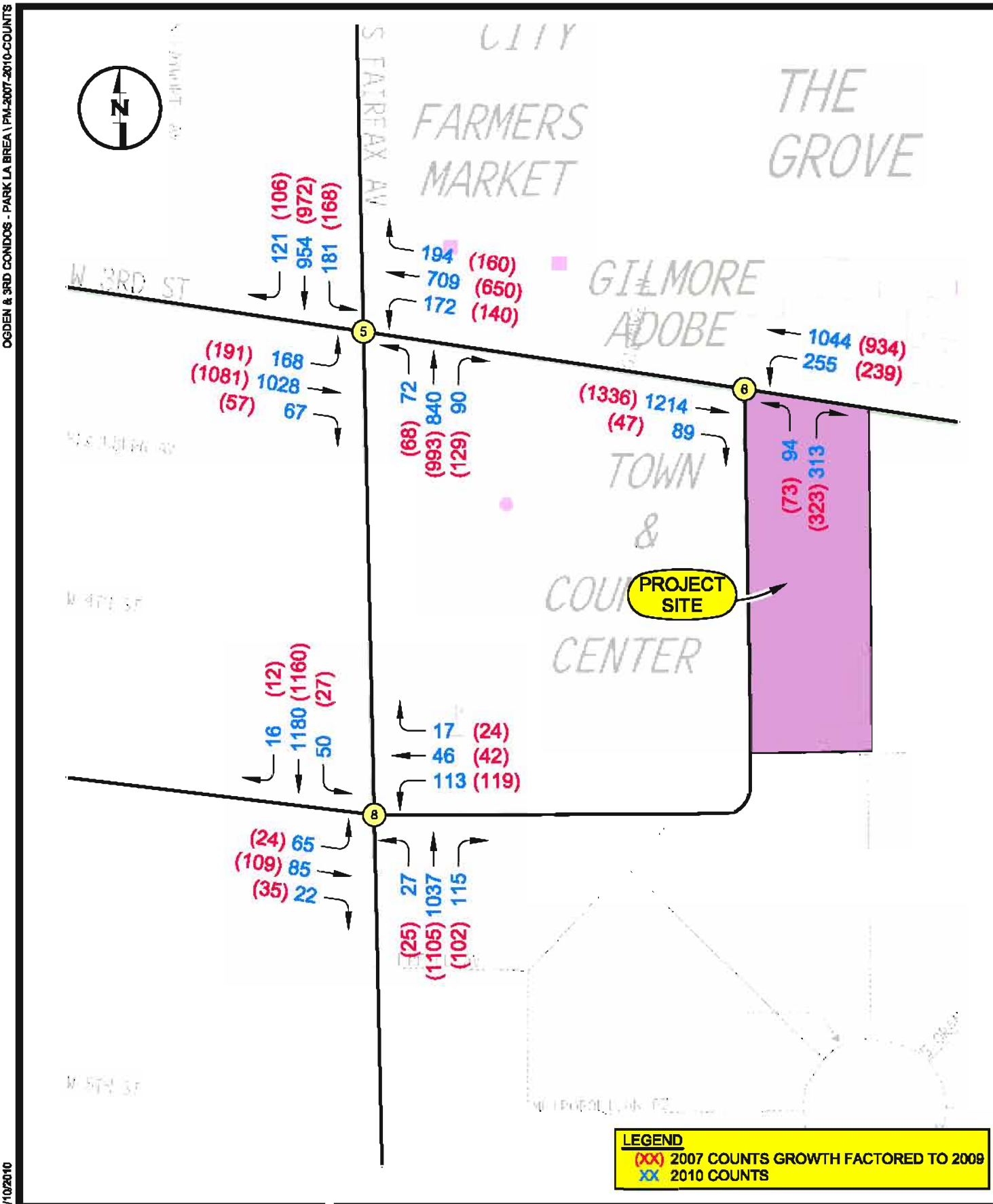
COMPARISON OF 2007 (GROWTH FACTORED TO 2009)
AND 2010 TRAFFIC COUNTS
AM PEAK HOUR

OGDEN & 3RD CONDOS - PARK LA BREA \ PM-2007-2010-COUNTS



6/10/2010

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COMPARISON OF 2007 (GROWTH FACTORED TO 2009)
AND 2010 TRAFFIC COUNTS
PM PEAK HOUR