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Mr. Morris Angell
Regional Environmental Quality Advisor & Senior Asset Manager
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**LOS ANGELES FBI FEDERAL BUILDING - DRAFT ENVIRONMENTAL IMPACT
STATEMENT**

Dear Mr. Angell,

The City of Los Angeles Department of Transportation (LADOT) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed construction of new facilities for the Federal Bureau of Investigation (FBI) at 11000 Wilshire Boulevard. The proposed development would provide approximately 937,000 square-feet of building space for office, storage and maintenance, a parking garage with 1,200 spaces, and surface parking for 750 spaces. The new facility is expected to house approximately 1,640 FBI employees. The project also proposes to renovate the existing 562,000 square-foot office tower for other non-FBI governmental agencies and is expected to accommodate a maximum of 2,300 employees. The proposed project would be constructed in two phases over a ten-year period.

Although LADOT was involved in initial scoping meetings with the project's traffic consultant and in the three meetings of the FBI Transportation Working Group, LADOT involvement has been limited to identifying study intersections and assisting in the preparation of a list of other development projects in the area. After this initial input, no further consultation with LADOT was sought during the preparation of the project's traffic impact study (Appendix C of the DEIS) nor in the identification of traffic mitigation measures - a customary step prior to public circulation of the environmental documents. The traffic impact study assumptions and results, as presented in Appendix C of the DEIS, were not approved by LADOT prior to publication.

Given the area infrastructure - known for excessive traffic delays and extreme traffic congestion, particularly along Wilshire Boulevard and on the I-405 Freeway - an effort should have been made to coordinate with LADOT, with the Los Angeles County Metropolitan Transportation Authority (Metro), and with the California Department of Transportation (Caltrans) during the preparation of the traffic study. Unfortunately, the traffic study and the traffic mitigation plan were prepared without input from these

agencies. With the project estimated to generate more than 1,000 trips during the a.m. peak commute hour, these agencies should have been consulted to assist in the preparation of the traffic impact study and in the design of a truly comprehensive transportation mitigation plan to address the project's traffic impacts.

LADOT offers the following comments on the FBI Project DEIS:

General Comments on the Traffic Study (Appendix C)

1. Trip Generation

The report indicates that the existing office tower currently houses 1,100 employees but can accommodate as many as 1,915 employees. In identifying the existing use trip credits needed to determine the total net increase in traffic expected of the project, the study incorrectly took credit for 1,915 employees. The trip generation estimates should be recalculated giving existing use trip credits only for the employees currently housed at the project site. Given that the traffic counts conducted at the study intersections do not include traffic from a fully-occupied office tower, it is inappropriate to take the full credit.

As stated in LADOT's traffic study guidelines (see below), to qualify for existing use trip credits, the current use must have been in place for at least six months in the last two years. Therefore, the existing use trip credits estimated for the 562,000 office tower should be recalculated to account solely for the current 1,100 employees working at the site - not the maximum of 1,915 employees that can potentially work at the site. The overall project net trip generation should be recalculated and the estimated project traffic assignment should be revised. This will likely change the results of the overall traffic impact analysis in a substantial manner (potentially identifying additional significantly impacted study intersections).

LADOT traffic study policies state:

"Any claim for trip credits for an 'existing' active land use which is applied to calculate net new trips requires that the 'existing' use was in place at the time of the existing base year traffic counts. Generally, for California Environmental Quality Act (CEQA) purposes this means the 'existing' use must have been in place for at least 6 months within the past 2 years."

2. Programmed Infrastructure Improvements

The study neglects to identify any of the programmed transportation improvements that will be constructed before the future study scenarios (years 2012 and 2017). Instead, the analysis simply assumes that the existing lane geometry at all of the 70 study intersections will remain unchanged through to project buildout year 2017. There are transportation improvements programmed

in the area that are required of other development projects, or have been initiated by LADOT that will be constructed prior to project buildout. There are improvements programmed along Sepulveda Boulevard, Overland Avenue, National Boulevard, Sawtelle Boulevard, and Wilshire Boulevard. Therefore, you are encouraged to work with LADOT staff to identify and list these transportation improvements that are expected to be implemented before the FBI project's buildout year. Since the lane configurations assumed at some of the study intersections may be revised, the volume-to-capacity ratios calculated at these study intersections would also need to be revised. Again, these corrections could lead to substantial changes in the conclusion of significantly impacted study intersections.

3. Neighborhood Street Impacts

The traffic study does not provide any discussion, analysis or mitigation of the potential for adverse project impacts on residential streets. With many of the area's major arterials operating at gridlock conditions during peak commute hours, the potential for commuter cut-through traffic through neighborhood streets should be evaluated. Neighborhood residents surrounding the project site have notified City of Los Angeles officials of the problem of commuter cut-through traffic through their streets. A new development as large as the proposed FBI project may exacerbate this problem. The preparation of a residential street impact analysis would attempt to identify residential streets that may be impacted by the project's traffic or by the redistribution of existing traffic due to the heavy presence of the project traffic. It is recommended that the GSA work with LADOT to prepare a residential street impact analysis. If it is expected that the project may lead to increased commuter cut-through traffic along residential streets, then the GSA is encouraged to work with LADOT, with City of Los Angeles Council Districts 5 and 11, and with affected neighborhood groups to develop a neighborhood traffic management plan.

4. Traffic Mitigations

Of the 70 intersections studied, the report indicates that the project will result in significant traffic impacts at 30 of the study intersections. Traffic mitigations are proposed at only four of the 30 impacted intersections. For the other locations, the report simply states that "no feasible traffic mitigation measures" are available. To offer only four intersection improvements and leave 26 out of 30 intersections unmitigated in an area that is already overly congested is simply unacceptable to the City of Los Angeles. Moreover, no attempt was made by GSA to work with LADOT on identifying potential mitigation measures. No freeway ramp or mainline improvements are proposed. With an office project of this size, an aggressive trip reduction program (especially for the non-FBI government employees) should have been included in the traffic mitigation plan, yet none is proposed. Also, Wilshire Boulevard is a principal transit arterial in the City of Los Angeles, yet no transit enhancements have been proposed.

LADOT has identified potential intersection improvements at several of the impacted intersections, for example, traffic signal enhancements are currently being evaluated at Pico Boulevard/Bundy Drive, at Olympic Boulevard/Westwood Boulevard, at Beverly Glen Boulevard/Pico Boulevard, and at Sepulveda Boulevard/Montana Avenue. Since these four intersections are negatively impacted by the project, GSA should work with LADOT to determine if these signal enhancements can mitigate the project's impacts.

With much of the area's infrastructure already fully built and with the high level of congestion experienced daily by commuters in this area, it is not expected that the project can fully mitigate all of its negative traffic impacts. However, given the excessiveness of the remaining unmitigated traffic impact locations, LADOT recommends that consideration be given to substantially downsize the project in an appropriate manner to limit the number of outstanding unmitigated traffic impacts. Nonetheless, it is recommended that GSA work with LADOT, Metro, and Caltrans to develop a comprehensive and meaningful traffic mitigation plan that includes intersection and roadway improvements, freeway access improvements, transit enhancements, an aggressive trip reduction program, and traffic signal upgrades.

5. Transportation Demand Management

As discussed in the section above, an aggressive Transportation Demand Management (TDM) plan should be developed to reduce the overall project's trip generation. Since the total project site is expected to house approximately 4,000 employees, there is an opportunity to develop an effective trip reduction program that encourages carpooling, vanpooling, and transit usage. Reducing the project's trip generation is a viable traffic mitigation option.

Given the infrastructure's peak period gridlock conditions, the existing and planned high-occupancy vehicle (HOV) lanes on the I-405 Freeway, and the existing Metro Rapid Bus service provided along Wilshire Boulevard, there is already an inherent incentive for the project's employees to search for alternative commute options other than driving alone. The TDM plan should include, but not be limited to, the following elements:

- staggered employee start and end times
- alternative work schedules (3/12, 4/40, 9/80 plans)
- telecommuting opportunities
- parking policies to encourage carpooling and vanpooling
- transit cost subsidies

6. Intelligent Transportation Systems

To enhance the transportation infrastructure in this area, Intelligent Transportation Systems (ITS) improvements designed to better manage

incidents (like accidents on the I-405 Freeway, demonstrations at the Federal Building, roadway construction, etc.) should play a key role in the overall project traffic mitigation plan. ITS strategies (including computerized signal and surveillance systems, changeable message signs, and highway advisory radio) can provide improved incident management and route guidance for area motorists.

Specific Comments on the Traffic Study (Appendix C)

1. Figures 4a and 4b (Intersection Geometry) illustrate the lane configuration for each of the 70 study intersections. A comparison of these figures to the level-of-service (LOS) worksheets reveal that in eight of the study intersections, the lane configuration illustrated in Figures 4a and 4b does not match the lane configuration assumed in the LOS worksheet. Please check the lane configuration at study intersection numbers 4, 7, 9, 17, 39, 42, 44 and 53 for consistency with the LOS worksheets.

At study intersection 23 (Wilshire Boulevard/Sepulveda Boulevard), the assumed existing lane configuration for the eastbound approach is incorrect. The eastbound approach is currently striped as follows: 1 left-turn lane, 3 through lanes, and 1 shared through/right-turn lane. Also, the existing lane configuration assumed for the northbound approach at intersection 63 (Overland Avenue/Pico Boulevard) is incorrect. The northbound approach is currently striped as follows: 2 left-turn lanes, 1 through lane, 1 shared through/right-turn lane, and 1 right-turn lane.

2. On Table 2, page 20, of the traffic study, the existing volume-to-capacity (V/C) ratios estimated at the intersections of Wilshire Boulevard at Westwood Boulevard and of Wilshire Boulevard at Gayley Avenue are too low for both peak hours. When estimating the V/C ratio at these intersections, the default capacity used by the Critical Movement Analysis (CMA) procedures is not appropriate. Based on various field reviews of the Wilshire corridor along this segment, traffic is often severely delayed due to the congestion levels on the I-405 Freeway. These intersections operate at V/C ratios that are much higher than what has been reported. Please override the capacity used in the CMA worksheets accordingly to account for the actual congested conditions experienced along Wilshire Boulevard.
3. In the future year LOS summary tables (Tables 6, 10 and 11), it is indicated that the future V/C ratio at some of the study intersections is greater than 1.5, which is unlikely. These results are likely due to unrealistic traffic projections. It is recommended that you work with LADOT to evaluate the overall traffic

distribution of the related projects and of the proposed project. Doing so can provide a reality check of the traffic projections.

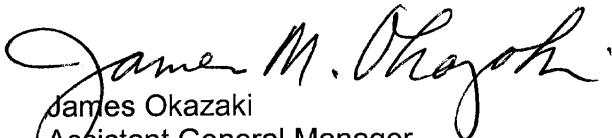
4. The report consistently reveals that 30 of the study intersections will be adversely impacted by the project's traffic. However, under Section B, starting on page 95, only 28 locations are identified as being impacted. The report neglects to include two of the impacted intersections (Sepulveda Boulevard at Olympic Boulevard and Sawtelle Boulevard at Ohio Avenue) and does not propose any traffic mitigations for these intersections.
5. On page 96, the proposed intersection improvement at Beverly Glen Boulevard (West) and Sunset Boulevard is not acceptable since it conflicts with a planned improvement initiated by LADOT. Lane configuration drawings for the other three intersection mitigations proposed and discussed in this section of the DEIS should be submitted to LADOT for review. Consultation with LADOT is necessary to review any proposed traffic mitigation measures and to evaluate all impacted intersections.
6. Figures 29a and 29b attempt to illustrate the proposed intersection geometry at the impacted locations for which mitigations are proposed. These figures summarize what is discussed on pages 95 through 99 of the traffic study. However, there are some inconsistencies. For example, a new lane geometry is proposed for intersection number 21, yet the report does not identify this intersection as impacted. Also, for intersections 15, 51 and 65, the figures state that no mitigations are required, yet these intersections are significantly impacted by the project. For intersection 41, the figure indicates that there is no feasible mitigation, yet the report does not list this intersection as an impacted location. Please review Figures 29a and 29b and check for consistency with other sections of the report.
7. On page 107, on the second paragraph, the report refers to an assumed ambient traffic growth rate of 2% per year; however, in other sections of the report, the study indicates that an ambient rate of 1% per year was used. Please verify which ambient growth rate was used in preparing the future traffic volumes.

Conclusion

The traffic analysis from the DEIS is filled with errors, omissions and inconsistencies as stated above. Fundamentally incorrect assumptions regarding existing use trip credit have been made in the study. Furthermore, all of these technical errors will have substantial and material impact on the conclusion of the traffic analysis. Therefore, it is imperative that the traffic analysis be properly re-done to correct the current technical deficiencies so as to properly account for the significantly impacted study locations and appropriately address the excessive number of unmitigated study intersections. It is recommended that GSA work with LADOT to revise the traffic impact study, to prepare a residential street impact analysis, and to develop a comprehensive traffic mitigation program that attempts to address the various significant impacts expected of the project.

If you have any questions, please contact Jay Kim or Tomas Carranza of my staff at 213-972-8476 and 213-485-1062, respectively.

Sincerely,


James Okazaki
Assistant General Manager

- c: Councilmember Jack Weiss, District 5
- Councilmember Bill Rosendahl, District 11
- Gail Goldberg, City Planning
- Jay Kim, LADOT
- Tomas Carranza, LADOT