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May 23, 2018

David Wright, Sunset Coalition
Wendy-Sue Rosen, Brentwood Residents Coalition
11845 Chaparal Street
Los Angeles, CA 90049

Via email: zofia.wright@gmail.com

Traffic and Circulation Issues – Regarding the proposed Mount Saint Mary's University Expansion

Dear Mr. Wright and Ms. Rosen:

This is a summary of my review of traffic issues and impacts related to the current operations of Mount Saint Mary's University (MSMU) and the proposed expansion of the Chalon campus at 12001 Chalon Road in Brentwood. I have 30 years of experience in the field of transportation engineering and planning and until recently I held the position of Chief of the Los Angeles Department of Transportation (LADOT) Bureau of Planning and Land Use Development. In that role, I was responsible for managing a staff of 38 professionals and serving as the key department liaison between the development community and City Council on traffic mitigation and transportation planning issues, including supervision of the completion of numerous project EIRs for the City of Los Angeles. I also have extensive experience working closely with residential neighborhood associations and developers to negotiate consensus on traffic mitigation measures in association with proposed development projects. Attached is **EXHIBIT 1** with a complete summary of my credentials.

As you know, having reviewed school traffic issues regarding the Archer School and the Brentwood School in concert with your neighbor homeowner associations, I have specialized knowledge of school expansion programs in Brentwood and related traffic congestion issues affecting the Sunset Boulevard Corridor west of the I- 405 Freeway. Further, I held the position of Transportation Planning Bureau Chief for the LADOT in 1984, when MSMU submitted their application for conditional use for a parking structure. The application was reviewed and commented on by my department. **It is important to note that the review at that time was in no way intended to be a finding of entitlement for increased attendance of the campus.**

Review of Prior Documents

As mentioned above, I was Transportation Planning Bureau Chief at LADOT in 1984, when the Initial Study Traffic Analysis document (**EXHIBIT 2**) was signed by LADOT Traffic Engineer Charles King, and, at that time, I was his immediate supervisor. With direct knowledge of procedures in place at LADOT, I am especially qualified to interpret the findings of the Initial Traffic Study Analysis and the associated approval for the parking structure.

In an effort to evaluate the background for MSMU's current operational conditions, I have reviewed a number of historical documents that have been submitted to or issued by the City in reference to past entitlements and the current application for expansion (ENV-2016-2319-EIR). The Initial Study Traffic Analysis report by LADOT from March 28, 1984, was issued in response to an application to build a 244-space parking structure on top of an existing parking lot (EIR Case No: 113-84-CUZ). The important note on that document is that LADOT, pursuant to CEQA, did not require a traffic analysis of the requested permit and recommended a finding of **NOT SIGNIFICANT** impact for traffic "**Provided that no enrollment increase is allowed**." During that time, MSMU's enrollment was approximately 750 students (see the January 1984 CUP for the Faculty Residence Building). From the project description it is clear that the request was to build a parking structure and not for an enrollment increase. That is how the City should have processed the entitlement. If the City instead permitted an increase of enrollment to 1,072 students (a 43% increase without additional traffic analysis and new environmental review), that would be a critical error.

Additionally, the July 1984 CUP approval was for a parking structure only --- with a condition that tied the ratio of students to the number of parking spaces in that structure. It did not address the remaining parking spaces on campus that were required by code. The current MSMU Draft EIR includes a misleading assumption which asserts that the ratio of 1 to 4 parking spaces to students applies to all of the parking on campus.

Contrary to what MSMU asserts, LADOT issued the "NOT SIGNIFCANT" traffic impact determination for the July 1984 CUP with the condition that enrollment would not increase. If the permit was to provide for increased student enrollment, LADOT would have required further assessment of the added vehicle trips to determine the need for a traffic study and ultimate assessment of traffic impacts.

Parking Requirements for Universities

As stated above, there are documents in the current application for expansion that stipulate the parking garage entitles the University to expand the number of students. In the field of transportation planning and engineering, as it applies to the City of Los Angeles, there is no documentation or guidelines that the provision of parking spaces generates additional traffic. Thus, the number of parking spaces is not considered a determination of the amount of traffic impact. Generally, the provision of adequate parking is a mitigation of neighborhood traffic impacts with regards to parking over-flow.

EXHIBIT 3 is a summary of a national data base (Institute of Transportation Engineers)

regarding existing parking demands for universities. On average, the peak demand for parking at urban universities exceeded 0.22 parking spaces per student. A conservative practice would be to compare parking needs to the 85th percentile data (statistics which are exceeded only 15% of the time) implying a parking demand of 0.29 parking spaces per student. These data included all visitors to the surveyed universities – including students, staff and visitors.

In comparison, the City parking requirements for learning institutions are not calculated upon the number of students, but rather, based upon an analysis of allocated square feet. Generally, the City requires only one space per 500 square feet with Auditoriums and administration office space treated separately (see **EXHIBIT 4**). **There is no basis in City of Los Angeles entitlements to calculate student enrollment based upon the number of parking spaces provided.**

Existing Roadways Are Inadequate for Current Traffic

EXHIBIT 5 shows the route to the campus from the Sunset Boulevard Corridor, namely Bundy Drive, Norman Place and Chalon Road. According to the Circulation maps from the latest adopted Brentwood-Pacific Palisades Community Plan and the Circulation Element of the Citywide Plan, all roads to the MSMU campus are designated as "local" roads (see **EXHIBIT 6**). This appears to be in conflict with more recently adopted designations from the Baseline Hillside Ordinances (Ordinance No. 181,624 and Ordinance # 168,159), wherein these roads are designated as "Hillside Limited Streets." In both of these criteria, the intention of these roads is that they **"are intended to accommodate lower volumes of vehicle traffic."**

The City standard for determining roadway width is based upon the street designation. documented in the recently adopted Complete Streets Design Guidelines. **EXHIBIT 7** is a summary of what the City expects for "local" roadways pursuant to the recently adopted Complete Streets Design Guidelines in which the requirement is for 36-foot wide streets. **EXHIBIT 8** shows that the requirement for Hillside Limited Streets is that the paved part of the street be at least 20-feet wide.

During my field investigation, I measured these roads and found the roadway width to narrow from 30 feet wide (nearest to Sunset Boulevard) down to less than 19 feet wide on Norman Place in its approach to Chalon Road which is the entrance to the campus. As evidenced by pictures of the route which are attached in **EXHIBIT 9**, these roads are very narrow, windy, lacking sidewalks and with limited sight-line. **Those sections of roadway below 20-feet are substandard by any of the City applicable standards and unsafe for two-way traffic.**

MSMU proposes to add shuttles and busses to accommodate increased student population and events. The addition of busses to the mix of existing traffic would necessitate wider roadway widths as well as engineering design accommodations such as pavement thickness and minimum sight-line requirements. As evidenced by pictures in **EXHIBIT 10**, large busses bringing visitors to the MSMU campus got stuck on Saltair Ave, a very narrow, substandard road.

Additionally, these substandard roads in a high fire area, are inadequate for the amount of current and future traffic generated by Mount St. Mary's University.

Consideration of Other Major Projects in the Sunset Corridor

There have been two major development project approvals with significant impacts on the Sunset Boulevard Corridor: Archer School and Brentwood School – both expansions of existing school sites. **EXHIBIT 11** is a summary table of expected traffic impacts for these sites as reported in the Archer School Traffic Study. Traffic conditions projected to be Level of Service (LOS) E or F (unacceptable according to City Policies) at the following 6 intersections in the Sunset Corridor:

- Bundy Drive
- Saltair Avenue
- Barrington Avenue
- Barrington Place
- Church Lane/I-405 Freeway
- Veteran Avenue

All of these intersections are also expected to be traversed by MSMU students, faculty and visitors. The Draft EIR must take these cumulative impacts into consideration using the proper baseline of enrollment permitted.

SUMMARY

In conclusion, from the documents I have reviewed, the July 1984 CUP approval did not include any condition allowing an increase in enrollment and MSMU appears to be operating with an enrollment number in excess of any City approvals.

The increased enrollment on MSMU's campus without the City's review and imposition of mitigation measures has added to the unacceptable traffic conditions in the Sunset Corridor. In my opinion, based on the current traffic and extent of substandard roadways serving access to the MSMU campus from Sunset Blvd, **the proposed expansion of the University will be significantly impactful to the community.**

Please contact me if you have questions.

Very truly yours,

Allyn D. Rifkin, PE

EXHIBIT 1

Allyn Rifkin, P.E.
Experience and Qualifications

Mr. Rifkin has over 30 years experience in the field of transportation engineering and planning. Included in that experience are assignments in both the private and public sectors, ranging from consultant for developers to research for the Automobile Club of Southern California. Until recently, he was the Chief of the Los Angeles Department of Transportation's Bureau of Planning and Land Use Development, responsible for managing a staff of 38 professionals and serving as the key department liaison between the development community and City Council on traffic mitigation and transportation planning issues. He supervised the completion of numerous project EIRs for the City of Los Angeles. His latest projects focused on transit oriented development along various rail alignments in the Los Angeles area. As a private consultant, Mr. Rifkin has worked closely with residential neighborhood associations and developers to negotiate consensus on traffic mitigation measures in association with proposed development projects. Other consultant efforts of interest include assistance to the Eagle Rock neighborhood in the formation of the Colorado Boulevard Pilot Community Parking program and to County Supervisor Yaroslavsky in the initial proposal to convert Olympic and Pico Boulevards into a one-way pair. On the Westside of Los Angeles, Rifkin has worked with the Brentwood Homeowners and other neighborhood groups seeking traffic mitigation of expanding private schools along the Sunset Boulevard corridor.

Professionally, Allyn is active in the Urban Land Institute (ULI) and the Institute of Transportation Engineers (ITE), and has served as the president of the ITE'S largest Chapter of ITE, the Southern California Chapter, with over 1,100 members. In addition to serving on the ITE National Transit and Transportation Planning committees, he has been instrumental on national steering committees for the ITE Trip Generation Committee and the Urban Goods Movement Committee. He has lectured extensively on the topics of traffic impact mitigation and on neighborhood traffic controls.

His college education began with a B.S. in Systems Engineering at UCLA and led to an M.S. in Transportation Engineering at Northwestern University. Rifkin is nationally recognized for his expertise in travel demand forecasting. His more recent work has involved traffic plans to relieve congestion in various hot spots of development in Southern California including the South Coast Plaza area of Orange County, Downtown Los Angeles, Westwood, the LAX Transportation Corridor (the initial area in Los Angeles to adopt a traffic impact mitigation fee), and Warner Center.

He was involved in the creation of five transportation trust funds with current balances exceeding $23 million for transportation improvements. In his role as mediator of development traffic impact Mr. Rifkin launched a neighborhood traffic safety program currently exceeding $1.5 million in neighborhood traffic controls and negotiated pedestrian safety mitigations from the Los Angeles Unified School District.

EXHIBIT 2

INITIAL STUDY
TRAFFIC ANALYSIS

EIR CASE NO.: 113-84-CU2 TRANSMITTAL DATE: 3-28-84

PROJECT DESCRIPTION: Cond. Use for a 4 story, 80,000 sq. ft. parking structure for 244 cars located on the Mt. St. Mary's College property on 45.5+ acres, zoned RE40-1-H.

PROJECT LOCATION: 12001 - Cholon Rd.

EXISTING ZONES: RE40-1-H PLANNED ZONES: RE40-1-H

PROJECTED GENERATED TRIPS: —

Bundy Dr. (Street) ADT 240 TPH 35

(Street) ADT TPH

CRITICAL INTERSECTIONS:

& &

	AM	PM		AM	PM
NB					
SB					
EB					
WB					

COMMENTS: * Provided that no enrollment increase is allowed.

IMPACT OF TRAFFIC GENERATION:

NOT SIGNIFICANT	MAY BE SIGNIFICANT	MAY BE CUMULATIVE	TRAFFIC STUDY NEEDED
X *			

Prepared by: [signature] Date: 4/4/84

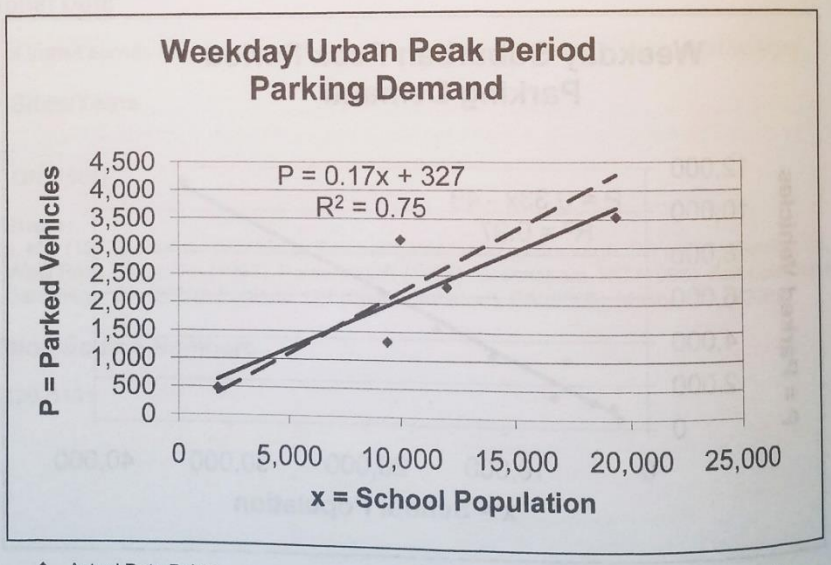
CP-1206 (3/79)

EXHIBIT 3 – NATIONAL PARKING DATA FOR UNIVERSITIES

Land Use: 550
University/College

Average Peak Period Parking Demand vs. School Population
On a: Weekday
Location: Urban

Statistic	Peak Period Demand
Peak Period	10:00–11:00 a.m.
Number of Study Sites	5
Average Size of Study Sites	10,500
Average Peak Period Parking Demand	0.22 vehicles per school population
Standard Deviation	0.07
Coefficient of Variation	32%
Range	0.14–0.31 vehicles per school population
85th Percentile	0.29 vehicles per school population
33rd Percentile	0.18 vehicles per school population



Institute of Transportation Engineers [156] Parking Generation, 4th Edition

EXHIBIT 4

City of Los Angeles
Summary of Parking Regulations

	Use of Building (or portions of) Commercial uses	Ratio (spaces/sq. ft.)
Regular Provisions Sec. 12.21A4	1. Health or Athletic Club, Bath House, Dance Hall/Studio, Gymnasium, or similar (e.g. amusement)	1 per 100
	2. Restaurant, Café, Coffee Shop, Bar, Night Club, or similar	1 per 100
	3. Small Restaurant, Café, or Coffee Shop (1000sq. Ft. or less)	1 per 200
	4. Take-out Restaurant (no eating on the premises)	1 per 250
	5. Retail or Discount Wholesalers	1 per 250
	6. Retail Furniture, Major Appliances, or similar	1 per 500
	7. Auditoriums: Church, High School, College, Stadium, Theater, and similar assembly	1 per 35 or 1 per 5 fixed seats
	8. Elementary School, Child Care	1 per classroom or minimum 1per 500
	9. Commercial School: Trade, Music, Professional, or similar	////////////////////////////////////
	a) Classrooms and assembly areas	1 per 50 or 1 per 5 fixed seats whichever is greater
	b) Classrooms with heavy equipment	1 per 500
	10. Philanthropic Institution, Government Office, or similar	1 per 500
	11. Commercial or Business Office	1 per 500
	12. Medical Office, Clinic, or Medical Service Facility	1 per 200
	13. Hospital	2 per bed
	14. Sanitarium or Convalescent Home	1 per 500 or min 0.2 per bed
	15. Warehouse or Storage (for Household Goods) - first 10,000 sq. ft. - beyond 10,000 sq. ft.	1 per 500 (plus) 1 per 5000
	16. Other Business or Commercial (not listed above)	1 per 500
Special Provisions	17. Auto Dismantling Yard, Junk Yard or Open Storage in the M2 or M3 zones [Sec. 12.19A4 (b)(4)]	6 for the first acre, 1 per 12,000 sq. ft. for the second acre and 1 for each acre over two.

Zoning Section - Department of Building & Safety *(LADBS)*

EXHIBIT 5 – ACCESS ROUTE TO MSMU CAMPUS

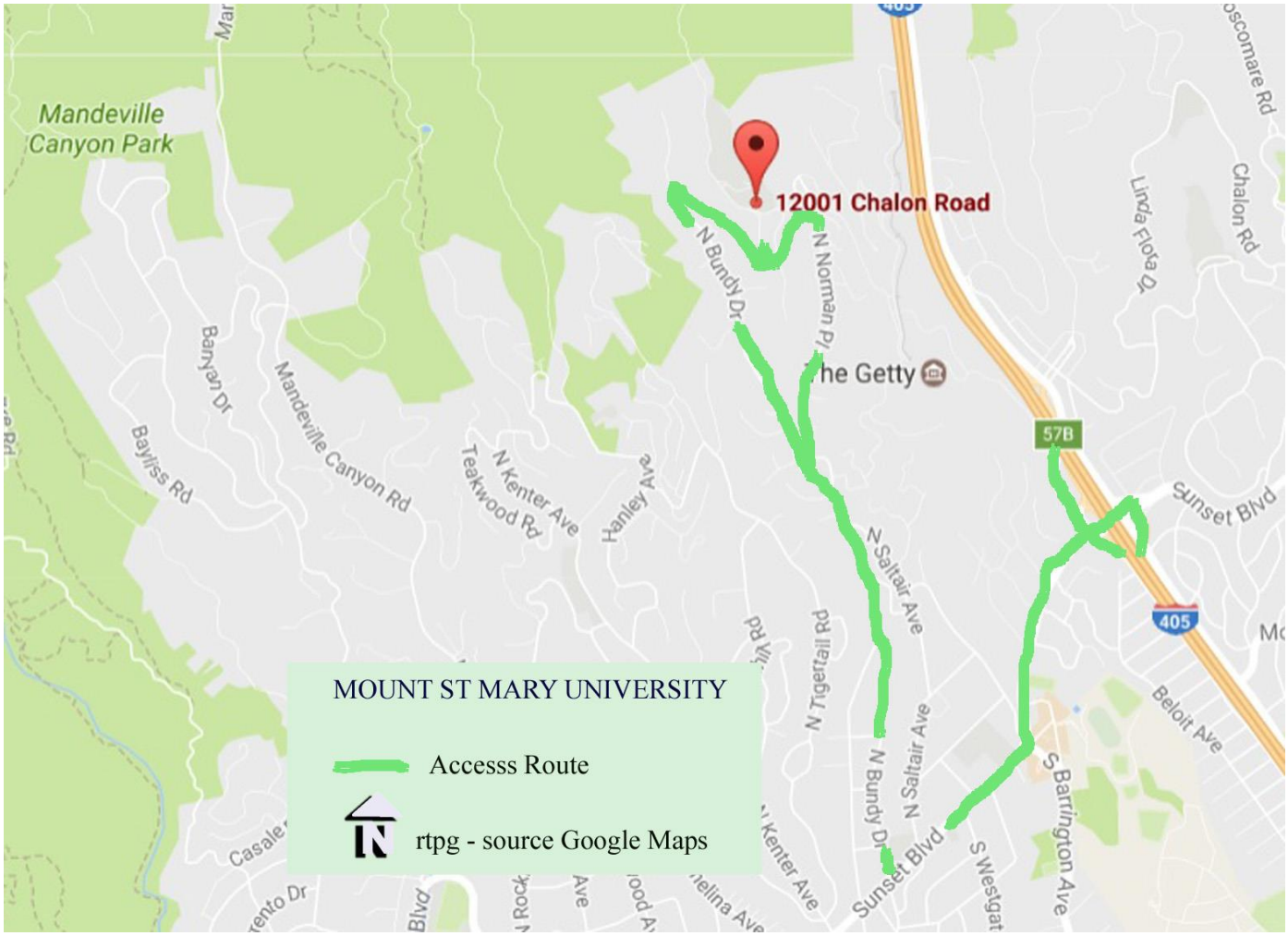


EXHIBIT 6 - CIRCULATION ELEMENT for BRENTWOOD/PACIFIC PALISADES COMMUNITY PLAN

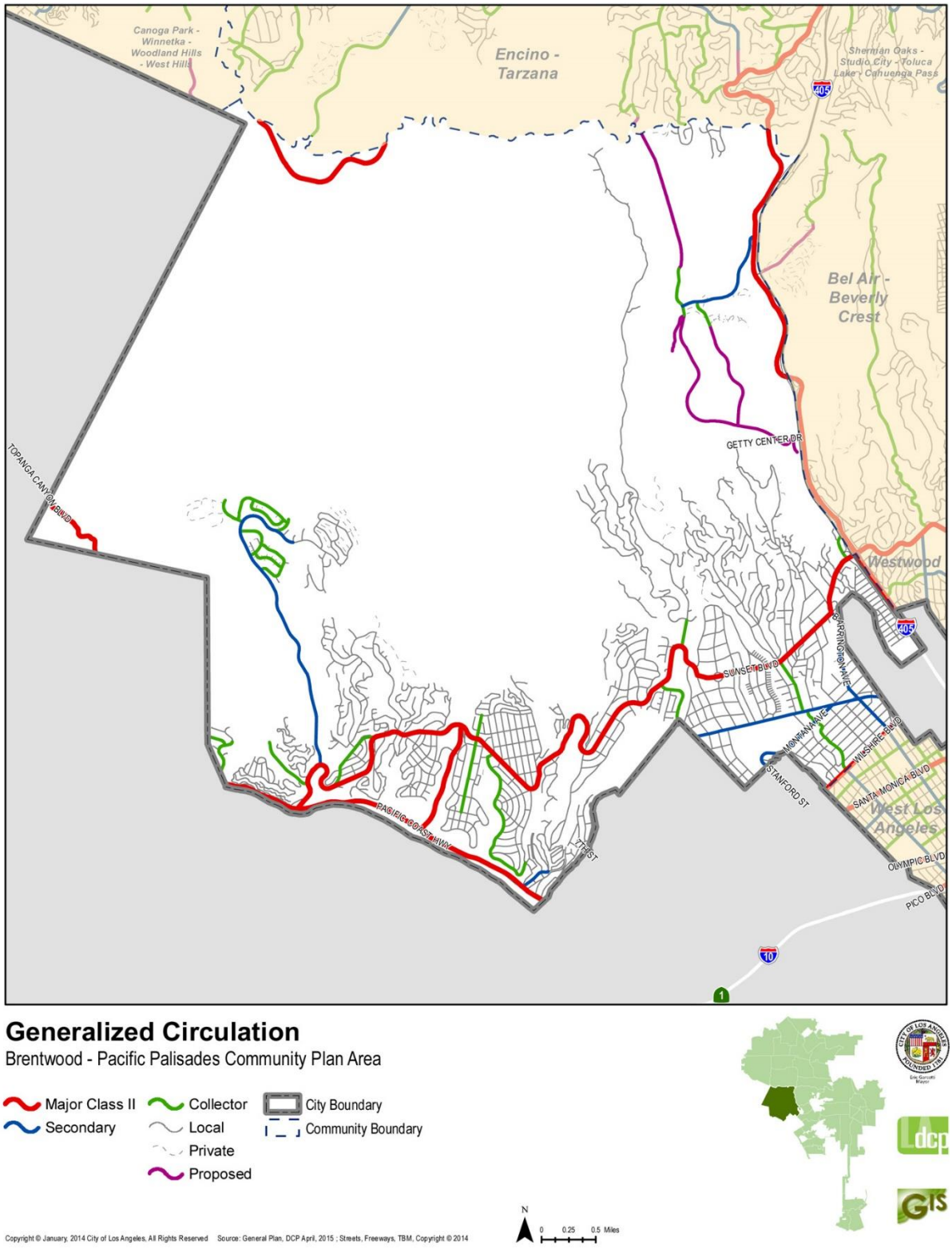


EXHIBIT 7- CITY OF LOS ANGELES STANDARD STREET CROSS SECTIONS for a LOCAL STREET

Local Street Standard

Local streets are intended to accommodate lower volumes of vehicle traffic. Local streets have one lane in each direction and have parking on both sides of the street.

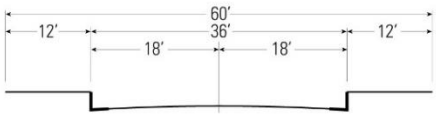
Roadway Width: 36 ft.

Right-of-Way Width: 60 ft.

Typical Number of Lanes: 1 lane in each direction

Typical Sidewalk/Border Width: 12 ft.

Target Operating Speed: 20 mph



Local Street Limited

These are local streets that lead to a dead-end rather than providing through traffic.

Roadway Width: 30 ft.

Right-of-Way Width: 50 ft.

Typical Number of Lanes: 1 lane in each direction

Typical Sidewalk/Border Width: 10 ft.

Target Operating Speed: 15 mph

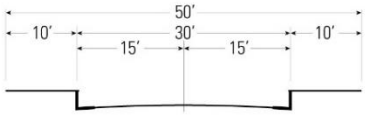


EXHIBIT 8 - CITY OF LOS ANGELES STANDARD STREET CROSS SECTION for a STANDARD HILLSIDE LIMITED STREET (example)

DEPARTMENT OF BUILDING AND SAFETY/ DEPARTMENT OF PUBLIC WORKS
***PRELIMINARY REFERRAL FORM FOR**
☐ **BASELINE HILLSIDE ORDINANCE No. 181,624**
☐ **HILLSIDE ORDINANCE No. 168,159**

CPC-1952-4072

Building and Safety Date: 05/17/2016 PIN: 141B141-5

Address: 12001 W CHALON ROAD
District Map: 144B137 Tract: P M 4304
Block: Lot: A
APN: 4429003027

Applicant: _____
Project Description: _____
Phone: _____
Fax: _____
PCIS No.: _____

Public Works:

Vehicular Access:

1. Is the Continuous Paved Roadway (CPR)* at least 28ft wide from the driveway apron of the subject lot to the boundary of the Hillside Area? ☑ Yes ☐ No
2. Is the CPR at least 20ft wide, from the driveway apron of the subject lot to the boundary of th[illegible] ☑ Yes ☐ No
3. Is the street a[illegible]acent to the subject lot at least 20ft wide? ☑ Yes ☐ No
   (Note: all streets [illegible]ltiple street frontages, such as a corner lot or a through lot.)

* CPR = begins at the driveway apron and must be continuous and without permanent obstacles to the boundary of the Hillside Area.
If "2" and "3" are Yes: COMPLY WITH HILLSIDE ORD. ZA APPROVAL IS NOT REQ'D
If "2" or "3" are No: REFER TO PLANNING FOR APPROVAL PER 12.24X21 OR 12.24X28

Street Type:

1st Street Name: CHALON ROAD R/W width: 42' Roadway width: 32'

☒ Lot fronts on a standard hillside limited street ☐ Dedication required width: ____ Plan Index: 19502
☐ Improvement required

Comments: _____

2nd Street Name: _____ R/W width: _____ Roadway width: _____

☐ Lot fronts on a standard hillside limited street ☐ Dedication required width: ____ Plan Index: _____
☐ Lot fronts on a sub standard hillside limited street ☐ Improvement required

Comments: _____

Sewer Connection:

Lot located less than 200 ft from sewer mainline:
☐ Use existing wye and permit ☐ Obtain new connection and new permit
☒ Use existing wye, obtain new permit ☐ Obtain B-Permit from PW/BOE to construct new mainline

Lot located greater than 200 ft from sewer mainline:
☐ Obtain LADBS approval for on-site sewer ☐ Obtain B-Permit from PW/BOE to construct new mainline

Public Works Employee completing this form:
Sign: _____ Print Name: Hisashi Kobayakawa
Date: 5-17-2016 Phone: 310-575-8384 Location: WLA

* The final determination of Hillside Ordinance applicability shall be made after any and all dedications/improvements (if required) have been made.

EXHIBIT 9 - PHOTOS OF ACCESS ROUTE

Bundy Drive

Norman Lane

MSMU Buses Turning onto Norman Lane

Neighbor Traffic Concerns on Bundy Dr

EXHIBIT 10 – MSMU BUS STUCK ON SALTAIR

July, 2017

EXHIBIT 11 - SUNSET BLVD INTERSECTION LEVELS OF SERVICE

Table IV.K-8
Future (Horizon Year 2020) Base Conditions Intersection Level of Service—Non-Event Day

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Future (2020) V/C	Future (2020) LOS
1	Cliffwood Ave.	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.535 0.485 0.370	A A A
2	Kenter Ave.	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.746 0.781 0.571	C C A
3	Bundy Dr.	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.581 1.167 1.344	A F F
4	Saltair Ave.	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.665 1.058 1.215	B F F
5	Barrington Ave.	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.961 1.449 1.474	E F F
6	Barrington Pl.	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.815 0.966 0.997	D E E
7	Church Ln.	I-405 SB Ramps	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.675 0.793 0.883	B C D
8	Church Ln.	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.927 0.785 0.861	E C D
9	I-405 NB Ramps	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.857 0.544 0.554	D A A
10	Veteran Ave.	Sunset Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.726 0.798 1.022	C C F
11	Bundy Dr. (W)	San Vicente Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.573 0.678 0.709	A B C
12	San Vicente Blvd.	Montana Ave.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.786 1.022 0.993	C F E
13	Barrington Ave.	Montana Ave.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.481 0.788 1.121	A C F
14	Barrington Ave.	San Vicente Blvd.	7–8 A.M. 3–4 P.M. 5–6 P.M.	0.671 0.725 0.453	B C A