

South Brentwood Residents Association
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January 30, 2015

Sergio Ibarra
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, California 90012
Via email: sergio.ibarra@lacity.org

Re: Martin Expo Town Center
12101 West Olympic Boulevard
Case Number: ENV-2012-3063-EIR
State Clearinghouse Number: 2013031057

Dear Mr. Ibarra,

I am writing on behalf of the board and members of the South Brentwood Residents Association (SBRA). SBRA represents approximately 13,000 home-owners and renters who reside in the area south of San Vicente Blvd., north of Wilshire Blvd., east of Centinela and west of Federal. Additionally, SBRA represents the interests of those in multi-family dwellings throughout the entire Brentwood Community.

SBRA submits the following comments to the DEIR of the Martin Town Expo Center. Our organization strongly opposes this project as currently proposed.

At over 800,000 square feet, the project is much too large for the West LA/Brentwood region, which is already gridlocked during peak hours as thousands of commuters from throughout LA County drive to and from work in West LA and Santa Monica every day. All of the major east-west streets in our region including Pico Blvd., Olympic Blvd., Santa Monica Blvd., Wilshire Blvd., San Vicente Blvd., Montana Avenue, and Sunset Blvd. and the I-10 are already over-capacity, as is the I-405.

As the DEIR notes, 18 of the 56 intersections studied already operate at a level of service "E" or "F." The DEIR fails to note that another 12 intersections currently operate at an LOS "D"--- *meaning that 2/3 of the signalized intersections in this area already operate at unacceptable levels.*

The DEIR states that 16 of these intersections will be worsened to a level that is significant as the result of this project, and 18 by 2030. Numerous others will be worsened but not to "significant" levels under CEQA. This level of impact by a single project is simply unacceptable.

Bundy Drive is a particularly important artery for Brentwood residents as it is the primary route from Brentwood to the I-10 freeway and one of only two north-south streets (the other being Barrington Avenue) that extend from the I-10 freeway to Sunset.

Westside residents and commuters are well aware that gridlock on one street causes a chain reaction throughout the entire region as drivers shift their journeys to other streets as far north as Sunset Blvd. in (unsuccessful) attempts to find streets that are not gridlocked.

It is evident from the DEIR that the Martin Town Expo project would substantially add to the horrendous traffic that already exists in our area, *yet the project's DEIR is deficient in that it greatly understates the impact that this project will have on traffic in the region.*

In addition to the traffic, the very large and unsightly billboard embedded in the front of the project creates a significant negative impact on aesthetics in the area.

SBRA also opposes allowing the applicant to submit this as a "Conceptual Plan" under the Land Use Equivalency Program and Design Flexibility Program (LUEP). The applicant must be required to submit the project that it actually proposes to build, as the impacts on traffic under different land uses vary, and *the DEIR misstates the traffic impacts of some uses such as commercial and retail space to a particularly large degree so allowing the applicant to add even more commercial space than is reflected in this plan is extremely problematic.*

SPECIFIC ISSUES AND DEFICIENCIES IN THE DEIR

Aesthetics of the Building and Embedded Billboard

The project proposes replacing:

- a) a 5 acre site that consists of small 1 and 2 story structures, a lot of open space, and large landscaped setbacks from the corner
with
- b) Three enormous structures of up to 12 stories high, minimal setbacks with virtually no open space on Bundy and Olympic, and a massive billboard on the corner of Olympic and Bundy.

These changes are labelled this change as "not significant" from an aesthetics perspective in the DEIR. This characterization is absolutely incorrect.

These buildings are much taller than any other buildings near the project. Other developed properties on the same block and across the street from this project are a maximum of 4 stories. Taller buildings listed in the DEIR as being comparable in height are blocks away, not next to this project site as is implied in the DEIR.

The project proposal includes a massive billboard directly on the corner of Bundy/Olympic to replace 2 existing billboards on the project site. To make matters worse, the billboard may be digital.

Pages 4.B.1-4 to -5 of the DEIR state that "a project could have a potentially significant impact related to aesthetics if it were to: (c) Substantially degrade the existing visual character or quality of the site and its surroundings" [which includes] "The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements." This project absolutely fits the criteria of having a significant impact on aesthetics, which is unacceptable.

Insufficient traffic study area

The DEIR is inadequate because it failed to study any streets north of Wilshire Blvd.

In its scoping letter, South Brentwood Residents Association (SBRA) emphasized the necessity of studying streets such as Sunset Blvd., Montana Avenue, and San Vicente Blvd. However, these comments were ignored and no streets north of Wilshire were included in the study area.

In addition, the signalized intersection of Federal and Wilshire was not included, even though it is within the study area and a heavily traveled intersection of Brentwood.

Because the study area is too small, the DEIR almost certainly understates the number of intersections that would be significantly impacted by the project.

Because all of the east-west arteries throughout West LA, Brentwood, and south of the I-10 already operate at LOS "D", "E", and "F," any impacts caused by this project on streets such as Olympic, Pico, and Santa Monica Blvd, and the I-10/Bundy on-and off-ramps will cause drivers to change routes in an unsuccessful attempt to find streets that are not completely gridlocked.

In particular, drivers from Santa Monica who are trying to access the I-405 north to get to the Valley cut through Brentwood on streets such as Sunset Blvd., San Vicente, and Montana because the I-10/I-405 transition is so gridlocked. These motorists do not have the option of using any sort of mass transit, including Expo, to get from Santa Monica and West LA to the Valley.

Representatives from SBRA have discussed with the applicant's traffic representative that the failure to study these streets is a severe inadequacy of the DEIR. In these conversations we were told that the only traffic impacts on Wilshire Blvd that were considered in the DEIR analysis were those caused by drivers turning left from the project to get to Wilshire.

Specifically, the traffic consultant for the project stated that they did not take into account any traffic originating west of the project in Santa Monica that would divert onto east-west arteries from Wilshire to Sunset in their analysis. This is a major deficiency in the traffic section of the DEIR.

Other large projects adjacent to this one have included a larger study area in their DEIRs that included intersections in Brentwood on San Vicente and Montana, including the Bergamot Transit Village site and Bundy Village.

Martin Town Expo must be required to provide an appropriate traffic study that covers a regional study area as others have done, and this study area must extend north to Sunset Blvd.

Impact of commercial space is severely underestimated

The number of peak hour trips estimated to be generated by the project by commercial space is grossly understated.

SBRA is particularly concerned about the addition of 200,000 sf of commercial space to this highly congested region. As has already been stated, a primary cause of peak traffic in Brentwood is the very large number of commuters who cut through the area to get to jobs in Santa Monica and West LA.

Although we hope that some commuters are able to take the Expo line, this line does absolutely nothing to reduce the large number of commuters who cut through Brentwood to get to the I-405 N and on to the Valley.

We support the concept of including an appropriate amount of residential space in the project, but object strongly to adding more commercial space in an area that has over 4 million of sf of office space within a few miles from this building in West LA, eastern Santa Monica, and Brentwood. Local infrastructure simply cannot support it.

Before accounting for reductions from the Expo line and other mitigations, the base number used for the number of peak hour trips from the 200,000 sf of commercial space is 275.¹

Today's "Creative" office space consists of open floor plans with cubicles which typically host 10 workers or more per 1,000 square feet (100 feet per person). **With 200,000 sf, of space, 1,600 workers could work there, not 275—the base estimate is understated by over 1,300 workers.**² **In other words, the number of peak hour trips generated by the commercial space is understated by over 80%.** This is before the various credits are taken into account, after which only 158 (!) peak hour trips are included in the traffic analysis.

If only 158 peak hour trips can cause significant impacts on 16 intersections, imagine how many intersections would be impacted if the correct number of 1600 workers were used instead of 275!

The use of the term "creative office space" is used to claim that workers who work in the buildings won't commute during peak hours. This is a complete fallacy not justified by any hard facts. Companies who rent similar "creative" space in the buildings immediately surrounding this project are large corporations such as Comcast, Yahoo!, HBO, and Lionsgate. Employees at these locations work regular work hours. It is simply false to claim that "creative" workers who work in Class A commercial space don't commute during peak hours--- workers at tiny tech start-ups, writers, actors, and other creative who work flexible hours don't work in Class A commercial space.

Adding a large grocery store that generates over 4,600 trips per day is completely unnecessary, and its impact is understated in the DEIR

Large grocery stores are easily some of the highest traffic generators of any potential site use, and the project proposal includes a large 45,000 sf grocery space.

Including a large grocery is completely unnecessary, given that 10 large supermarkets already exist in the immediate area:

- Ralphs at Barrington/Olympic (47,000 sf)- 0.4 miles from project site
- Trader Joes at Barrington/Olympic- 0.4 miles
- Trader Joes at Pico/32nd - 0.7 miles
- Vons/Pavilions and Santa Monica/Barrington- 0.8 miles
- Smart & Final at Bundy/Santa Monica- 1.0 mile
- Ralphs at Cloverfield/Olympic- 1.1 miles
- Smart & Final at Pico/Sepulveda- 1.2 miles
- Ralphs at Bundy/Wilshire- 1.3 miles
- Bristol Farms at Wilshire/31st- 1.3 miles
- Whole Foods at Barrington/National- 1.4 miles

¹ 275 trips are assumed for AM peak and 257 trips for PM peak

² 200,000 sf x 80% leasable / 100 sf per person

This doesn't count the numerous smaller markets and convenience stores also located within a similar distance. In other words, this area is not lacking in large supermarkets, and no more are needed.

The grocery store is projected to have 4,601 trips per day. While many are designated as "pass by" trips, the inability to turn left in or out of the project (covered below) means that these trips are likely to generate a lot more of an impact than is projected in the DEIR.

The DEIR also underestimates the traffic from the grocery because a transit credit reducing the number of trips by nearly 15% is applied. **It is highly unlikely that anyone would do their grocery shopping before they get on the Expo line rather than go to a market close to their final destination.**

As bad as the grocery store would be, nothing would prevent the applicant from building big box retail at the site, which could easily generate even more trips than a grocery store as fewer trips would be pass-bys.

SBRA objects to the development of any large retail at this location, whether grocery or otherwise.

Lack of vehicle access to the project

Because the project's DEIR has severely underestimated the number of trips to and from the project each day, it is also underestimating the traffic backup that will be caused by the inability for people to turn left to get to or to exit the project.

People driving from the I-10 or other points south would need to turn left at Olympic/Bundy, a signal that already is backed up at an intersection with LOS "E" during AM peak and "D" during PM peak. Turning left into the project from Bundy is even more infeasible as the entrance is in the middle of an unsignalized block with only a dual left turn lanes shared by southbound traffic.

Similarly, it is ridiculous to assume that traffic exiting the property can do so without turning left. In public meetings on the project it was proposed that drivers might be required to make right turns only—an absurd proposition when one takes into account that this is a particularly large block, and with gridlocked east-west streets no one who is heading east from the project would go the equivalent of 2 or 3 blocks west to start their eastbound journey.

Most likely, drivers will make a combination of legal and illegal left turns and U-turns to attempt to enter and exit the project. Having a large number of cars waiting to turn left backs up streets even beyond what is estimated in the DEIR, and therefore the impact of this project is understated in the DEIR.

Lack of bicycle accessibility

While the project proposes 696 bicycle parking spaces, the project's configuration prevents any bicyclists from getting through the property. On a 4.76 acre site that is only a few blocks from the Bundy Expo station, cyclists coming from the north or south of the project should have paths or streets that allow them to cycle through the project. However, the footprint of the buildings and lack of open space prevents any sort of access through the site.

Cyclists cannot safely bicycle on Bundy Drive, which was determined to be too narrow for dedicated bike lanes by the City, nor can they safely bike on Olympic Blvd. Cyclists can bike on neighborhood streets such as La Grange, Missouri, or Nebraska to get close to the project, but then cannot get through the project to the Expo station.

Certainly given the City's desire to see more people bicycle to mass transit stations like Bundy/Olympic Expo, the City should require anyone who develops a large parcel such as this one to provide bicycle access such as bike paths through the property.

Lack of pedestrian accessibility

The DEIR fails to take into account that having large numbers of pedestrians from the project (residents, workers, and retail customers) attempt to cross Olympic at Bundy to get to the Expo station will tie up traffic and reduce the number of cars that can get through the intersection.

Olympic is a very wide street and even the relatively few pedestrians who cross today cannot all get across the street while the light is green. Adding potentially dozens more pedestrians to every light cycle from the project and from Expo will mean that stragglers will not make it across the street in time, blocking cars trying to turn or go straight.

SBRA has previously proposed to the developer that they integrate a pedestrian bridge or tunnel into their site that would enable people to cross Olympic without blocking traffic.

The City should definitely require any applicants who wish to develop property at such a key intersection near a transit site to cooperate and develop ways for both project users and other passersby to access the station. This is critical if the City wants to encourage pedestrian activity.

Also, as is the case with bikes, adding walkways through the property will encourage pedestrians to walk from the Expo station to the north of the property. Currently the sidewalks along Bundy are narrow, and this project does nothing to improve the walkability of the streets near the Expo station.

In summary, the DEIR for this project is deficient and needs to be redone once the project is reduced to a manageable size for the region. Even the existing DEIR with 16 significantly impacted intersections (18 in 2030) is completely unacceptable. The South Brentwood Residents Association requests that the City of Los Angeles' Planning Department reject this project as presented.

Sincerely,

Lauren Cole, SBRA Transportation Chair

Marylin Krell, SBRA President

Cc: Tricia Keane, Director of Land Use & Planning CD-11
Chris Robertson, *Deputy Director of Land Use & Planning*
Larry Watts, Chair, BCC
Jay Handal Chair: West Los Angeles Neighborhood Council