

Appendix D:  
Traffic Technical Memo



## MEMORANDUM

Date: February 28, 2019  
To: Stacie Henderson, CAJA Environmental Services  
From: Tom Gaul, Fehr & Peers

**Subject: *Responses to Comments from Tom Brohard and Associates on the Draft Environmental Impact Report for the Southern California Flower Market Project***

Ref: LA16-2844

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This memorandum provides responses to the comments submitted by Tom Brohard and Associates dated November 5, 2018, attached to the letter from Elizabeth Watson of Greenberg Glusker also dated November 5, 2018, commenting on the Draft Environmental Impact Report for the Southern California Flower Market Project.

### **Comment No. B11-43**

***The following comments were provided by Tom Brohard and Associates, and are attached to Comment Letter B11.***

Tom Brohard, P.E., has reviewed the September 2018 Draft Environmental Impact Report (Draft EIR) and the February 2018 Draft Transportation Impact Analysis (TIA) for the Southern California Flower Market at 709-765 S. Wall Street, 306-326 E. 7th Street, and 750-752 S. Maple Avenue in the Central City Community Plan Area of the City of Los Angeles. The Proposed Project is planned to be a new mixed-use development consisting of a 15-story tower including 12-story residential tower over three stories of office, retail, restaurant, wholesale flower market, and parking.

With my understanding of American Florists Exchange LTD's operations, I became aware of a number of impacts that project construction as well as occupancy and operation of the Southern California Flower Market Proposed Project will have on the adjacent businesses. The Draft EIR and TIA documents do not fully and completely develop measures that would eliminate these potential impacts of the project on the adjacent businesses and roadway system. This letter points out those deficiencies and recommends that various measures be developed and adopted to address, reduce and manage those impacts. This letter includes various items to address traffic and parking during construction as well as a significant parking shortage following occupancy of the Proposed Project.

### **Response to Comment No. B11-43**

This is an introductory paragraph regarding a series of comments that follow in the letter. The commenter is referred to Responses to Comment Nos. B11-44 through B11-64, below, and also the traffic technical memo, which is attached as Appendix D to this Final EIR.



### **Comment No. B11-44**

#### Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained nearly 50 years of professional engineering experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and now serve as the City Traffic Engineer for the City of Indio and as Consulting Transportation Engineer for the City of San Fernando. I have extensive experience in traffic engineering and transportation planning. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects as shown in a short summary of my experience in the enclosed resume.

### **Response to Comment No. B11-44**

The comment provides information about the commenter's background, but does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

### **Comment No. B11-45**

#### Traffic and Parking Issues

Based on the information regarding the Southern California Flower Market Project documents as well as my understanding of American Florists Exchange LTD's operations, each of the following traffic and parking issues during and after construction must be fully addressed and evaluated:

1) Issues During Construction - Page 40 of the Transportation Impact Analysis (TIA) states "Construction of the Project is anticipated to begin in the last quarter of 2019 and expected to be completed in 2022. The construction is anticipated to involve five key phases: (1) demolition - 4 months, (2) site preparation - 1 month, (3) grading - 3 months, (4) construction - 2 years, and (5) paving." In total, this schedule includes 2 years and 8 months plus an unspecified time for paving. Insufficient information is provided concerning the staging and circulation of haul trucks.

### **Response to Comment No. B11-45**

The comment claims that insufficient information has been provided in the Draft EIR regarding haul trucks. In fact, the anticipated haul routes are described on page 2-6 and again on page 4.L-16 of the Draft EIR. Haul trucks will be staged at an off-site location and radioed in to minimize queuing along streets in the immediate vicinity of the Project Site. Specific off-site truck staging areas are not currently known and are typically determined based on availability at the time construction begins; a provision will be added to Project Design Feature (PDF) L-1/Construction Traffic Management Plan regarding off-site staging (see the Response to Comment No. B11-48).

Potential traffic and parking impacts related to project construction were evaluated in the Draft EIR using the construction impact factors set forth in the *LA CEQA Thresholds Guide* (City of Los Angeles, 2006). The City's Thresholds Guide includes review of four categories of potential impacts: temporary traffic impacts,



temporary loss of access, temporary loss of bus stops or rerouting of bus lines, and temporary loss of on-street parking. The Draft EIR found that Project construction impacts would be less than significant in each of these categories.

Further, the Draft EIR includes development of a detailed Construction Traffic Management Plan as a Project Design Feature L-1. The PDF is described on page 4.L-15 of the Draft EIR and is restated here for reference:

**Construction Traffic Management Plan.** A detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans would be prepared and submitted to the City for review and approval. The Construction Traffic Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Traffic Management Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and will include the following elements as appropriate:

- Providing for temporary traffic control during all construction activities within public rights-of-way to improve traffic flow on public roadways (e.g., flagmen);
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Rerouting construction trucks to reduce travel on congested streets to the extent feasible;
- Prohibiting construction-related vehicles from parking on surrounding public streets;
- Providing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Accommodating all equipment on-site; and
- Obtaining the required permits for truck haul routes from the City prior to issuance of any permit for the Project.

**Comment No. B11-46**

a) Haul Trucks - "Hauling activity is expected to occur during all phases of the Project. Up to 140 haul trucks per day are anticipated during peak haul days. Hauling hours are anticipated to be 7:00 AM to 4:00 PM."

**Response to Comment No. B11-46**

The comment restates a statement from the Draft EIR, but does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.



**Comment No. B11-47**

i) At the peak level of hauling activity, an average of slightly more than 15 trucks per hour would occur, or just over one haul truck every 4 minutes over 9 hours per day. This level of activity is intense and will easily lead to queuing and increased levels of congestion at adjacent intersections. Given the existing traffic circulation patterns, more information is needed as to the actual flow rates and the means to assure that construction traffic will not impact circulation.

**Response to Comment No. B11-47**

As indicated in the Draft EIR and noted in the comment, the anticipated flow rate during the peak days of hauling is 15 trucks per hour. The anticipated haul routes are described on page 2-6 and page 4.L-16 of the Draft EIR and measures described in PDF L-1/Construction Traffic Management Plan would be implemented to address potential impacts. Haul trucks will be staged at an off-site location and radioed in to minimize queuing along streets in the immediate vicinity of the Project Site. Specific off-site truck staging areas are not currently known and are typically determined based on availability at the time construction begins; a provision will be added to PDF L-1/Construction Traffic Management Plan regarding off-site staging (see the Response to Comment No. B11-48).

**Comment No. B11-48**

ii) Stacking of waiting trucks at the site must be accommodated at nearby off-street staging areas but there is no plan to do this.

**Response to Comment No. B11-48**

Specific off-site truck staging areas are typically determined based on availability at the time construction begins. The following provision will be added to PDF L-1/Construction Traffic Management Plan (see Section 3, Revisions, Clarifications, and Corrections, of this Final EIR):

- Providing off-site truck staging in a legal area furnished by the construction truck contractor. Haul trucks would be radioed in from the off-site staging area to minimize queuing along streets in the immediate vicinity of the Project Site.

**Comment No. B11-49**

iii) Loading and unloading of haul trucks must occur within the site and not on the adjacent streets. Wall Street and Maple Avenue are local streets less than 40 feet wide. These roads are too narrow to safely accommodate haul trucks such as 18-wheel double bottom dirt haulers while retaining heavily used on-street parking and loading on both sides at all times.

**Response to Comment No. B11-49**

It is expected that most loading of haul trucks will occur onsite. There may be occasional need to load haul trucks from streets adjacent to the site perimeter. When necessary, this is expected to occur on Maple Street due to the greater width of Maple Avenue relative to Wall Street.



**Comment No. B11-50**

iv) Access to and from the site must only be permitted to and from arterial roadways such as 7th Street on the North and 8th Street on the South, not from Wall Street and Maple Avenue.

**Response to Comment No. B11-50**

The parcels between the Project Site and 8<sup>th</sup> Street are not controlled by the Project Applicant and, as such, access to the site cannot be obtained from 8<sup>th</sup> Street. 7<sup>th</sup> Street is designated as an Avenue II arterial street in the City of Los Angeles *Mobility Plan 2035* and City policies discourage access from arterial streets when access is available from side streets. Construction access to the site is expected to be from both Wall Street and Maple Avenue. Off-loading and hoisting of equipment is expected to occur along the Project's Maple Avenue frontage due to the greater width of Maple Avenue relative to Wall Street.

**Comment No. B11-51**

v) Times of hauling activities must be restricted to hours that do not conflict with deliveries to the adjacent flower markets (M, W, F - 12 midnight to 2 PM; T, Th, Sat 5 AM to 2 PM; S 6 AM to 3 PM).

**Response to Comment No. B11-51**

As discussed on pp. 4.L-15 of the Draft EIR, hauling hours are anticipated to be 7:00 AM to 4:00 PM. Restricting hauling to avoid the hours suggested in the comment would effectively limit hauling to two days per week, which is unreasonable and would render construction of the project infeasible. Further, the analysis provided in Section 4.L of the Draft EIR determined that the Project's construction traffic impacts would be less than significant.

**Comment No. B11-52**

b) Equipment and Delivery Trucks - Vendor equipment and delivery truck trips during construction must also be scheduled to eliminate conflicts with the other existing businesses adjacent to the Proposed Project. Page 41 of the TIA indicates up to 12 vendor truck trips per day will occur on peak activity days. Each of the trips associated with these activities must occur during hours that do not conflict with the operation of the adjacent flower markets.

**Response to Comment No. B11-52**

Restricting equipment and delivery trucks to avoid the hours suggested in the comment would effectively limit these deliveries to two days per week, which is unreasonable and would render construction of the Project infeasible. The Construction Management Plan included as Project Design Feature L-1 on page 4.L-15 of the Draft EIR and described in the Response to Comment B11-45 includes the following measure:

"Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;"

**Comment No. B11-53**

c) Construction Employees - The TIA indicates that the demolition, site preparation, and grading is expected to involve a maximum of 10 workers on site on a daily basis. Construction and paving are expected



to have a total of 60 workers on a peak day. Construction employees must be required to arrive before 7:00 AM when members of the public begin patronizing the flower markets and would leave after the flower markets close at 2:00 PM.

**Response to Comment No. B11-53**

The Los Angeles Municipal Code provides that construction activities are limited to the hours from 7:00 AM to 9:00 PM on weekdays and from 8:00 AM to 6:00 PM on Saturdays and holidays. It is common that construction workers arrive at jobsites prior to 7:00 AM so that construction activities can begin as soon as the code permits.

**Comment No. B11-54**

d) Construction Worker Parking - Each construction worker will likely drive alone. Accommodations for at least 60 parked vehicles must be provided at 601 East 8th Street.

**Response to Comment No. B11-54**

As discussed on page 4.L-17 of the Draft EIR, all construction parking is anticipated to be contained on site during the remodel of the northern building and it is anticipated that construction employees would be parked at 601 East 8th Street during the construction of the new southern building. Furthermore, the Construction Management Plan included as Project Design Feature L-1 on page 4.L-15 of the Draft EIR and described in the Response to Comment B11-45 includes the following measure:

“Prohibiting construction-related vehicles from parking on surrounding public streets;”

If, for any reason, sufficient parking is not available at 601 East 8<sup>th</sup> Street to park the construction workers, accommodations would need to be found at other off-site parking locations.

**Comment No. B11-55**

e) Temporary Traffic Impacts - Pages 41 and 42 of the TIA indicate that closures to sidewalks around the project perimeter adjacent to the construction will be up to three months. Sidewalks across the streets from the project must remain open at all times. The TIA states pedestrian and vehicular access to properties located near the Project site will be open and unobstructed during construction. Each of these statements must be memorialized and enforced.

**Response to Comment No. B11-55**

Sidewalk closures would be limited to sidewalks around the Project perimeter. Sidewalks across the street from the Project Site would remain open.

As discussed on page 4.L-20 of the Draft EIR, it is anticipated that pedestrian and vehicular access to properties located near the Project Site would be open and unobstructed during the construction period. Nevertheless, the following provision will be added to PDF L-1/Construction Traffic Management Plan (see Section 3, Revisions, Clarifications, and Corrections, of this Final EIR):

- Ensuring that access will remain unobstructed for land uses in proximity to the Project Site during Project construction.



**Comment No. B11-56**

f) Temporary Loss of On-Street Parking - Page 42 of the TIA states "On-street parking along Maple Avenue and Wall Street will be restricted throughout construction." On-street parking on the opposite sides of Maple Avenue and Wall Street from the project construction must not be eliminated during construction of the Proposed Project. In addition, the elimination of on-street loading zones along Maple Avenue and Wall Street is also proposed. This on-street parking and loading is heavily utilized by customers during the hours when the surrounding flower markets are open. Prohibiting on-street parking and loading across the street would have a significant impact that must be eliminated.

**Response to Comment No. B11-56**

It is anticipated that temporary on-street parking and loading zone removal during construction would be limited to the street frontages directly around the Project perimeter, not across the street, and that approximately 10-15 spots would be removed during construction.

Also, while parking removal across the street is not anticipated, it should be noted that, per the provisions of California Public Resources Code Section 21099, parking impacts of a residential, mixed-use residential, or employment center Project on an infill site within a transit priority area are not to be considered significant impacts on the environment.

**Comment No. B11-57**

g) Temporary Lane Closures - Page 44 of the TIA states "Delivery vehicles may need to park temporarily on adjacent roadways such as Maple Avenue and Wall Street as they deliver their items. Based on past experience, it is not uncommon for these types of deliveries to result in temporary lane closures." Given the reliance of the flower district businesses on these streets, all construction and delivery vehicles must be required to park on-site or to otherwise operate so as to avoid street closures during business hours. Delivery vehicles must be prohibited from parking across the street on Wall Street and on any other street in the immediate area.

**Response to Comment No. B11-57**

As discussed in the Response to Comment No. B11-50, off-loading and hoisting of equipment is expected to occur along the Project's Maple Avenue frontage due to the greater width of Maple Avenue relative to Wall Street.

**Comment No. B11-58**

h) Mitigation Measures - As stated on Page 46 of the TIA, all mitigation measures during construction must be taken to ensure that access will remain unobstructed for land uses in proximity to the Project site. To implement this, conditions on the adjacent streets during construction, particularly on Wall Street, must be reviewed periodically at various times during construction to make sure that each of the measures are being followed, are effective in ensuring unobstructed access and are fully enforced. If violations are identified and these issues are not immediately rectified, then fines and other penalties must be imposed.





**Response to Comment No. B11-58**

Please see the Response to Comment No. B11-55 regarding adding a provision to PDF L-1/Construction Traffic Management Plan ensuring that access will remain unobstructed for land uses in proximity to the Project Site during Project construction.

Monitoring and enforcement of PDF L-1/Construction Traffic Management Plan is discussed in the Mitigation Monitoring Program contained as Section 4 of this Final EIR.

**Comment No. B11-59**

2) Proposed Project Does NOT Appear To Provide Sufficient Parking - Appendix K-4 to the TIA consists of the "August 7, 2017 Parking Demand Analysis for the Southern California Flower Market". The purpose of this analysis was to determine the existing parking demands generated by the existing flower market operations and to estimate the parking need for the Proposed Project considering the actual Flower Market parking demands.

**Response to Comment No. B11-59**

This comment prefaces the subsequent comments regarding the parking demand analysis presented in the Draft EIR. Please see the Response to Comment No. B11-61 regarding the provision of sufficient parking.

**Comment No. B11-60**

Parking occupancy surveys were conducted once an hour from 10:00 PM to 6:00 PM on November 15 and 16 (Tuesday and Wednesday) and November 17 and 18 (Thursday and Friday) in 2016. Different users were identified by the type of parking permit that the vehicles displayed. Others without permits were assumed to be daily parkers. Additional parking data was also collected on December 21, 2016.

The peak parking demand for only the flower market users was found to be 275 spaces at 7:00 AM and 274 spaces at 9:00 AM. The code-based parking requirement for the new uses to be provided in the Proposed Project was calculated to be 415 vehicle spaces. In total, maintaining the existing flower market demand and adding the proposed residential tower and other new uses yields a total parking demand of 690 parking spaces.

Shared parking techniques were then applied to the Proposed Project and the total parking demand was reduced to 673 spaces. This is 17 spaces less than the calculated need of 690 spaces. The parking demand generated by the existing Flower Market exceeds the City's code requirements of one space per 1,000 square feet. While the Proposed Project as analyzed in the Parking Demand Analysis includes parking for only 479 vehicles as theoretically required by the City Code, that amount of parking is clearly insufficient to accommodate parking for the proposed new uses plus the parking demand created by the existing Flower Market.

**Response to Comment No. B11-60**

The comment restates conclusions regarding parking from the Draft EIR. The commenter is therefore referred to Response to Comment No. B11-61, which discusses the parking proposed for the Project.



**Comment No. B11-61**

The Parking Demand Analysis concludes that "Additional parking supply would be required to meet code requirements for the proposed new uses and accommodate the demand for the continued operation of the Flower Market." However, no definitive plan to provide the additional approximately 200 spaces that are required to meet the parking demand for the Flower Market has been provided.

**Response to Comment No. B11-61**

The purpose of the Parking Demand Analysis (included as Appendix K-4 of the Draft EIR) was to determine how much parking should be provided to accommodate both the continued operation of the Flower Market and the new uses. The comment incorrectly states that there is no definitive plan to provide the additional spaces identified in the Parking Demand Analysis. On the contrary, as discussed on Page 2-3 of the Draft EIR, the Project intends to provide approximately 681 parking spaces, including the 479 code-required spaces and the additional spaces required to meet the parking demand for the Flower Market, consistent with the findings of the Parking Demand Analysis. These 681 parking spaces are a part of the proposed on-site parking supply shown in the project plans presented on Figures 2-1 through 2-11 of the Draft EIR.

**Comment No. B11-62**

Page 2-3 of the Draft EIR states "As such, the Project proposes to provide parking consistent with the parking demand study, or approximately 681 vehicle parking spaces, which would be accommodated in a subterranean level in the new building and above-grade parking in both the new building and the existing north building." This statement is not supported by any evidence in the Draft EIR or in the Parking Demand Analysis to show exactly where or how the additional approximately 200 parking spaces will be provided.

**Response to Comment No. B11-62**

The comment quotes Section 2, Project Description, of the Draft EIR yet states that there is no evidence in the Draft EIR that the Project will provide parking consistent with the parking demand study. It is not clear what evidence the commenter is seeking. The spaces needed for consistency with the findings of the parking demand study are indeed a part of the proposed on-site parking supply shown in the project plans presented on Figures 2-1 through 2-11 of the Draft EIR.

**Comment No. B11-63**

The Project Description for the Proposed Project, including the project plans, must clearly incorporate the additional approximately 200 parking spaces and demonstrate exactly how this will be done. Without this requirement and supporting proof, approximately 200 additional vehicles will overload the existing streets as motorists circle and hunt for any available parking in the area.

**Response to Comment No. B11-63**

The commenter is referred to the Responses to Comment Nos. B11-61 and B11-63.

**Comment No. B11-64**

In summary, the Proposed Project must fully address and reduce the potential impacts of construction on the existing businesses in the immediate area. The calculated parking shortage of nearly 200 spaces must



also be addressed to eliminate potential gridlock on the streets in the area. Further study must be undertaken and more detailed information must be provided in order to properly identify and address the scope of the construction traffic impacts and parking shortage created by the Proposed Southern California Flower Market Project. If you have questions regarding these comments, please contact me at your convenience.

**Response to Comment No. B11-64**

The comment summarizes the comments made in Comment Nos. B11-45 through B11-63. Therefore, the commenter is referred to the Responses to Comment Nos. B11-45 through B11-63, and no further study is required.