



Los Angeles County
Metropolitan Transportation Authority

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Metro

April 13, 2020

Jason McCrea
Department of City Planning
City of Los Angeles
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Sent by Email: Jason.mccrea@lacity.org

RE: Hollywood & Wilcox Project – ENV-2016-3177-EIR
6430-6440 W. Hollywood Blvd.
Draft Environmental Impact Report (DEIR) – Metro Comments

Dear Mr. McCrea:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Hollywood & Wilcox (Project) located at 6430-6440 West Hollywood Boulevard and 1624-1648 North Wilcox Avenue in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro B Line (Red) and Metro bus facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures and project design features as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

In addition to the specific comments outlined below, Metro is providing the City and 6436 Hollywood Blvd., LLC and 1624 Wilcox Ave., LP (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Project Description

The Project includes the development of a 15-story mixed-use building, comprised of 260 multi-family residential units and 17,800 square-feet of commercial uses.

Recommendations for EIR Scope and Content

Bus Service Adjacency

1. Service: Metro Bus Lines 212, 217, 232, and 780 operate on Hollywood Boulevard, adjacent to the Project. One Metro Bus stop(s) is across the street from the Project site at Hollywood and Cahuenga. Other transit operators, such as LADOT, may provide service in the vicinity of the Project and should be consulted.
2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include impacts to transportation services and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:
 - a. Bus Stop Condition: The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.
 - b. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Subway Adjacency

1. Operations: The Metro B Line (Red) currently operates peak service as often as every ten minutes in both directions. Trains may operate 24 hours a day, seven days a week in the tunnels below the Project.
2. Impact Analysis: Due to the Project's proximity to the B Line (Red) tunnels, the EIR must analyze potential effects on subway operations and identify mitigation measures or project design features as appropriate. Critical impacts that should be studied include (without limitation): impacts of Project construction and operation on the structural and systems integrity of subway tunnels; damage to subway infrastructure, disruption to subway service; and noise and vibration. The following provisions should be used to develop a mitigation measure and/or project design feature that addresses these potential impacts:
 - a. Technical Review: The Applicant shall submit for Metro's review all architectural plans, engineering drawings and calculations, and construction work plans and methods,

including any crane placement and radius, to evaluate any impacts to Metro B Line (Red) infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.

- b. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro B Line (Red) or the structural and systems integrity of Metro's tunnels. Not later than one month before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
 - i. Work in close coordination with Metro to ensure that station access, visibility, and structural integrity are not compromised by construction activity or permanent build conditions;
 - ii. Notify Metro of any changes to construction activity that may impact the use of the ROW;
 - iii. Permit Metro staff to monitor construction activities to ascertain any impact to the B Line (Red) ROW.
 - c. Right of Way (ROW) Entry Permit: For temporary or ongoing access to Metro ROW for any construction, and/or maintenance activities, the Applicant shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval not later than two months before the start of Project construction. The Applicant shall apply for and obtain approval for any special operations, including the use of a pile driver or any other equipment that could come in close proximity or encroach on the tunnels or related structures, not later than one month before the start of Project construction.
 - d. Noise & Vibration: The Applicant shall record a Noise Easement Deed in favor of Metro before issuance of any Certificate of Occupancy for the Project. The easement recorded in the Deed shall extend to successors and tenants. The applicant shall provide the original recorded Noise Easement Deed to Metro.
3. Advisories to Applicant: The Applicant is encouraged to contact the Metro Development Review Team early in the design process to address potential impacts. The Applicant should also be advised of the following:
- a. Occupational Safety and Health Administration (OSHA) Requirements: Construction and/or excavation work in proximity to Metro right-of-way (ROW) with potential to damage subway tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.

- c. Cost of Impacts: The Applicant will be responsible for costs incurred by Metro resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Applicant will also bear all costs for any noise mitigation required for the Project.

Transit Supportive Planning: Recommendations and Resources

Considering the Project's proximity to the Hollywood and Vine Station, Metro would like to identify the potential synergies associated with transit-oriented development:

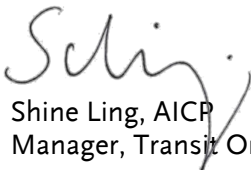
1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/projects/tod-toolkit>.
2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to the Hollywood and Vine Station, including orienting pedestrian pathways towards the station.
3. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:
 - a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops and rail station.
 - b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The Applicant should also coordinate with the Metro Bike Share program for a potential Bike Share station at this development.

- c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at:
http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.
5. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.
6. Transit Pass Programs: Metro would like to inform the Applicant of Metro’s employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs’ website at <https://www.metro.net/riding/eapp/>.

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,


Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>
- Noise Easement Deed