

**DEPARTMENT OF TRANSPORTATION**

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Making Conservation  
a California Way of Life.

November 6, 2019

Ms. Milena Zasadzien  
Department of City Planning  
City of Los Angeles  
221 N. Figueroa Street, Suite 1350  
Los Angeles, CA 90012

RE: 1045 Olive Project  
Vic. LA-110/PM 22.283  
SCH # 2017121047  
Ref. GTS # LA-2018-01277-NOP  
GTS # LA-2018-02843-DEIR

Dear Ms. Zasadzien:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project involves the construction and operation of a 70 story mixed-use high rise development with up to 751,777 square feet of floor area on a 0.96-acre site. The Project would include up to 794 residential units, 12,504 sf of ground-floor commercial uses, a ground-floor public plaza, and residential open space amenities. Five existing single-story commercial building containing 35,651 sf of floor area would be removed from the Project Site.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway

Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

After reviewing the Draft Environmental Impact Report for this project based on Level of Service (LOS), Caltrans has the following comments:

1. From the Transportation Study prepared in August 2018 by The Mobility Group, it was stated that the project would generate net 2,227 daily trips and 196/200 AM/PM peak hour trips per Table 3.1 Trip Generation Estimates. There are 193 related projects in the project vicinity. Many of the project and related trips would be traveling on the State facilities once the projects are built. Cumulative project trips assigning to the State facilities would contribute potential cumulative traffic impacts on the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate potential cumulative traffic impacts.
2. On Table 3.1 1045 Olive-Trip Generation Estimates, please clarify and provide reference on how Apartment ITE 222 daily trip, 1,644 trips, 167/151 AM/PM peak hour trip were calculated per notes #2 (trip rate reductions were applied per LADOT's Transportation Impact Study Guidelines, December 2016) and note #6 (apartments analyzed as ITE 222-Multifamily Housing (High Rise) Used trip rates for Dense Multi-Use Urban). Please provide the page number from the 10<sup>th</sup> Edition of the Trip Generation Manual and formula to arrive the project trip estimates. This would clarify the low volume on the trip estimates for such a large project.
3. As a reminder, the Agreement Between LADOT and Caltrans District 7 on Freeway Impact Analysis Procedure was expired in December 2016. Any meaningful verbal agreement needs to be followed by a signed legal binding agreement acceptable to both agencies. The Lead Agency has the ultimate responsibility to disclose the traffic impact on the State facilities.

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4. Table D-10 Existing With Project-Freeway On-Ramp Analysis-AM Peak Hour and Table D-12 Future With Project-Freeway On Ramp Analysis-AM Peak Hour show 900 trips ramp capacity for the Northbound I-110 on-ramp at 11<sup>th</sup> Street. For both scenarios, the project trips would exceed the available storage length which would create potential traffic conflict (rear end accident) at the entrance of this on-ramp. We recommend the City to make traffic signal adjustment at this intersection or work with Caltrans to modify the on-ramp configuration to make safety improvement.
5. Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.
6. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.
7. As a reminder, in the event that the project proponent finds a significant impact to an intersection including safety traffic issue, an Intersection Control Evaluation (ICE) should be prepared as an initial step of an intersection improvement project.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-LA-2018-02843AL-DEIR.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse