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April 10, 2020

Miya Edmonson
Department of Transportation
District 7 – Office of Transportation Planning
100 S. Main Street, MS 16
Los Angeles, CA 90012

Re: Hollywood Center Project

Dear Ms. Edmonson:

The Department of City Planning is in receipt of your letter dated March 5, 2020, responding to our February 25, 2020 letter inviting you to update your comments relative to the Hollywood Center Project EIR based on adopted VMT (Vehicle Miles Traveled) criterion.

Specifically, Caltrans refers to its April 22, 2019 letter recommending analyses and assumptions that include, but are not limited to, direct and cumulative trips to state facilities, queue lengths, truck load factors, off-ramp queuing and weaving analyses at various intersections, trip assignments, and mentions a fair-share contribution program. Though safety considerations were not mentioned in this April 22, 2019 letter, Caltrans is now asserting that potential impacts to state facilities are “safety traffic concerns.”

The comments received from Caltrans broadly describe traffic and safety concerns related to vehicle storage on freeway ramps and the possibility of creating speed differentials near freeway off-ramps. The comments ask that the City perform queuing analysis based on Highway Capacity Manual (HCM) queuing methodology and explore mitigations such as adding storage length at freeway off-ramps, and signal timing adjustment to reduce delay for vehicles transitioning from freeway off-ramps to city streets.

These requests to analyze direct and cumulative trips to state facilities in the project vicinity, to calculate queue lengths, to consider impacts to auxiliary lanes where traffic generated by the project exceeds the lesser or one-half length of the auxiliary lane or 1,000 feet, to assume a truck load factor of 25 feet per passenger car, and to undertake a select zone analysis to locations assigned 50 or more trips are all inconsistent with SB 743, adopted into law by the legislature and the Governor, directing the Office of Planning and Research (OPR) to replace delay and capacity-based metric such as Levels of Service (LOS) when lead agencies evaluate transportation impacts.

In response to the adoption of SB 743, Caltrans' 2016 Local Development – Intergovernmental Review Program Interim Guidance (LD-IGR) provides specific guidance that all Caltrans comments on development projects “should take into consideration whether the project exhibits low or high VMT (by place type e.g., urban, suburban, and rural areas) and should focus recommendations on smart land use, multimodal access, safety for all users, and reducing single

occupant vehicle trips.” The LD-IGR further asserts that Senate Bill 743 mandated that CEQA review eliminate consideration of delay- and capacity-based analyses, including LOS or similar measures of vehicular capacity or traffic congestion, such as your requests to determine queue lengths, number of trips, and direct and cumulative impacts mentioned in your April 22, 2019 letter.

The 2016 LD-IGR suggests the “top six” elements that Caltrans should emphasize when reviewing development plans, including: (1) discuss Vehicle Miles Traveled associated with the land uses of the project; (2) provide recommendations that strive to reduce VMT generation, such as improvements to pedestrian, bike and transit service; (3) focus on travel efficiency that addresses transportation impacts rather than traffic impacts and which considers multi-modal transportation; (4) promote a collaborative effort that convey Caltrans’ desire to assist the City of Los Angeles (as Lead Agency) in determining whether a project is location-efficient with safe and adequate access to multi-modal transportation system, whether the project is consistent or inconsistent with growth patterns or infrastructure features in Regional Transportation Plans (RTPs) or Sustainable Community Strategies or with State planning priorities of infill, conservation and efficient development; (5) create paths for workable solutions and overcome roadblocks by offering solutions that address how multi-modal policies at the City, County, and State level can be considered in Project review; and, (6) focus comments on VMT impacts and not on delay or effects on road capacity, such as reducing demand on SHS, and improvements on conventional roadways should emphasize a complete streets approach (reductions to lane widths, landscaped medians, sidewalk bulb outs, etc.). In this regard, the LD-IGR states that suggestions focused on capacity improvements to freeway ramps and mainlines should be “a last resort”, with an emphasis on more effective methods that highlight a complete streets approach, including “crosswalk signal timing, intelligent transportation systems improvements, enhanced signage, roadway designs that result in reduced speed limits, and other effective methods that do not significantly increase VMT.”

To the extent that Caltrans is seeking an analysis that specifically addresses safety concerns, it would be helpful to the City of Los Angeles if Caltrans could share their adopted methodology that would assist the City in determining whether impacts to safety would occur. For example, what protocol has Caltrans adopted to measure safety impacts for improvements to its own facilities? What proposed improvements have been identified as necessary to improve safe conditions for all transportation users in relation to its facilities? What thresholds have been adopted by Caltrans that would help Lead Agencies across the state identify impacts consistently? What physical improvements have been identified as having positive outcomes to increase safety and decrease conflicts to users of our shared transportation network?

Consistent with the State’s mandate, and the guidance of the 2016 LD-IGR, to focus on multi-modal solutions and prioritize analyses and improvement enhancements that minimize conflicts across all transportation systems, the City of Los Angeles’ Vision Zero initiative is a data-driven effort that identifies the network of streets (High Injury Network) that include a high number of collisions that result in fatalities or serious injuries. The Vision Zero Action Plan identifies specific safety improvements to these facilities aimed at “protecting our most vulnerable road users, including children, older adults, and people walking and bicycling.” Through the City’s efforts to implement safety enhancements and complete street treatments to the City’s street infrastructure, including the installation of signalized pedestrian crossings, bike lanes, Leading Pedestrian Intervals, pedestrian crosswalk scrambles, high-visibility crosswalks, and curb extensions (i.e., bulb outs), the City of Los Angeles has been able to effectively demonstrate that such investments result in a significant decrease in collisions and injuries. More information on the Los Angeles’ Vision Zero initiative can be found at: <http://vision-zero.ua5.land/>.

The City of Los Angeles appreciates our shared commitment to safety to all transportation users, and primarily to our most vulnerable users. We look forward to receiving the requested information from Caltrans.

Sincerely,



Luciralia Ibarra
Principal City Planner
Major Projects
Department of City Planning

