

From: Mindy Nguyen <Mindy.Nguyen@lacity.org>
Sent time: 04/10/2020 12:26:54 PM
To: alan.lin@dot.ca.gov; Edmonson, Miya R@DOT <miya.edmonson@dot.ca.gov>
Cc: Luciralia Ibarra <luciralia.ibarra@lacity.org>; Milena Zasadzien <milena.zasadzien@lacity.org>
Subject: Re: SCH # 2018051002 Hollywood Center Project-Caltrans Additional Comment
Attachments: DCP to Caltrans 4_10_20.pdf LA-2018-03177-CalTrans.pdf

Mr. Lin,

Attached, please find the City of Los Angeles Department of City Planning's response to Caltrans' correspondence regarding the Hollywood Center Project, dated March 5, 2020.

A hard copy has been sent in the mail to your attention.

Thank you.

On Thu, Mar 5, 2020 at 2:47 PM Debbie Lawrence <debbie.lawrence@lacity.org> wrote:

----- Forwarded message -----

From: Lin, Alan S@DOT <alan.lin@dot.ca.gov>
Date: Thu, Mar 5, 2020 at 10:27 AM
Subject: SCH # 2018051002 Hollywood Center Project-Caltrans Additional Comment
To: Debbie Lawrence <debbie.lawrence@lacity.org>
Cc: Edmonson, Miya R@DOT <miya.edmonson@dot.ca.gov>

Dear Ms. Lawrence,

Attached please find Caltrans comment to your request.

Thank you!

Alan Lin, P.E.

Project Coordinator

State of California

Department of Transportation

District 7, Office of Transportation Planning

Mail Station 16

100 South Main Street

Los Angeles, CA 90012

(213) 897-8391 Office

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City Planner

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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

DEPARTMENT OF TRANSPORTATION

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a California Way of Life.*

March 5, 2020

Ms. Debbie Lawrence, AICP
Major Projects Section
Department of City Planning
City of Los Angeles
221 N Figueroa St. Suite 1350
Los Angeles, CA 90012

RE: Hollywood Center Project
SCH# 2018051002
GTS # LA-2018-03177-AL
Vic., LA-101, PM 7.16

Dear Ms. Lawrence:

Thank you for your letter dated February 25, 2020. Your letter provides an opportunity to Caltrans to provide updated comments based on the adopted VMT criterion.

Caltrans' comment letter dated April 22, 2019 was based on the scoping meeting with Los Angeles Department of Transportation, LADOT and traffic consultants. As you indicated that "the letter provides recommendations for the Project's Draft EIR traffic analysis focusing on potential traffic conflicts pertaining to direct and cumulative trips to state facilities in the project vicinity; off-ramp queuing, local truck factor; affected intersections, acceleration and deceleration lanes, and weaving areas in the project vicinity; and potential traffic improvement measures". The contents of the letter are all safety traffic concerns from Caltrans that should be included in the traffic analysis, regardless of whether a VMT- or LOS-Based traffic analysis is used in the environmental document.

Please feel free to contact Mr. Alan Lin at (213) 897-8391 if you have any questions regarding the above. We look forward to working with you and to reviewing and providing comments on the traffic study.

Sincerely,

A handwritten signature in blue ink, appearing to read "Miya Edmonson".

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Attachments

Attachment #1

DEPARTMENT OF
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February 25, 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 received your comment letter dated April 22, 2019 in response to the Hollywood Center Project (Project) Notice of Preparation of an Environmental Impact Report (EIR) and Public Scoping Meeting. To summarize, the letter provides recommendations for the Project's Draft EIR traffic analysis focusing on potential traffic conflicts pertaining to direct and cumulative trips to state facilities in the project vicinity; off-ramp queuing, local truck factor; affected intersections, acceleration and deceleration lanes, and weaving areas in the project vicinity; and potential traffic improvement measures.

On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and recent changes to Section 15064.3 of the CEQA Guidelines. Over the last five years, the City of Los Angeles Departments of City Planning and Transportation led efforts to facilitate the City's transition to VMT, to prepare new Transportation Assessment Guidelines (TAG) that address these changes, and to revise the Transportation Section to the City's CEQA Threshold Guide. The intent of SB 743 and subsequent changes to CEQA is to appropriately balance the needs of congestion management with statewide goals related to: the reduction of greenhouse gas emissions, infill development, and the promotion of public health through active transportation.

In light of the fact that your letter, dated April 22, 2019, predated the recent changes in criteria used to determine transportation impacts, the Department of City Planning would like to provide you with an opportunity to provide updated comments based on the adopted VMT criterion. Please respond to this letter within 10 days of the date of this letter, or by March 6, 2020.

Sincerely,

Debbie Lawrence, AICP
Senior City Planner
Major Projects
Department of City Planning



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DEPARTMENT OF TRANSPORTATION

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April 22, 2019

Ms. Mindy Nguyen
Major Projects Section
Department of City Planning
City of Los Angeles
221 N Figueroa St. Suite 1350
Los Angeles, CA 90012

RE: Hollywood Center Project
SCH# 2018051002
GTS # LA-2018-01879-NOP2-AL
Vic., LA-101, PM 7.16

Dear Ms. Nguyen:

Per our discussion during the scoping meeting held on December 19, 2018 and February 26, 2019, the California Department of Transportation ("Caltrans") submits the following recommendations for the traffic analysis focusing on potential traffic conflicts:

1. Caltrans requests information regarding the assignment of direct and cumulative trips to state facilities in the project vicinity.
2. The project proponent may use a 95 percentile to obtain queue length.
3. To calculate the baseline condition for total queue length on off-ramps, measure the distance from the intersection to the gore point. Caltrans recommends that any queuing on an off-ramp attributable to the project beyond 85% of this total length be considered a significant impact for direct or cumulative impacts.
4. When an auxiliary lane is present, impacts will be considered significant, either directly or cumulatively, when the traffic generated by the project exceeds the lesser or one-half length of the auxiliary lane or 1,000 feet. We have attached a queuing analysis template for your reference.
5. If Synchro software is used to calculate queue length, then actual signal timing must be used.
6. In addition, the analysis should use a local truck factor and 25 feet per passenger car.
7. Potential traffic conflict analysis should include off-ramps, affected intersections (left- and right-turn queue), acceleration and deceleration lanes, and weaving areas in the project vicinity. Caltrans recommends including, at a minimum, the following locations in the off-ramp queuing analysis:
 - a. Cahuenga BI & US 101 NB Off-ramp
 - b. Cahuenga BI & US 101 SB Off-ramp
 - c. Vine St./Franklin Ave. & US 101 SB Off-ramp

Ms. Mindy Nguyen
April 22, 2019
Page 2

- d. Gower St. & US 101 NB Off-Ramp
- e. Gower St. & US 101 SB Off-Ramp
- f. US 101 NB Off-ramp & Hollywood Blvd.
- g. US 101 SB Off-ramp & Hollywood Blvd.

Additionally, Caltrans recommends including the following locations be included in the mainline merge and weaving analysis:

- a. US 101 Odin St. to Cahuenga Blvd.
 - b. US 101 Cahuenga Blvd. to Vine St.
 - c. US 101 Vine St. to Gower St.
 - d. US 101 Gower St. to Hollywood Blvd.
 - e. US 101 Hollywood Blvd. to Sunset Blvd.
8. Select Zone analysis should be performed to identify locations anticipated to be assigned 50 or more project trips on the mainlines such as US-101, SR-134, I-5, SR-170, etc.
 9. In the event that the project proponent finds a significant impact to an intersection, an Intersection Control Evaluation (ICE) should be prepared as an initial step of an intersection-improvement project.
 10. If an impact is identified, Caltrans recommends consideration of the following potential traffic conflict improvement measures:
 - a. Safety sign/Yield Sign, delineation
 - b. Pavement markings
 - c. ADA ramps, pedestrian sidewalk
 - d. Ramp metering
 - e. Intersection control
 - f. Ramp/lane widening. While ramp or lane widening is a potential improvement measure, this measure should be considered as a last resort after first considering measures (a) through (e) above.
 - g. Please note that the above is a non-exclusive list of potential improvement measures. The project proponent should consider additional feasible measures.
 11. The project proponent may pay 100% of the direct impact and/or fair-share contribution (i.e., a fee program) with cumulative impacts.

Please feel free to contact Mr. Alan Lin at (213) 897-8391 if you have any questions regarding the above. Please note that Caltrans reserves the right to provide comments in the future. We look forward to reviewing and providing comments on the traffic study.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse
Attachment

Attachment

TABLE 3
PEAK HOUR OFF-RAMP INTERSECTION 95TH PERCENTILE QUEUES

Ramp	Cross Street	Ramp Length (ft) [a]	85% Ramp Length (ft)	Ramp Turn Lanes at Intersection			Existing (2016)				Cumulative (2035) plus Project				Queue 85% Exceeds Storage?
				Lanes	Move	Length [a]	AM Queue		PM Queue		AM Queue		PM Queue		
							Lane (ft)	Max (ft)	Lane (ft)	Max (ft)	Lane (ft)	Max (ft)	Lane (ft)	Max (ft)	
I-210 Westbound Off-Ramp	Roxford Street	1110	940	2	Left	520	X	X	X	X	X	X	X	X	Yes/No
I-210 Eastbound Off-Ramp	Roxford Street	1050	890	2	Right/Through/Left	1110	X	X	X	X	X	X	X	X	Yes/No
I-210 Westbound Off-Ramp	Polk Street	930	790	2	Right/Through/Left	1050	X	X	X	X	X	X	X	X	Yes/No
I-210 Eastbound Off-Ramp	Polk Street	1180	1000	2	Right/Through/Left	460	X	X	X	X	X	X	X	X	Yes/No
I-5 Northbound Off-Ramp	Roxford Street	1080	920	2	Right/Right/Left	930	X	X	X	X	X	X	X	X	Yes/No
				2	Right/Right/Left	690	X	X	X	X	X	X	X	X	Yes/No
				2	Right/Right/Left	1180	X	X	X	X	X	X	X	X	Yes/No
				2	Right/Right/Left	780	X	X	X	X	X	X	X	X	Yes/No
				2	Right/Right/Left	1080	X	X	X	X	X	X	X	X	Yes/No

[a]: Storage lengths determined based on scaled distances from on-line aerial photographs

Need to add Existing + Project Condition.