

From: David Somers <david.somers@lacity.org>
Sent time: 06/15/2020 12:26:02 PM
To: alyssa.begley@dot.ca.gov
Cc: Rubina Ghazarian <rubina.ghazarian@lacity.org>; Carranza, Tomas <Tomas.Carranza@lacity.org>
Subject: D7 Caltrans Letters
4_2020-0529_LA-2018-03233-DEIR Comments_06012020.pdf 1_1330Pico_Caltrans.pdf 2_CALTRANS-Letter in response to
Attachments: DEIR_Signed.pdf 3_LA-2016-02420 DEIR Modera Argyle.pdf LADOT TAG - Interim Freeway Safety Analysis Guidance (May 2020).pdf

Hi Alyssa,

I wanted to pass on a few more letters we have received from Caltrans D7 on development projects. While two of the letters appear in line with State guidance, we find the two letters presumably assigned to Alan Lin to be of some concern in their over-generalized method for freeway queuing analysis:

- The Albany Project, submitted on March 25th, 2020
- The Modera Argyle Project, submitted on May 30th, 2020

The Modera Argyle comment letter is specifically problematic in that it includes language (see enumerated #2.) alleging an cumulative traffic impact on state facilities without reference to criteria, and appears to directly contradict the intent of SB 743. Also, the Modera Argyle comment letter is silent to our Interim Freeway Guidance Memo published May 1st where we proposed a method to identify freeway queuing that could potentially be associated with a safety concern.

We would certainly appreciate any suggestions you may have on how this discrepancy can be addressed.

Thanks in advance,
David

On Mon, Feb 3, 2020 at 5:36 PM David Somers <david.somers@lacity.org> wrote:

A few additional letters (and responses) attached.

On Wed, Jan 29, 2020 at 5:30 PM Rubina Ghazarian <rubina.ghazarian@lacity.org> wrote:

Hello Alyssa,

I wanted to send one other letter forwarded from our colleagues. Please see attached.

Thank you,

Rubina

On Mon, Jan 27, 2020 at 6:31 PM David Somers <david.somers@lacity.org> wrote:

Hi Alyssa,

From the call today, I am resharing the Caltrans D7 letters we know of, which I think you already have. The most recent is from November 6, 2019. We can reach out to our Major Projects team at DCP to see if they have received any more.

We really appreciate your offer to be the remediary while the new Guidelines are being sorted out.

David

On Wed, Oct 9, 2019 at 9:18 AM David Somers <david.somers@lacity.org> wrote:

Hi Alyssa and Chris,

See another Caltrans Districts 7. This letter is an improvement in that it references the new VMT analysis procedures, though still makes reference to HCM method for studying delay on freeway ramps at key intersections as part of the CEQA document. Further complicating the matter, is that Caltrans seems to just reflect the statement in the NOP that traffic and CMP intersections segments may be significant under CEQA, which was released by the Department of City Planning (DCP). It's still early in our post-adoption, so it makes that we are still updating our letter templates, though in the future, I expect we will not be identifying additional traffic at CMP intersections as a potential impact in NOP letters.

David

On Mon, Sep 30, 2019 at 5:39 PM David Somers <david.somers@lacity.org> wrote:

Hi all, thanks again for your support to review the letters. See attached the most recent. I'll forward others as they come to our attention.

David Somers

Supervising Transportation Planner I
Transportation Planning + Policy

[Los Angeles Department of Transportation](#)

213.972.5966



"I slept and dreamt that life was joy. I awoke and saw that life was service. I acted and behold, service was joy." - [Rabindranath Tagore](#)

"Protect the Earth, explore the universe, and serve people." - [Governor Edmund G. Brown](#)

Notice: I am off every other Friday

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On Mon, Sep 30, 2019 at 3:42 PM Wietgreffe, Wade (CPC) <wade.wietgreffe@sfgov.org> wrote:

Hello Chris and Alyssa,

Please see attached letter, page 2: Highway Operations, comments concerning a road diet project in San Francisco.

Thank you for your offer to review this letter in relation to your conversations at the state level. I appreciate the continued collaboration,

**Wade Wietgreffe, AICP, Principal Planner
Environmental Planning Division**

San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.9050 | www.sfplanning.org

[San Francisco Property Information Map](#)

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Rubina Ghazarian

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Los Angeles Department of Transportation

213.972.8628



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June 1, 2020

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-2018-03233-DEIR-AL
Vic., LA-101, PM 7.16

Dear Ms. Nguyen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The Hollywood Center Project is a mixed-use development on an approximately 4.46-acre site (Project). The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site", and the portion located between Vine Street and Argyle Avenue is identified as the "East Site". The Project Site is currently developed with a single-story building and surface parking on the West Site; the East Site is currently developed with the Capitol Records Building and Gogerty Building, both occupied by Capital Records (the Capitol Records Complex), and surface parking.

As part of the Project, the existing building on the West Site would be demolished, and the Capitol Records Complex would be preserved. The remainder of the Project Site would be redeveloped with 1,005 residential units comprised of 872 market-rate and 133 senior affordable units, and up to 30,176 square feet of commercial uses within four new mixed-use buildings. Overall, the Project would contain up to 1,287,150 square feet of floor area.

The residential and commercial uses would be located within four new buildings: a 35-story building on the West Site (West Building); a 46-story building on the East Site (East Building); and two 11-story senior housing buildings, one on each site (West Senior Building and East Senior Building), set aside for Extremely Low and/or Very Low Income households.

Ms. Mindy Nguyen
June 1, 2020
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Under a proposed East Site Hotel Option, 104 residential units within the East Building would be replaced with a hotel. In total, the Project with the East Site Hotel Option would contain 884 residential units, comprised of 768 market-rate and 116 senior affordable units, a 220-room hotel with supporting amenities, and up to 30,176 square feet of commercial uses. Overall, the Project with the East Site Hotel Option would contain up to 1,272,741 square feet of floor area.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. CEQA Guidelines were adopted in December 2018, which implement SB 743's change to CEQA transportation analysis including use of a Vehicle Miles Traveled metric for land use projects. The CEQA Guidelines amendments are available at <https://resources.ca.gov/About-Us/Legal/CEQA-Supplemental-Documents>

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.

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The Project Site is located in a dense area of Hollywood served by numerous public transit lines. Existing Transit Service shows the various transit lines providing service in the Project vicinity. The Metro Red Line, five local Metro bus routes (Route 180/181, 210, 212/312, 217, and 222), a Metro Rapid bus route (Route 780), and three LADOT DASH lines (Hollywood, Beachwood Canyon, and Hollywood/Wilshire) serve the area.

There are existing and planned designated bicycle facilities in the Project Area. Wilcox Avenue, Vine Street, Selma Avenue, Argyle Avenue, and Franklyn Avenue are designated as roadways intended to share the road with bicyclists and provide shared lane markings; these roads are also known as bicycle routes. Yucca Street is designated as a bicycle-friendly roadway. The Project would provide up to 551 bicycle parking spaces (or 554 bicycle spaces under the Project with the Project with East Site Hotel Option), as well as bike lockers and showers located in the subterranean bike parking areas in dedicated areas on the respective sites. A bicycle repair facility would also be provided on the Project Site as part of the amenities to increase access for bicycle users.

The Project has committed to implement numerous Transportation Demand Management (TDM) measures that are included as part of Project Design Feature TRAF-PDF-1. The TDM Program is aimed at discouraging single-occupancy vehicle trips and would collectively serve to reduce dependence on single-occupancy vehicles. The TDM Program encourages alternative modes of transportation, such as carpooling, taking transit, walking, and biking. As part of the TDM, the Project would support strategies to encourage public transit, such as providing unbundled parking, on-site locations to purchase Metro passes, transit subsidies, a commute trip reduction program; shared mobility features (i.e., bike and car share); bicycle friendly infrastructure, education and encouragement program on available transit option; and on-site management of TDM programs. These TDM measures would collectively serve to reduce VMT per capita. Caltrans requests that the Lead Agency incorporate these TDM measures into the Project and confirm that the implementation of these measures will be enforceable over time.

The Project provides a sustainable transportation system that promotes environmental and public health. The Project's mix of uses would allow residents, employees, and visitors to make transportation choices that are more environmentally sustainable and promote public health by providing convenient access to walking, biking, and transit options in and around the Project Site. A pedestrian paseo and a proposed signalized crossing across Argyle Avenue are intended to facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. These improvements would improve first/last mile access to nearby transit, including the Metro Red Line.

Ms. Mindy Nguyen
June 1, 2020
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The Project would encourage the use of electric vehicles by providing parking spaces capable of supporting electric vehicle supply equipment as required in Project Design Feature GHG-PDF-1 for minimum of 30 percent of the provided parking spaces, with 10 percent of the provided spaces further improved with electric vehicle charging station. As such, the Project would support the use of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

As a result of the project design, the Project would generate 4.8 household VMT per capita for Project Household and Work VMT. The Project with the East Site Hotel Option would generate 4.7 household VMT per capita. Both options are below the threshold of significance of the Central APC of 6.0 household VMT per capita. Therefore, the Project would result in less than significant VMT impacts. Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or program in Mobility Plan 2035 adopted to protect the environmental and reduce VMT.

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. 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.

Finally, the City provided a supplemental traffic analysis as Appendix N to respond to Caltrans' safety concerns to the transportation system. In reviewing this appendix, we are not satisfied that our concerns have been addressed. As such, we would like to meet with the City to discuss the details of our concerns and work toward a mutually agreeable resolution. Any improvements or modifications to the State Highway system that result from our discussion should be included as conditions of approval of the Project by the City.

Please feel free to contact Miya Edmonson at (213) 897-6536 if you have any questions regarding the above. We look forward to working with you.

Sincerely,



PAUL ALBERT MARQUEZ
Deputy District Director, Planning, Goods Movement and Local Assistance

cc: Scott Morgan, State Clearinghouse

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March 25, 2020

Mr. Johnny Le
City of Los Angeles
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: The Albany
Vic. LA-110/ PM 21.779, LA-10 14.546
SCH # 2020029096
GTS # LA-2020-03174AL-NOP

Dear Mr. Le:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The development would include a 730-guest room hotel (37-story), 63,356 square feet of conference space, 5,405 square feet of office space, 19,665 square feet of restaurant and bar use, 443 parking spaces, and 9,325 square feet of spa/fitness space.

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) has been codified into CEQA law and 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. 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, this 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.

As a reminder, Vehicle Miles Traveled (VMT) will be the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. Agencies may opt-in prior to that date.

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.

Overall, the EIR should include Transportation Impact Study (TIS) to ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We 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.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

One of Caltrans' safety concerns is the potential traffic conflict on the State facilities. Currently, the state facilities are operating at or near capacity during the peak hours. Any additional trips may cause potential rear-end accident. When this large project is at built-out condition, many project traffic and cumulative trips would assign to the state facilities, traffic analysis should include queuing analysis to address safety issues to comply with CEQA. The following should be included in the traffic analysis.

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 for a queuing analysis. 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 beyond 85% of this total length be considered a significant impact for direct or cumulative impacts. If Synchro software is used to calculate queue length, then actual signal timing must be used for existing condition. Caltrans recommends the following locations in the off-ramp queuing analysis:

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Mr. Johnny Le, Planner

March 25, 2020

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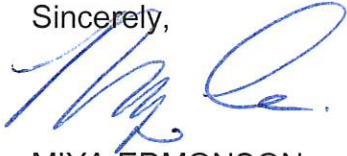
- a. I-110 NB off-ramp to W. Pico Blvd.,
 - b. I-110 NB on-ramp from 11th St. (EB 11th St. left-turn lane queue to on-ramp)
 - c. I-110 SB off-ramp to Blaine St./W. Olympic Blvd.,
 - d. I-110 SB on-ramp from 11th St./Blaine St. (intersection queue on SB Blaine St. that may affect I-110 SB to Blaine St./W. Olympic Blvd.,
 - e. I-10 WB off-ramp to W. Pico Blvd.,
 - f. I-10 EB off-ramp to Hoover St. (if any trip).
3. 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.
4. 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, signal optimization
 - 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.
5. The project proponent may pay 100% of the direct impact and/or fair-share contribution (i.e., a fee program) with cumulative impacts.

Due to the large size of this project and the location to the State facilities, we would request a scoping meeting between Caltrans, the City staff including LADOT, developer, and traffic consultant before a traffic study is prepared. A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts should be presented in the traffic study. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2020-03174AL-NOP.

1_1330Pico_Caltrans.pdf
Mr. Johnny Le, Planner
March 25, 2020
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Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
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April 7, 2020

Jason McCrea
City of Los Angeles Department of City Planning
221 N. Figueroa Street
Los Angeles, CA 90012

RE: Hollywood & Wilcox – Draft Environmental
Impact Report (DEIR)
SCH # 2017051079
GTS # 07-LA-2017-03173
Vic. LA-101/PM: 7.588

Dear Jason McCrea:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The proposed project is an infill, mixed-use development comprised of 260 multi-family dwelling units and approximately 17,800 square feet (SF) of commercial uses on a 1.4-acre project site within the City of Los Angeles. Up to 10% of the dwelling units would be set aside for workforce housing. Upon completion, the Project would include approximately 278,892 SF of floor area, inclusive of the 9,000-SF existing Attie Building, with a maximum floor area ratio (FAR) of up to 4.5:1. Approximately 420 parking spaces would be provided, which accounts for a 10% reduction, pursuant to the Los Angeles Bicycle Parking Ordinance. The Project is an Environmental Leadership Development Project under Assembly Bill 900, certified by the Governor on October 10, 2019. The City of Los Angeles is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are the United States 101 (US-101) and State Route 2 (SR-2), which is also known as Santa Monica Boulevard. The US-101 at Cahuenga Boulevard is located approximately 2,200 feet away from the project, and the SR-2 at Wilcox Avenue is located approximately 4,000 feet away from the project.

Regarding transit access, the project is located approximately .25 miles away from the Metro Red Line Hollywood/Vine station, and approximately 2,500 feet away from the Metro Red Line Hollywood/Highland Station. This means that the project is located in a Transit Priority Area (TPA) per the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research (OPR), dated December 2018. There are also several bus lines with stops along Hollywood Boulevard near the project site. Specifically, there are eight Metro local lines, 3 DASH lines, and one LADOT Commuter Express line that have stops near the project site.

In terms of active transportation facilities serving the project, there are sidewalks along Hollywood Boulevard and Wilcox Avenue. The project also involves implementing streetscape amenities, such as a row of street trees on Wilcox Avenue, pedestrian-scale lighting, and landscaped outdoor seating areas. As discussed in the DEIR, while there are no dedicated bicycle facilities in the immediate vicinity of the project site, there are a limited number of Class II and Class III bicycle facilities in the study area. Also, the project will offer 304 bicycle parking spaces.

Caltrans initially commented on the Notice of Preparation for this project in June 2017. Since then, the City of Los Angeles has adopted a Vehicle Miles Traveled (VMT) metric for transportation analysis, in accordance with Senate Bill 743 (2013). This bill mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. In light of the City's early adoption of VMT, Caltrans has reviewed this project based on the 2018 OPR Technical Advisory on Evaluating Transportation Impacts in CEQA. According to these guidelines, this project is presumed to have a less than significant impact because it is located in a TPA, and meets the following criteria:

- Has a floor area ratio of more than 0.75
- Does not include more parking than required by the local permitting agency
- Is consistent with the region's Sustainable Communities Strategy
- Does not replace affordable residential units with a smaller number of moderate- or high-income residential units

In addition, Caltrans does not have any safety concerns with this project. However, if any of the following proposed transportation-related Project Design Features will be implemented in or near Caltrans right-of-way, please inform Caltrans for its review and approval.

- **TR-PDF-1:** Preparation of a Construction Traffic Management Plan
- **TR-PDF-2:** Implementation of a Transportation Demand Management Program
- **TR-PDF-3:** Contribution toward Transportation Systems Management Improvements

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as preparing a TDM program, providing pedestrian lighting, and widening a portion of Wilcox Avenue by five feet. Additional TDM strategies that the City of Los Angeles can consider integrating into this project include:

- Provide transit passes to residents and employees to encourage them to utilize nearby transit services.
- In addition to providing parking incentives, all parking should be priced appropriately, and unbundled from residential leasing agreements.
- Provide showers, lockers, and an on-site bike repair room to residents and employees, to support a mobility hub and decrease barriers to cycling.
- Improve bus stops adjacent to the site, such as by providing a bench at the bus stop on the southwest corner of Hollywood Boulevard and Wilcox Avenue.
- Enhance bicycle facilities on Wilcox Avenue and Selma Avenue to create safer and more comfortable environments for people on bikes.
- Ensure that the portion of sidewalk that will be widened on Wilcox Avenue meets ADA requirements after it is widened.

Please make every attempt to reduce VMT.

Jason McCrea
April 7, 2020
Page 3 of 3

As a reminder, any transportation of heavy construction equipment or materials that requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. If construction traffic is expected to cause delays on any State facilities, including the US-101, please submit the Construction Traffic Management Plan detailing these delays for Caltrans' review. Caltrans supports the measure in this plan to require construction-related traffic, including truck haul trips, to be scheduled outside of commuter peak hours to the extent possible.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2017-03173.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

DEPARTMENT OF TRANSPORTATION

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May 30, 2019

Ms. Kathleen King
Major Projects Section
City of Los Angeles
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012

RE: Modera Argyle
Vic. LA-101/PM 6.524-7.22
SCH # 2017081039
GTS # LA-2017-02420-DEIR

Dear Ms. King:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes to develop a new mixed-use project on a 1.1-acre site located within the Hollywood community of the City of Los Angeles. The Project includes 276 residential units, up to 24,000 square feet of neighborhood-serving commercial retail and restaurant uses, and up to 412 vehicle parking spaces. Alternatively, up to 27,000 square-foot grocery store could be constructed in lieu of the proposed retail and restaurant uses.

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.

Ms. Kathleen King
May 30, 2019
Page 2

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.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts is needed. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

After reviewing the Draft Environmental Impact Report (DEIR) and Transportation Impact Study (TIS) date in March 2018 for this project, Caltrans has the following comments:

1. On page 8 of TIS, "Caltrans facilities were evaluated according to the requirements of the Caltrans Agreement which identifies a series of screening criteria that, if any are met by the Project, require a more detailed analysis of Caltrans facilities." On Appendix A of the TIS, Memorandum of Understanding, the memo was signed in June 2017 and the Notice of Preparation is prepared on August 18, 2017. However, the agreement between Caltrans and LADOT expired in December 2016. As a reminder, please do not use the agreement for any future TIS. Instead, Caltrans consultation for future methodology, study locations, and significant threshold is recommended.

2. On page 65 of TIS, Table 8 (Trip Generation) stated that the project would generate a net of 2,013 new project daily trips and 170/179 AM/PM peak hour trips. Table 14 (Trip Generation-Supermarket Option) stated that the project would generate a net of 1,971 new project daily trips and 117/192 AM/PM peak hour trips. This TIS identified 108 related projects in the project vicinity including the Hollywood Center Project (previously named Millennium Hollywood Project). As you know, the existing LOS on US-101 is operating at or near capacity. Many of the project's and trips generated by other nearby projects would be traveling on the State facilities once the projects are built. As such, Caltrans anticipates potential significant 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 significant cumulative traffic impacts.
3. On page 71 of TIS, Table 9 Existing with Project Conditions, "LOS based on field observation...the calculated average operating conditions may appear better than is observed." Caltrans cannot verify this statement as neither the referenced date of the observation nor the field data are provided in the TIS.
4. Please provide the data supporting the existing condition description at Location No. 1 Vine Street & Franklin Avenue/US-101 SB Off-ramp and Location No. 2 Argyle Avenue & Franklin Avenue/US-101 NB on-Ramp. For example, Location No. 1, we are not able at this time to concur with the LOS "A" for both AM/PM peak hour in Table 5, page 33 of TIS.
 - a. The Project is expected to add 85 and 118 vehicles per hour (vph) during AM and PM peak periods respectively (Figure 6, page 43 of TIS).
 - b. This off-ramp, with a length of about 1,400 feet, has a 2017 demand of 1,578 vph and 1,143 vph during the 2017 AM/PM peak hours respectively.
 - c. There is one lane at the entrance, 2 lanes at it terminus with Vine St. with a total storage distance of about 2,400 feet equivalent to a capacity of about 85 vehicles. Based on the data, the LOS is lower than LOS "A".
5. On page G-11 of TIS, the segment of US-101 between Western Ave. and Highland Ave. represents one of the congested bottlenecks in Los Angeles County with speeds well below the posted limit of 55 mph for both its north and south directions. The existing condition analysis on the mainline should reflect the existing demand and meet drivers' perception. Therefore, we do not concur with the existing conditions as listed in Table G-4, Existing Operating Conditions Freeway Segment Level of Service Evaluation.

6. For queuing analysis from pages G-19 to G-21, the analysis does not appear to reflect the existing conditions.
 - a. For example, Location No. 1, SB US-101 off-ramp at Vine St./Franklin Ave., the movements allowed are thru and right only with the right-turn movement that has an existing demand of 1,148 vhp vs. the thru movement with 130 vph. When calculating que length from those numbers, the results differ from those reflected in Table G-12.
 - b. As a reminder, Caltrans is concerned that additional traffic exiting the freeway may potentially back into the mainline through lanes if the queue exceeds the storage capacity on the off ramps. A queuing analysis should be performed using HCM methodology. The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with a safety factor. The existing queue length should be calculated from the traffic counts, actual signal timing, and the actual percent of truck assignments with an adequate passenger car equivalent factor.
 - c. Signal optimization should be considered as a mitigation measure.
7. From page 79 to page 83, Signal Warrant Analysis, before making a determination on the need of a traffic signal at every studied intersection, the warrant analysis needs to be conducted for all warrant cases including other safety measures, pedestrian, etc., and not just the peak-hour warrant. We note that, based on Table 13 (page 83 of TIS) Signal Warrant Analysis, a signal is needed at Location No. 25, Gower Street & US-101 Southbound Off-ramp/Yucca Street.
8. Storm water run-off is an important 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.
9. 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.

Ms. Kathleen King
May 30, 2019
Page 5

Per phone the conversation with traffic consultant, Gibson Transportation Consulting, Inc. on May 28, 2019, the developer understands Caltrans's traffic concerns and is willing to discuss further and possibly enter into a fair share agreement in the future. We may provide additional comments or concurrence based on any follow-up meetings. 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-2016-02420AL-DEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

CITY OF LOS ANGELES

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May 1, 2020

Transportation Engineering and Planning Consultant Firms

Subject: LADOT Transportation Assessments - Interim Guidance for Freeway Safety Analysis

On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This was required by Senate Bill (SB) 743 and the adoption of Section 15064.3 to the CEQA Guidelines. SB743 also provided that the change from delay, as described by level of service (LOS), to VMT analysis as the CEQA metric does not relieve a public agency of the requirement to analyze a project's potential significant impacts related to air quality, noise, safety, or any other impact associated with transportation. The purpose of this memorandum is to provide interim guidance on the preparation of freeway safety analysis for land use proposals that are required by LADOT to prepare a Transportation Assessment.

BACKGROUND

This freeway safety analysis interim guidance will help address the recent comment letters sent by Caltrans District 7 to the Department of City Planning on development project environmental documents. In these letters, Caltrans requested that environmental analyses for new land use development projects include freeway off-ramp safety considerations. Specifically, they requested that the City evaluate a development project's effects on vehicle queuing on freeway off-ramps. Such an evaluation would measure a project's potential to lengthen a forecasted off-ramp queue and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline.

In order to respond to these comment letters in absence of published guidelines by Caltrans that evaluate safety concerns on freeways, the City of Los Angeles Department of City Planning, in collaboration with LADOT and the Los Angeles City Attorney's Office, convened a Freeway Analysis Technical Working Group that included transportation engineering, planning, and environmental firms with a long history of preparing transportation analyses in Southern California. The goal of this Working Group was to establish interim guidance on how transportation assessments for land use proposals should review and analyze potential safety impacts on the freeway system. The Working Group, which met weekly throughout the month of April 2020, developed the steps described below to conduct a freeway safety analysis to determine if a project may potentially result in off-ramp queuing and differential travel speeds that could constitute a potential safety impact under CEQA.

The Working Group included staff from LADOT, the Department of City Planning, Los Angeles City Attorney's Office, and the following consultants:

- Cambridge Systematics, Inc.
- Gibson Transportation Consulting, Inc.
- Fehr & Peers
- Hirsch/Green Transportation Consulting, Inc.
- Iteris, Inc.
- Linscott, Law & Greenspan, Engineers
- The Mobility Group
- Overland Traffic Consultants
- Rincon Consultants, Inc.

It should be noted that new Caltrans Transportation Study Guidelines are expected to be released later this year to meet the State's deadline of July 1, 2020, which requires all California agencies to comply with SB743. Caltrans announced that their new guidelines will include a State Highway System safety analysis section. Therefore, the City's interim guidance is expected to be revisited once Caltrans releases the State guidelines to determine if changes are necessary.

FREEWAY SAFETY ANALYSIS STEPS

Effective immediately, land use development projects within the City of Los Angeles that are required to prepare a transportation assessment shall conduct a freeway safety analysis as follows:

1. Identify the number of Project trips expected to be added to nearby freeway off ramps serving the site. If the Project adds 25 or more trips to any off ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queueing impacts following the steps below. If the project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required.
2. Using Synchro analysis software, or similar tools, prepare a queuing study for the "Future with Project" conditions for the proposed project build-out year. LADOT's Transportation Assessment Guidelines provide recommended steps to forecast future traffic volumes.
3. To evaluate the adequacy of the existing and future storage lengths, use the 95th percentile queue provided from the Synchro results worksheet, and use 100% of the storage length on each lane of the ramp from the stop line to the gore point. If an Auxiliary Lane exists, add 50% of the length of the auxiliary lane to the ramp storage area.
4. If the Project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the Project increases the overflow onto the mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact. If the Project adds two or more car

lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour.

5. The speed differential would identify the operating speed of the freeway mainline lanes during the peak hour that corresponds to the peak hour during which the ramp is expected to experience project-related queue overflow. Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data including location-based services data from available sources could be used.
6. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact.
7. If the speed differential is 30 mph or more, then there is a potential safety issue. To offset this potential condition, the project should consider the following preferred corrective measures:
 - a. Transportation demand management program(s) to reduce the project's trip generation,
 - b. Investments to active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's trip generation, and/or
 - c. Potential operational change(s) to the ramp terminal operations including, but not limited to, lane reassignment, traffic signalization, signal phasing or timing modifications, etc. This option requires coordination with Caltrans and LADOT to assess feasibility and for approval of the proposed measure(s).

A physical change to the ramp itself (addition of auxiliary lane, ramp widening, etc.) may be considered. However, this change would have to demonstrate substantial safety benefits, not be a VMT-inducing improvement, and not result in other environmental issues.

8. If the cost of the physical change to the ramp is substantial, then a fair-share contribution to the improvement may be required if necessary requirements are met, including, but not limited to, Caltrans defining the improvement cost, and opening a Project File/Project Account to accept a financial contribution for the improvement. If required, the Applicant would pay the Project's fair-share of the improvement cost, and the fair-share contribution would be deposited in the Project Account to be used for the identified improvement.

We understand that Caltrans' direction on evaluating transportation impacts under CEQA continues to evolve. Relevant State documents are being drafted for release later this year, including a VMT-focused Transportation Impact Study Guide that guides Caltrans comments on land use project EIRs of local agencies, and a Transportation Analysis Framework that addresses how Caltrans evaluates the CEQA impacts of capacity-increasing projects on the State Highway System (SHS). While we look to these guidance documents to inform our methodology of safety impacts on freeway facilities, we release this

interim guidance to inform practitioners on the technical approach, developed by the Working Group that can be applied to project-level Transportation Assessments immediately.

If you have any questions, please email me at tomas.carranza@lacity.org or call me at 213-435-4056.

Sincerely,



Tomas Carranza, PE

Principal Transportation Engineer

c: Kathryn Phelan / John Fox, City Attorney's Office
Lisa Webber / Arthi Varma / Luci Ibarra, DCP
Rubina Ghazarian / Eddie Guerrero / Jesus Serrano, LADOT

Attachment 1

Freeway Safety Analysis Working Group

Findings

The City of Los Angeles formed a Working Group made up of City staff and transportation engineering and planning consultants to develop a policy to respond to Caltrans' requests that off-ramp safety considerations be included in the environmental analyses for new development projects. While SB 743 calls for the inclusion of safety considerations, Caltrans District 7 verbal and written comments focus on the potential backup of off-ramps onto the mainline freeway lanes as their primary safety concern.

Since Caltrans has not established a methodology or thresholds based on substantial evidence, the Working Group was tasked with developing a freeway safety analysis based on research, local traffic conditions, and best practices. The Working Group met weekly during the month of April 2020 to share research into the number of project trips that should constitute a threshold for triggering an off-ramp investigation, the issue of speed differential and its relationship to freeway safety, the ability to collect reliable mainline freeway speed data, and a study process to identify freeway locations where queuing and speed differential is a concern that should be addressed.

RECOMMENDED POLICY DRAFT

The recommendations by the Working Group, which are summarized in the cover memorandum, were developed based on research, a review of best practices, and an analysis of local data. The first step was to determine when an off-ramp near a proposed project should be studied. The consultants participating in the Working Group researched their previous project transportation assessments to identify the level at which project-related traffic can cause traffic to back up onto the freeway. From these case studies, over 100 off-ramps were evaluated and it was determined that very few of these locations were expected to result in queues extending onto the freeway. So, this is not a common occurrence.

Project trips added to an off-ramp varied between one trip and over 100 trips per hour. Very rarely did an evaluated off-ramp result in a projected back-up onto the mainline.

Screening Threshold

The Working Group recommended a screening threshold of 25 or more project trips during a peak hour assigned to an off-ramp as the threshold for selecting that off-ramp for further study. The consultants on the Working Group cited inconsistencies in the direction given by Caltrans District 7 for different projects. In one case, a large land use proposal near the junction of two major downtown freeways was estimated to generate over 800 trips in each of the peak hours. Caltrans requested the analysis of up to 16 interchange ramps. During the project traffic assignment, the project was expected to generate 25 or more peak hour project trips at only four of the off-ramps. A screening threshold of 25 or more project trips was identified by the Working Group as a reasonable threshold to measure those ramps

where congestion already exists, while eliminating the locations where the addition of fewer project trips is not expected to cause a backup onto the freeway.

Speed Data Source

The Working Group discussed the premise that a queue extending onto the freeway mainlines is a safety concern when the speed on the freeway was high enough to potentially lead to a collision because freeway mainline traffic did not have enough time to stop safely. So the group discussed how to consistently determine the actual operating speed of the mainline of a particular freeway, in the appropriate direction, during the affected peak hour. Two data sources were discussed: Caltrans Performance Measurement System (PeMS) data and big data platforms that aggregate location based services data such as StreetLight Data, NPMRDS, or other available sources.

The group agreed that the needed speed data can be collected from PeMS - a source managed by Caltrans. PeMS data can be obtained in graphic and tabular formats which make it easy to identify the mainline speed at the correct spot on the freeway during the right hour in the appropriate direction. The group determined that for some of the freeways with relatively less traffic (e.g., SR 170), there were freeway segments where the data points were less robust. Freeway segments near Downtown Los Angeles, Hollywood, and the West side did not have this problem.

Speed Differential

The Working Group evaluated the amount of speed differential that could be used to define a safety issue. A freeway mainline operating at slow speeds during the peak hour did not present the safety concerns compared to a mainline operating at higher speeds.

Research revealed hundreds of studies related to speed differential analyses with not much agreement on their effects on safety. However, the research did yield information on the severity of collisions at varying speeds. The two most relevant studies suggested 30 mph as the critical speed differential level that would apply to freeway segments. The Caltrans Design Manual does not provide Decision Sight Distance readings for speeds less than 30 mph, implying that speeds less than 30 mph may not be an issue on freeway segments.

According to the [Texas Transportation Institute](#): “Drivers are usually aware that they are closing in on a slower vehicle; however, if there is a large speed differential (over 25 mph) they often have a very poor perception of just how quickly they are closing in until they get very close to the slower vehicle. Often that can be too late, especially when the faster vehicle is a heavy vehicle that needs more room to brake. The slower vehicles risk getting rear-ended; the faster ones risk being cut off by turning or lane-changing drivers who think they have an adequate gap in traffic but do not.”

Based on this literature research, the Working Group selected 30 mph as the speed differential included in this interim guidance. At less than 30 mph, the stopping sight distance related to driver’s perception and reaction times is much lower, thereby minimizing the potential for a collision.