DEPARTMENT OF TRANSPORTATION
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June 22, 2017

Mr. William Lamborn
City of Los Angeles, Dept. of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: Hollywood and Wilcox
Notice of Preparation (NOP) for DEIR
SCH# 2017051079
IGR# 07-LA-2017-00931-FL
Vic. LA/ 101/ PM 7.588

Dear Mr. Lamborn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

The proposed project is a mixed-use project includes 260 multi-family units and approximately 17,800 square feet (sf) of retail and restaurant uses on a 1.4-acre project site. The existing two-story, 9,000 sf Attie building, located at the corner of Hollywood Blvd. and Wilcox Ave. will be retained and integrated with the proposed project. The new construction would range from 1 to 15 stories with a maximum height of 160 feet. Also, approximately 402 parking spaces would be provided on two subterranean and three on- and above-grade levels.

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. However, the City may use the Level of Service (LOS) methodology until The Governor's Office of Planning and Research (OPR) complete its CEQA Guideline to implement SB743 (https://www.opr.ca.gov/s_sb743.php).

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "*provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability.*"

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.

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 (FHW A) 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.

Caltrans understands that the current General Plan and new transportation performance measures and CEQA thresholds have not being updated to VMT (Vehicle Miles Traveled) at the time. Caltrans is concerned that when traffic generated by the project, along with cumulative traffic is expected to use an off-ramp that is operating at or near capacity, the additional traffic may potentially exceed the off-ramps capacity and back up onto the mainline freeway.

If the City is still using LOS methodology when conducting the traffic impact analysis, to assist Caltrans in evaluating the impacts of this project on State transportation facilities, the following comments should be considered and the project's traffic consultant should be referred to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Listed below are some elements of what is generally expected in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to freeways, immediate and alternative on/off ramp accesses that is within the project site. The direct US-101 freeway access to the proposed site to be analyzed which includes: ramps, ramps influence areas (acceleration/deceleration lanes), weaving areas, and freeway segment onto off-ramp and from on-ramp; such that including the following locations:

    - SB/NB US-101 on/off-ramps at Cahuenga Blvd.
    - SB/NB US-101 on/off-ramps at Franklin Ave./Vine St.
    - SB/NB US-101 on/off-ramps at Argyle Ave./Franklin Ave.
    - SB/NB US-101 on/off-ramps at Gower St./Beachwood
    - SB/NB US-101 on/off-ramps at Hollywood Blvd.

2. Caltrans is concerned that additional traffic existing on the freeway may potentially back into the mainline through lanes if the queue exceeds the storage capacity on the off-ramps. Queuing analysis for all the off-ramps between Cahuenga Blvd. and Hollywood Blvd. should be performed using HCM methodology. Currently, US-101 operates at an LOS of E/F during

AM/PM peak periods.

An off-ramp queuing analysis should be conducted utilizing the Highway Capacity Manual (HCM). 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 some safety factor (85% total queue length) or other methods approved in advance by Caltrans. The existing queue length should be calculated from the traffic counts and the percent of truck assignments with an adequate passenger car equivalent factor. The analyzed result may need to be calibrated with actual signal timing when available. Please include mitigation measures if forecasted vehicle queues are expected to exceed available storage capacity with reasonable safety factor.

3. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area with and without the project. Future conditions including built-out and plan-horizon years. It is also recommended that the report include AM/PM peak hour volumes for bicycle under the existing conditions.

4. Analysis should include existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.

5. A discussion of multi-modal mitigation measures, including possible Active Transportation enhancements, appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or Transportation Demand Management (TDM) should be justified and the results conservatively estimated.

6. Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on- and off-ramp and freeway terminus intersection with local streets. Caltrans recommends the traffic study, especially in the proposed project vicinity of the off-ramps, to include the impact of the traffic from pedestrians and bicyclists. Caltrans will work with the City to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists.

7. Fair share contributions toward pre-established or future improvements on the State Highway System is considered to be an acceptable form of mitigation. Please use the following ratio when estimating project equitable share responsibility: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guide).

   Please note that for purpose of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes, which include build-out of all approved projects, project that have not yet been approved, and other sources of growth.

This project is well-served by public transit and is approximately 0.25 miles away from a high-frequency subway station (Metro Red Line) and several bus lines. This context should be considered when exploring how to reduce traffic-related impacts.

Additional measures to reduce transportation-related impacts may include but not limit to providing transit passes and/or other resources to building tenants that promote using sustainable transportation modes. Doing so could make the project more consistent with statewide environmental policies such as AB 32, SB 375, and governor issued Executive Orders to reduce greenhouse gas emissions such as S-3-05 and B-16-12 by promoting bicycling as an alternative to driving.

If you have any questions or concerns regarding these comments, please feel free to contact project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

DIANNA WATSON
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse