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July 21, 2017

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Re: Hollywood and Wilcox Project

Thank you for your recent correspondence, dated June 22, 2017, relative to the Hollywood and Wilcox Project (Project) and the application of Caltrans' traffic study guide. In response to your comment, we are providing this communication to explain the methodology the City intends to use and the City's reason for not using the 2002 Guide.

Pursuant to the MOU (Freeway Analysis Agreement) between Caltrans and the Los Angeles Department of Transportation (LADOT), the methodologies and assumption used to prepare the Project traffic study will comply with the screening criteria included in the executive Freeway Analysis Agreement (Agreement) as agreed upon by the City and Caltrans. The City's continued reliance on the Agreement is based on verbal direction from Caltrans that the Agreement will remain in effect until such time as the City formally implements a Vehicle Miles Traveled (VMT) methodology.

In your June 22, 2017 letter, you recommend that the City utilize the 2002 Caltrans' "Guide for the Preparation of Traffic Studies." (2002 Guide),¹ to analyze impacts to State highway facilities. As discussed below, the City finds that the City's reliance on the 2002 Guide would be inconsistent with more recent Caltrans' guidelines and that State law those updates guidelines are intended to implement. Specifically, the "Local Development – Intergovernmental Review Program Interim Guide" (LD-IGR), dated November 2016, expressing provides that in commenting on local projects, including development projects, the LD-IGR supersedes the 2002 Guide:

"In the interim, this Interim Guidance document intends to ensure that all Caltrans LD-IGR comments on growth plans, development project, and infrastructure investments align with state policies... We also continue to recognize that under the California Environmental Quality Act (CEQA), it is ultimately the Lead Agency's responsibility to perform a CEQA analysis, set local thresholds of significance, analyze potential impacts, determine significance, and identify, implement, and monitor any required mitigations.

¹ http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

This guidance supersedes the 2002 Caltrans Guide for the preparation of Traffic Impact Studies in comments to local agencies. ...

In order to ensure alignment of Caltrans comments with state goals described above, LD-IGR comments henceforth 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. ...”²

The LD-IGR program is intended to implement recent legislation related to State Climate Change goals and sustainable land use and transportation practices, such as AB 32 (2006), SB 375 (2008), SB 226 (2011), SB 743 (2013), and planning guidance relative to the Smart Mobility Framework, Complete Streets Implementation Action Plan, the California Transportation Plan 2014, and Caltrans’ adoption of the Strategic Management Plan 2015-2020 (SMP).

As indicated in the LD-IGR quote above, the explicit direction is to consider “multi-modal solutions from existing regional transportation plans, regional plans, transit plans, bicycle plans, and pedestrian plans.” Moreover, it calls for Lead Agencies to implement the goals of the SMP, and states that the SMP is *not intended to be used or interpreted* “as specific thresholds in the review of individual development projects.” The SMP identifies specific targets and objectives related to the LDG-IR, including, but not limited to: doubling of walking and transit; tripling of bicycle trips as percentage of overall trips; a reduction of per capita vehicle miles traveled (VMT); a reduction of the number of fatalities in each travel mode; improve the quality of life for all Californians by providing mobility choice; and reduce peak period travel times and delay for all modes through intelligent transportation systems, operational strategies, demand management, and land use/transportation integration.

Based on the above, we find that the 2002 Guide is not aligned or consistent with current State law in regards to transportation analysis and as such, the City intends to continue its reliance on the Agreement in preparation of its traffic studies, including for the Project, until such time as the VMT methodology is formally released.

The City is currently undertaking its effort to establish a VMT methodology, which is tentatively slated for release by the end of 2017. In the interim, the Department of City Planning and LADOT will be beta testing a VMT Calculator, in conjunction with our current methodology for development project EIRs to inform what the potential VMT impacts could be and identify potential mitigation that promote other travel modes in line with the SMP. The result of the beta testing will be available for your review upon release of a Draft EIR.

The City of Los Angeles recognizes that Caltrans has expressed a desire to establish a funding mechanism to mitigate cumulative transportation impacts, where those exist. To that end, mitigation fees cannot be extracted unless a study has been conducted to clearly demonstrate the nexus between the project impact and the mitigation measure. The City recommends that Caltrans consider a Freeway System Nexus Study that identifies an improvement plan for the freeway system, establishes a nexus between new development and regional traffic impacts, identifies specific improvements, and establishes a fee program with a legal mechanism allowing for the exaction of mitigation fees. Such a program would be highly advantageous to the region as it could provide another significant funding source for transportation improvements to the State Highway System. Until then, fees collected by Caltrans from developments are conducted only through non-transparent negotiations and on a voluntary basis and are not tied to the traffic analysis, provide no assurances as to the specific physical improvements they are intended to address, or when those improvements will take place. The City has no mechanism

² See page 3 at: <http://www.dot.ca.gov/hq/tpp/documents/LDGIGRInterimGuidanceApproved.pdf>

to collect funds from private developments for improvements within another jurisdiction. Please keep the City of Los Angeles informed as to your efforts to undertake such a study so that it may be reflected in future MOUs between Caltrans and LADOT.

The City looks forward to your comments on VMT, recommendations on smart land use, multi-modal access, reducing single occupant vehicle trips, and safety for all users as we move forward in our implementation of recent state legislation, including SB 743, which mandates that CEQA review focus on VMT.

Sincerely,



Luciralia Ibarra
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