

DEPARTMENT OF TRANSPORTATION

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December 21, 2020

Bradley Furuya
City of Los Angeles
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Sunset + Wilcox Project – Notice of
Preparation of an Environmental Impact
Report (NOP)
SCH # 2020120005
GTS # 07-LA-2020-03440
Vic. LA-2/PM: 11.321

Dear Bradley Furuya:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The Project includes the development of a 15-story commercial building with a total floor area of 445,218 square feet, consisting of 431,032 square feet of office space and 14,186 square feet of ground floor retail/restaurant space. The Project also includes the construction of an 18-foot-tall, 3,550-square-foot building to house Los Angeles Department of Water and Power (LADWP) equipment and an underground generator. The area proposed for this use would not constitute floor area as defined by the Los Angeles Municipal Code (LAMC). As part of the Project, the existing office uses, retail uses, and surface parking would be demolished. Upon completion, the Project would result in a net floor area of 418,957 square feet on the Project Site and a floor area ratio (FAR) of 6:1. Additionally, the Project would provide a total of 1,291 vehicular parking spaces. Although not required, the Project would also provide a variety of private open space areas totaling 61,449 square feet. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 3,000 feet away from the US-101 & Argyle Avenue ramps and approximately 1.5 miles away from the State Route 2 (SR-2, aka Santa Monica Boulevard) and US-101 interchange. The project is also located within a Transit Priority Area, because it is approximately .5 miles away from the Metro Hollywood & Vine Station. From reviewing the NOP, Caltrans has the following comments:

- For information on determining transportation impacts in terms of Vehicles Miles Traveled (VMT) on the State Highway System, see the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- The City can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.

- The updated TISG states, “Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues.” Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated July 2020 and found here, for the County’s reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf>.
- Caltrans looks forward to reviewing the VMT analysis for this project. As discussed in Caltrans’ new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR’s Technical Advisory.

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 Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the TDM strategies this project has incorporated, such as providing 143 bicycle parking spaces. Additional TDM strategies that the City may want to consider integrating into this project in order to further reduce VMT include:

- Verify that no more parking than required by the local permitting agency is provided.
- Ensure that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.
- Replace removed trees with trees that would provide shade to pedestrians.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic control plan detailing these delays for Caltrans’ review.

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-2020-03440.

Sincerely,



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