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Jun 09 2020

STATE CLEARINGHOUSE

June 8, 2020

Mr. Alan Como, AICP
Department of City Planning
City of Los Angeles
221 N Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: 6220 West Yucca Project
SCH# 2015111073
GTS # LA-2020-03240-DEIR-AL
Vic., LA-101, PM 7.058

Dear Mr. Como:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The 6220 West Yucca Project proposes to redevelop an approximately 1.16-acre (net area) property (Project). The project would include 210 multi-family residential units, 136 hotel rooms and approximately 12,570 square feet of commercial/restaurant uses in two buildings.

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 single occupancy vehicle 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.

The Project Site is located on the south side of West Yucca Street between Argyle Avenue and Vista Del Mar Avenue in the Hollywood Community of Los Angeles, approximately five miles northwest of Downtown Los Angeles. The Project Site is served by a network of regional transportation facilities. One of the City's larger and more recent projects, the Hollywood Center Project and this Project are located in an approximately 300 foot radius of the US-101. Also, trips from both projects will likely utilize the same State facilities.

The Project Site is located in an area served by public transit services such as the Metro Red Line, Metro Local 2, Metro Local 180/181, Metro Local 207, Metro Local 210, Metro Local 217, Metro Limited 302, Metro Rapid 757, Metro Rapid 780, LADOT DASH Beachwood Canyon, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire.

The existing bicycle network consists of several types of bicycle facilities. Bicycle lanes are a component of street design, with dedicated striping that separates vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. In contrast, bicycle routes and bicycle-friendly streets are located on collector and lower volume arterial streets where motorists and cyclists share the roadway without dedicated striping for a bicycle lane. Streets with dedicated bicycle lanes, sharrows, and other bicycle friendly elements include Franklin Avenue east of Argyle Avenue, Yucca Street west of Vine Street, Yucca Street between Vine Street and Argyle Avenue, Selma Avenue, Cahuenga Boulevard north of Yucca Street, Vine Street south of Yucca Street, and Argyle Avenue between Franklin Avenue and Selma Avenue.

The Project would provide on-site long-term and short-term bicycle parking consistent with the City's Bicycle Parking Ordinance. Streetscape, landscape, and lighting improvements would enhance pedestrian activity and walkability in and around the Project Site. This pedestrian and bicycle accessibility would serve to improve first/last mile access to nearby transit services, including the Metro Red Line.

The Project would also provide electric vehicle charging in the proposed parking structure. PDF-GHG-2 requires that at least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). In addition, PDF-GHG-3 requires that at least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations.

The project mitigation measure MM-TRAF-1 Transportation Demand Management (TDM) Program includes at a minimum, the following:

- Unbundled Parking: Provision of unbundled parking for residents (i.e., parking space is leased separately from dwelling units);
- Promotions and Marketing: Employees and residents shall be provided with materials and promotions encouraging use of alternative modes of transportation. This type of campaign would raise awareness of the options available to people who may never consider any alternatives to driving;
- Incentives for using alternative travel modes (such as transit passes);
- Guaranteed ride home program for employees;
- Short-term car rentals; Parking incentives and administrative support for formation of carpools/vanpools; and/or
- Participation as a member in the future Hollywood Transportation Management Organization (TMO), when operational. TMO is an organization that helps to promote some TDM services to a community by providing information about available public transportation options and matching people into ridesharing services.

The mitigation measure MM-TRAF-1 would implement a TDM program that would result in vehicle trip reductions.

Caltrans commented on the Notice of Preparation for this project in December 2015. Since then, the City of Los Angeles has adopted a VMT metric for transportation analysis in July 2019, in accordance with Senate Bill 743 (2013). As such, Caltrans has reviewed this DEIR from a VMT perspective rather than a level of service perspective.

The Project would generate 11,929 daily VMT (a reduction of 678 daily VMT after TDM), which includes a home-based production daily VMT of 2,862 and a home-based work attraction daily VMT of 796. The Project would generate an average household VMT per capita of 6.0 (1.4 less than prior to mitigation). With mitigation the Project would not exceed the household VMT per capita threshold of 6.0. Though the impact for work VMT for the Project would be less than significant without mitigation, the TDM program would further reduce the average work VMT per employee of 7.1 (compared to the 7.6 Impact Threshold). Thus, with the incorporation of mitigation measure, the Project would meet the threshold criteria of being 15% less than the existing average household VMT per capita for the Central APC area that this project is located in, and the household VMT impact would be reduced to a less than significant level.

Despite this project's less than significant VMT impacts, Caltrans still has unaddressed safety (i.e. potential traffic conflict) related concerns with this project. Please note that Caltrans is still in the process of developing its new traffic impact study guide, which will include guidance on how to conduct safety analyses on the State facilities. This guide is not expected to be released until later this year.

Mr. Alan Como, AICP
June 8, 2020
Page 4

As a reminder, 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, in reviewing the draft environmental document, we are not satisfied that our concerns have been fully 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. In particular, we would like to discuss, among other things, the distribution percentages to US-101 and its ramps, the appropriate storage length with a reasonable factor of safety, the proper ramp configurations, the signal timing references for signalized intersections, and the cumulative project trips. 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.

We look forward to continue working with the City of Los Angeles to ensure local and state transportation facilities remain safe for the traveling public.

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.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse