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Governor's Office of Planning & Research

Jul 06 2020

STATE CLEARINGHOUSE

*Making Conservation
a California Way of Life.*

July 6, 2020

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

RE: Sunset Gower Studios Enhancement Plan –
Draft Environmental Impact Report (DEIR)
GTS # 07-LA-2018-03271
SCH # 2018021071
Vic. LA-101/PM: 6.426

Dear Jason McCrea:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced DEIR. The Sunset Gower Studios Enhancement Plan involves the removal of 160,611 square feet of existing floor area and the construction of 627,957 square feet of new floor area, consisting of 599,335 square feet of creative office space and 27,172 square feet of production support space. Total net new proposed floor area is 467,346 square feet. Overall, the project would result in a total of 852,792 square feet of creative office space, 53,778 square feet of production support, 169,412 square feet of sound stages, and 6,516 square feet of restaurant space on the project site, with a total floor area of 1,083,948 square feet. The new uses would be within three buildings on a 15.9-acre portion of the site. When averaged over the 15.9-acre project site, the Floor Area Ratio of the project is 1.47:1. The project also includes the construction of up to 1,335 new parking spaces. The project site's existing 1,398 parking spaces would remain, meaning the site would have a total of 2,733 spaces. The City of Los Angeles is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 2,500 feet away from the United States 101 (US-101) on- and off-ramps at Sunset Boulevard. It is also located approximately 2,700 feet away from the intersection of Gower Street and State Route 2 (SR-2, also known as Santa Monica Boulevard).

Caltrans commented on the Notice of Preparation for this project in a letter dated March 27, 2018. Since then, in July 2019 the City of Los Angeles adopted a Vehicle Miles Traveled (VMT) metric for transportation analysis, in accordance with Senate Bill 743 (2013) as described in the DEIR. In addition, this month Caltrans released its updated VMT-focused Transportation Impact Study Guide. As such, Caltrans has reviewed this DEIR from a VMT perspective rather than a level of service perspective, and has the following comments.

Based on the City of Los Angeles' VMT calculator, the project would not result in a significant VMT impact, with or without the implementation of project design features such as a Transportation Demand Management (TDM) program, which should decrease VMT. Specifically, prior to the implementation of project design features, the project would generate an average work VMT per employee of 6.2, which falls below the significance threshold of 7.6 for the project's area. After the implementation of project design features, the project would generate an average work VMT per employee of 5.8, which still falls below the significance threshold of 7.6 for the project's area. Furthermore, cumulative impacts would also be less than significant because according to the 2018 State Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA, "...a finding of a less-than-significant project impact would

imply a less than significant cumulative impact..." for a project that falls below an efficiency-based threshold, such as VMT per employee, and is aligned with long-term environmental goals and relevant plans. This project meets those criteria.

Despite the project's less than significant impacts, the CEQA Analysis Memo included in Appendix J.1 states that in addition to implementing a TDM program, the project may also include "...contribution towards transportation systems management improvements within the study area, and specific intersection improvements." Some of the transportation systems management (TSM) improvements that are included in the table on page 55 of Appendix J are proposed on US-101 and SR-2. Encroachment permits are required for any project work on or near Caltrans right of way. However, this decision will be subject to additional review by the Office of Permits. In the meantime, please provide Caltrans with a complete list and implementation dates of any TSM, TDM, or intersection improvements that will affect Caltrans intersections.

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 VMT and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the TDM program that this project will implement. Additional TDM and complete streets strategies that the City of Los Angeles may want to consider integrating into this program include:

- Ensure that the amount of vehicle parking provided is no more than required. Consider reducing parking through providing additional bicycle or carpool spaces.
- Offer bicycle parking that is secure, convenient, and accessible.
- Provide a conveniently located on-site bicycle repair station.
- Increase the one-time fixed fee contribution to the City's Bicycle Plan Trust, as Caltrans estimates that the current contribution of \$75,000 would only be able to fund an approximately ¾ mile long Class II bike lane.
- Confirm that project site driveways are designed to allow vehicle drivers to clearly see any approaching pedestrians or bicyclists at a safe sight-distance.

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 supports "...scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible" as stated in the Executive Summary. Since the truck haul route from the project site is anticipated to be Sunset Boulevard to the US-101, please submit the Construction Traffic Management Plan with details on potential delays from truck traffic on the US-101 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-2018-03271.

Sincerely,



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