

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

August 17, 2020

8/17/2020

**Governor's Office of Planning & Research**

**Aug 17 2020**

**STATE CLEARINGHOUSE**

Rachel Kwok  
City of Santa Monica  
1685 Main Street  
Santa Monica, CA 90401

RE: Ocean Avenue Project – Draft  
Environmental Impact Report  
(DEIR)  
SCH # 2018121060  
GTS # 07-LA-2019-03259  
Vic. LA-1/PM: 35.469

Dear Rachel Kwok:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned project's Draft Environmental Impact Report (DEIR). The proposed Project comprises 248,570 square feet (sf) of mixed-use development – including 120 hotel guestrooms, 100 residential units, restaurant and retail uses, and a Cultural Use Campus (e.g., museum, art gallery, etc.) – in the Downtown District of the City. Two City-designated Landmarks located at 1333 Ocean Avenue and 1337 Ocean Avenue would be relocated onsite and integrated into the proposed Cultural Use Campus. The proposed Project would include the development of five buildings ranging in height from 57 feet to 130 feet with a publicly-accessible rooftop observation deck atop the 130-foot-tall Hotel Building. The proposed Project would provide 40,920 sf of open space – including 22,407 sf at ground level (e.g., pedestrian-only paseos, pedestrian breezeway, and publicly-accessible courtyard) – along with widened sidewalks along 2nd Street and Santa Monica Boulevard.

Under Senate Bill 743 (2013), CEQA review of transportation impacts of a proposed development are adapting to eliminate consideration of delay-and capacity-based metrics such as level of service (LOS) and are instead focusing analysis on another metric of impact, "Vehicle Miles Traveled (VMT)". Effective July 1<sup>st</sup>, 2020, Caltrans is replacing LOS with VMT when evaluating traffic impacts.

For any future project we encourage the Lead Agency to adopt or develop a verifiable performance-based Vehicle Miles Travelled (VMT) criteria as required by SB 743.

After reviewing the project's DEIR Caltrans has the following comments:

- Table 3.13-10 indicates that a potentially significant impact may occur to the state transportation/circulation system. As indicated in the DEIR, a TDM Plan and a CIMP will

be completed, upon completion please send both documents and any other transportation plans to Caltrans for further review as our facilities may be impacted by this project.

- Please consider scheduling the construction working hours during off peak hours to the maximum extent possible. This may minimize congestion and provide higher levels of safety to the pedestrians and vehicular traffic on the streets and freeway.
- In order to increase pedestrian safety, please consider the installation of RRFB (Rectangular Rapid Flashing Beacons) for the existing Santa Monica Blvd. (SR-2) pedestrian crossing on the corner of Santa Monica Blvd. (SR-2) and Ocean Ave.
- Please consider including a VMT analysis that looks at potential safety concerns to Caltrans facilities as part of the proposed Final EIR. (<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf>)
- The DEIR indicates that significant earth moving activities may take place during construction. Please consider covering all vehicles hauling dirt and sediment as unplanned spills can potentially adversely impact the performance of the state highway system.

Further information included for your consideration:

Please consider integrating transportation and land use in a way that reduces 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.

Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improves safety by lessening the time that the user is in the likely path of a motor vehicle. Caltrans recommends the project consider the use of methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

Also, storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan.

As a reminder, 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. We recommend large size truck trips be limited to off-peak commute periods

Rachel Kwok  
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If you have any questions regarding these comments, please contact project coordinator Reece Allen, at [reece.allen@dot.ca.gov](mailto:reece.allen@dot.ca.gov) and refer to GTS# 07-LA-2019-03259.

Sincerely,

*Frances Duong for*

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