

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life*

February 11, 2022

Governor's Office of Planning & Research

Feb 11 2022

STATE CLEARINGHOUSE

William Lamborn
City of Los Angeles
Department of City Planning
221 N. Figueroa St., Room 1350
Los Angeles, CA 90012

RE: 670 Mesquit
SCH # 2017041071
Vic. LA-101/PMS0.202, LA-05/PM 17.01,
LA-10/PM 18.3
GTS # LA-2017-03813-DEIR

Dear William Lamborn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The 670 Mesquit Project (Project) proposes to construct a new mixed-use development totaling up to 1,792,103 square feet of floor area (the Project) on approximately 5.45 acres of land at 670 Mesquit Street (Project Site), along the southeastern edge of the Artists-in-Residence District within the Central City North Community Plan area of the City of Los Angeles (City).

The Project would have a floor area ratio (FAR) of up to 7.5:1, and would consist of the following primary components: creative office space totaling up to 994,055 square feet; a 236-room hotel; 208 multi-family residential housing units; an Arts District Central Market (food hall), a grocery store, and general retail uses totaling up to 136,152 square feet; restaurants totaling up to 89,577 square feet; studio/event/gallery space and a potential museum totaling up to 93,617 square feet; and a maximum 62,148-square-foot gym. The Project would provide parking for a total of up to 3,500 vehicles using a combination of automated parking systems, valet parking, or other efficiency parking methods and parking would be provided in below-grade, at-grade, and above-grade structured parking spanning the Project Site.

In addition, the Project may include a Deck Concept (Project with the Deck Concept) that would involve construction of a 132,000 square foot Deck that would extend over a portion of the freight and passenger rail lines and rail yards (Railway Properties) east of the Project Site.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

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, this project should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car 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. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We 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. For the additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

As a reminder, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources as a reference at the following links for this project:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.

When a potential safety impact is identified, Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for this development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

Transit

The Project site is served by several transit lines. The Project is located ¼-mile from the Metro Rapid 720 bus stop at Decatur Street & 7th Street and ½-mile from the Metro Rapid 760 bus stop at Alameda Street & 7th Street. Three Metro Local bus routes also run within a ¼-mile of the Project Site. Metro Local Route 60 runs on 7th Street and Santa Fe Avenue, and Metro Local Routes 18 and 62 run on 7th Street and Whittier Boulevard. The LADOT Downtown Area Short Hop (DASH) A route has its nearest stop approximately 0.4 miles away from the Project at the corner of Molino Street & Palmetto Street. The various transit routes providing service within walking distance of the Project site. In addition, the Project site is one mile from the Metro Gold Line Pico/Aliso station and approximately two miles from the 7th Street/Metro Center Station and the Union Station transportation hub.

LADOT's *Moving Forward Together* project, which conducted a detailed transit service analysis of LADOT Transit's network, identified a potential route expansion for DASH Downtown Route F, which currently runs between the Financial District and Exposition Park. The potential expansion would connect Exposition Park to Union Station through the Arts District via 7th Street and Santa Fe Avenue.

The Regional Connector, currently under construction, will better link the Metro L (Gold) Line with the rest of the LA Metro network. As a result of the Regional Connector project, Intersection 4 (Alameda Street & 1st Street) will be reconfigured by 2022 when the Regional Connector project is forecasted to be completed. Future scenarios in this report assume the proposed intersection configuration as provided by LADOT. Potential future expansions to the transit network under study by Metro include the Red/Purple Line extension into the Arts District along the LA River (EIR under development by Metro) and the West Santa Ana Branch Transit Corridor along Alameda (currently in the Metro planning process). The potential Red/Purple Line extension would include a station at 6th Street, adjacent to the Project site.

Bicycle and Pedestrian

The *Mobility Plan 2035* identifies corridors proposed to receive improved bicycle, pedestrian and vehicle infrastructure improvements. The Los Angeles River Revitalization Master Plan also outlines significant bicycle and pedestrian investment along the LA River in downtown (as indicated by the LA River Bike Path). If the river revitalization plan is approved and completed, the Project will be adjacent to the PARC which provides a connection to the facilities along the river and creates a new regional link.

The Arts District won an Active Transportation Program (ATP) grant in 2018 that will allow construction of facilities that improve mobility through bicycle and pedestrian infrastructure. The plans call for new bicycle lanes on Traction Avenue, Mateo Street, and other minor collectors in the Arts District. A protected bike lane is proposed for Santa Fe Avenue north of 1st Street. Pedestrian improvements as part of the ATP grant include new crosswalks at major intersections in the Arts District, including a raised crosswalk at Santa Fe Avenue & 6th Street. Pedestrian Activated Signals are proposed for several crossings along 4th Place, and over a dozen curb extensions/ADA ramps are proposed throughout the area. The Arts District Mobility Improvements will not result in the reconfiguration of any study intersections.

VMT Analysis

The Project is estimated by the City of Los Angeles VMT Calculator to produce a total of 27,040 daily vehicle trips and a total daily VMT of 195,304. The Project with the Deck Concept is estimated by the Calculator to produce a total of 27,493 daily vehicle trips and a total daily VMT of 198,540. The daily residential VMT per capita is estimated at 4.0 for both Project options, below the threshold of 6.0 daily residential VMT per capita for the Central APC. Thus, neither Project option would have a significant impact on residential VMT per capita as estimated by the VMT Calculator. The daily work VMT per employee was estimated for both Project options and is estimated at 6.6, which is below the threshold of significance for the Central APC of 7.6 daily work VMT per employee. Thus, the Project and the Project with the Deck Concept would not have a significant impact on daily work VMT per employee as estimated by the VMT Calculator. In order to ensure

this estimated outcome is accurate with reality condition in the future, a post-development VMT analysis with all mitigation measures should be prepared. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

Since the retail components of the Project are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model. The Project with the Deck Concept includes more land uses and programming and results in a higher VMT than the Project. Therefore, the Project with the Deck Concept's results are presented to be conservative. The City's model estimated a total daily VMT of 96,866,000 miles within a 12-mile radius of the Project TAZ when run without the retail components of the Project with the Deck Concept. With all the Project with the Deck Concept retail uses included, the model estimated a total daily VMT of 96,898,000 miles within a 12-mile radius of the Project TAZ. This is a net increase of 32,000 daily miles, or a 0.03% increase from the network before the retail was added. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to regional retail occurs.

The Project proposes to implement a transportation demand management program as mitigation to reduce the VMT impacts and trip generation of the Project. A TDM program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The Project as proposed includes compliance with regulatory requirements and site design elements that would be expected to enhance the usage of walking, biking, and transit modes as alternatives to the automobile.

Transportation Demand Management

The Project will provide long-term and short-term bicycle parking, bicycle showers, and secure bicycle parking in accordance with the requirements of the proposed Mesquit Specific Plan. The site will be designed to encourage walking, biking, and taking transit. Additional TDM program elements could include measures, such as unbundled parking and discounted transit passes.

The following potential TDM strategies would be applicable for employees working at the proposed Project office and commercial uses and residents living in the dwelling units:

- Commute trip reduction program for office and commercial workers and residents. Also includes TDM marketing and promotion (website and possible mobile app for transportation information specific to the Project).
- Parking cost unbundled from leases for office and commercial tenants, coupled with employee parking cash-out and pricing workplace parking.
- Parking costs unbundled from rent for residential tenants.
- Tenants in the office and commercial uses and residents would be provided with the opportunity to obtain subsidized/discounted daily or monthly public transit

passes to use locally/regionally. These passes can be partially or wholly subsidized by the employer and residential management company, respectively.

- A ride-sharing program would be provided by designating a certain percentage of parking spaces for ride sharing vehicles, designing adequate passenger loading/unloading and waiting areas for ride-sharing vehicles, and providing a website or message board for coordinating rides.
- Enhancements/amenities, such as curb cuts and continental crosswalks, at bus stops nearest to Project site:
 - Decatur Street & 7th Street: Metro Rapid 720
 - Alameda Street & 7th Street: Metro Rapid 760
 - Imperial Street & 7th Street: Metro 18, 60, 62
 - Molino Street & Palmetto Street: LADOT DASH A
- Improved first-mile/last-mile connections to nearby bus stops
- Mobility hub (carshare, bikeshare, bike repair facilities, and real-time transit information)

With the TDM program, the estimated total daily vehicle trips are projected to be reduced from 27,040 to 24,484 for the Project and from 27,493 to 24,901 for the Project with the Deck Concept. The estimated total daily VMT is projected to be reduced from 195,304 to 176,517 for the Project and from 198,540 to 179,481 for the Project with the Deck Concept. The daily residential VMT per capita is projected to be reduced by 18% from 4.0 to 3.3 for both Project options, which would continue to not be a significant impact under the City's criteria. The daily work VMT per employee is projected to be reduced by 18% from 6.6 to 5.4 for both Project options, which would continue to not be a significant impact under the City's criteria. Nevertheless, the retail VMT impact would remain significant and unavoidable.

Freeway Safety Analysis

For the freeway safety analysis, the Project is projected to add 25 or more trips to the following freeway off-ramps:

- Study Intersection 22: I-10 Eastbound Off-ramp to Alameda Street (AM PH)
- Study Intersection H: US-101 Southbound Off-ramp to 7th Street (AM PH)
- Study Intersection J: I-10 Eastbound Off-ramp to Porter Street (AM PH)

The above three freeway off ramps were analyzed and US-101 southbound off/ramp to 7th street has significant safety impact as it projected to add more than two car lengths(50 feet) to a queue that is extending past the ramp capacity with speed differential more than 30 mph from the mainline freeway US-101. Therefore, it results into significant impact at this location.

When applying City's interim guidance, only Intersection H is impacted. We concur that "the Project applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the US-101 Southbound Off-ramp & 7th Street. This would require complying with the Caltrans project development process as a local agency-sponsored

project.” Additional mitigation for the City’s considering would be improving ramp storage such as extending left turns and right turn pocket and striping for additional demand due to the project trips.

Caltrans concurs that 2 intersections meet signal warrants regardless of the Project volumes and are considered to be cumulatively impacted by Project trips:

- Intersection I: E 8th Street & I-10 Westbound Ramp
- Intersection J: I-10 Eastbound Ramps & Porter Street

The project should contribute a fair-share contribution (installation of signals) between 9% to 11% per Table 23 and 24 of the 670 Mesquit Transportation Assessment Draft prepare in April 2021. Caltrans recommends that both proposed signals be synchronized with the existing signals that are currently at 8th St./Santa Fe Ave. and Porter St./Santa Fe Ave. especially during AM and PM peak so that cars on the offramp are flushed and not queuing back onto the mainline which may increase rear end/sideswipe type accidents.

Others

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

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.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2017-03813AL-DEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse