

APPENDIX D
LADOT Correspondence

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July 15, 2020

Tom Gaul
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Fehr & Peers

TRANSPORTATION ASSESSMENT FOR THE HOLLYWOOD CENTER PROJECT (CASE #CEN17-47441)

Dear Mr. Gaul,

During the public comment period for the Hollywood Center Project DEIR, it was brought to my attention that some commenters questioned the use of the Critical Movement Analysis (CMA) methodology in the project's transportation evaluation. The purpose of this letter is to verify that LADOT allowed the use of CMA for the project's non-CEQA related analysis to evaluate access and operational concerns.

To provide some background, on July 30, 2019, the Los Angeles City Council adopted new CEQA thresholds and transportation study guidelines to comply with Senate Bill 743, which requires State agencies to update their transportation impact thresholds to measure VMT as the CEQA transportation metric instead of level of service (LOS). The new LADOT Transportation Assessment Guidelines (TAG) identify the steps needed to complete a VMT-based analysis for CEQA purposes, and additional local analyses requirements to address safety, access, and circulation considerations outside of the CEQA process. To address operational concerns, the new guidelines require analysis using Highway Capacity Manual-based software for intersections adjacent to the project.

However, for projects that had begun their data collection efforts and operational analyses prior to the City Council adoption of the new VMT-based guidelines, LADOT allowed the use of CMA instead of the Highway Capacity Manual. The transition period from decades-old guidelines measuring LOS to now measuring VMT presented challenges for projects that were already working on LOS-based studies when the City Council adopted the new guidelines. Therefore, as long as projects include a VMT analysis, LADOT allowed for a grace period and permitted projects caught up in this transition to use CMA as their methodology to measure operational concerns.

It should be noted that projects that submitted project applications after the City Council's adoption date of July 30, 2019, and had not begun their transportation study scoping process with LADOT, are subject to all of the provisions of the TAG – including use of HCM-based methodologies. Please call me if you have questions.

Sincerely,

Tomas Carranza, Principal Transportation Engineer
Department of Transportation

