

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
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**Governor's Office of Planning & Research****February 23, 2021****STATE CLEARINGHOUSE**

February 23, 2021

Rey Fukuda  
City of Los Angeles  
Department of City Planning, Major Projects  
221 N. Figueroa Street, Suite 1350  
Los Angeles, CA 90012

RE: 1360 N. Vine Street – Response to  
Comments under CEQA (RTC)  
SCH # 2017061063  
GTS # 07-LA-2017-03487  
Vic. LA-2/PM: 11.594

Dear Rey Fukuda:

Thank you for sending the California Department of Transportation (Caltrans) the above referenced RTC. The subject of the RTC is a project that includes the construction of up to 429 new residential units, including 15-live work units and 16 units designated for very low-income households, a 55,000 square foot (sf) grocery store, approximately 5,000 sf of neighborhood-serving commercial retail uses, and up to 8,988 sf of restaurant uses. In addition, the project would provide a minimum of 677 vehicular spaces and a total of 532 bicycle parking spaces. Also, an additional 19 units designated for Very Low Income households would be developed offsite at a to be determined location. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 4,000 feet away from the US-101 ramps at Sunset Boulevard and approximately 1.25 miles away from the US-101 and State Route 2 (also known as Santa Monica Boulevard) interchange.

As discussed in the RTC, which is attached, Caltrans commented on the Notice of Preparation (NOP) for this project in July 2017. Since then, Senate Bill 743 (2013) has taken effect, which mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA starting July 1, 2020. Therefore, Caltrans welcomes the opportunity to provide new comments on the NOP in terms of VMT, as requested by the City in the attached RTC.

We look forward to reviewing the VMT analysis for this project in the forthcoming DEIR. For information on determining transportation impacts in terms of VMT on the State Highway System, see the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf). The City can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Note that Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory. As discussed in Caltrans' new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR's Technical Advisory.

Caltrans' updated TISG also states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues." Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated December 2020 and found here, for the City's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>. Caltrans encourages lead agencies to complete traffic safety impact analysis 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.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the TDM strategies this project has incorporated, such as being located within a Transit Priority Area and providing bicycle parking spaces. To further reduce this project's VMT impact, the City may want to consider ensuring that no more parking than required is provided. This strategy is particularly important for this project, because as mentioned in OPR's Technical Advisory, if a project in a Transit Priority Area includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction, a presumption of less than significant VMT impact might not be appropriate. In short, rather than providing a minimum of 677 vehicular spaces, the project may want to provide a maximum of 677 vehicular spaces.

Finally, 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 recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit the Construction Traffic Management Plan detailing these issues for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2017-03487.

Sincerely,



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

Attachment 1: Response to Comments Letter from City of Los Angeles titled "Re: 1360 N. Vine Street."

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CITY PLANNING**

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February 1, 2021

Ms. Miya Edmonson  
Department of Transportation  
District 7 – Office of Transportation Planning  
100 S. Main Street, MS 16  
Los Angeles, CA 90012

Re: 1360 N. Vine Street

Dear Ms. Miya Edmonson:

The Department of City Planning received Caltrans comment letter dated July 18, 2017 in response to the 1360 N. Vine Street (Project) Notice of Preparation of an Environmental Impact Report (EIR) and Public Scoping Meeting. To summarize, the letter provides recommendations for the Project's Draft EIR traffic analysis focusing on intersections to analyze, anticipated AM and PM peak-hour volumes, Level of Service (LOS) before and during construction, and a discussion of traffic to show turning and directional flow, and mitigation measures to alleviate anticipated traffic impacts.

On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and recent changes to Section 15064.3 of the CEQA Guidelines. Over the last five years, the City of Los Angeles Departments of City Planning and Transportation led efforts to facilitate the City's transition to VMT, to prepare new Transportation Assessment Guidelines (TAG) that address these changes, and to revise the Transportation Section to the City's CEQA Threshold Guide. The intent of SB 743 and subsequent changes to CEQA is to appropriately balance the needs of congestion management with statewide goals related to: the reduction of greenhouse gas emissions, infill development, and the promotion of public health through active transportation.

In light of the fact that the Caltrans letter, dated July 18, 2017 predated the changes in criteria used to determine transportation impacts, the Department of City Planning would like to provide you with an opportunity to provide updated comments based on the adopted VMT criterion. Please respond to this letter within 30 days of the date of this letter, or by March 3, 2021.

Sincerely,

Milena Zasadzien  
Senior City Planner  
Major Projects  
Department of City Planning