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April 20, 2022

Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

Erin Strellich
City of Los Angeles
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: The Morrison Hotel Project
SCH # 2019049078
Vic. LA-110/PM 21.77, LA-10/PM 15.31
GTS # LA-2019-03884-DEIR

Dear Erin Strellich:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The Project Site is currently occupied by the vacant Morrison Hotel, three commercial industrial buildings, and a surface parking lot. The Project would demolish the existing commercial industrial buildings (approximately 32,550 square feet) and surface parking lot. The existing 46,626-square-foot, 111-unit single-resident occupancy Morrison Hotel (Existing Hotel) would be partially rehabilitated, partially demolished and reconstructed, and expanded on the east side by approximately 174,481 square feet (Hotel Expansion). The Project would also construct an approximately 186,155-square-foot, hotel/residential building (Hotel/Residential Tower) to the north of the Existing Hotel. The rehabilitation of the Existing Hotel would include demolishing the approximately 12,280-square-foot inner wing to create a courtyard.

The Existing Hotel would be partially rehabilitated to provide 29,187 square feet of hotel uses and 5,155 square feet of ground floor restaurant uses. The Existing Hotel would be expanded with the Hotel Expansion, which would provide 165,800 square feet of hotel uses, a 2,838-square-foot rooftop restaurant and bar, and a 5,843-square-foot museum. The Hotel/Residential Tower would include 150,366 square feet of residential uses above 32,997 square feet of hotel uses and a 2,792-square-foot ground-floor restaurant. The total floor area of the Project would be approximately 420,303 square feet, for a Floor Area Ratio (FAR) of 7.5:1, with 136 dwelling units and 444 guest rooms. The Project includes 233 parking spaces to be located within three subterranean levels, excavated to a maximum depth of approximately 36 feet below the existing ground surface.

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, all future developments 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.

For this project, 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 any 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>

Transit

The City's downtown area offers multiple public transportation opportunities in the Project vicinity. Public transportation in the study area is provided by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT's Dash service (DASH LDD & LDF) and Commuter Express Service (CE), Santa Monica Big Blue Bus (BBB), Orange County Transportation Authority (OC), Metro Rail, and Metro Rapid. The Pico Metro Station is located along Flower Street north of Pico Boulevard approximately 600 feet walking distance from the Project Site.

Pedestrian and Bike

The sidewalks along the Project frontages provide connectivity to pedestrian crossings at the intersections of Hope Street/12th Street and Hope Street/Pico Boulevard. These intersections are signalized and provide crosswalk striping and Americans with Disabilities Act wheelchair ramps. Both Hope Street and Pico Boulevard are included in the Pedestrian Enhanced District. No bike facilities, including bike paths, bike lanes, or bike routes, are currently located along the Project frontage of Hope Street or Pico Boulevard; however, Pico Boulevard is identified as a potential future Tier 3 bike facility.

VMT

Results of the Project's VMT calculation show a daily Household VMT per capita value of 3.5 (below the Central APC area threshold value of 6.0), and Work VMT of 6.7 (below the Central APC area threshold value of 7.6). Based on the above VMT analysis, the Project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Therefore, the Project's VMT impacts would be less than significant.

Given the above finding of less than significant Project VMT impact, the identification of mitigation measures is not required at this time. However, a post-development VMT analysis with all mitigation measures should be prepared for monitoring purpose and for future project thresholds in the area. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

State Facility Evaluation

The proposed Project is immediately east of the Harbor Freeway (I-110) and north of the Santa Monica Freeway (I-10). The Project generates fewer than 25 Project trips in which will be utilizing the nearby off ramps during the peak hours. Therefore, per City's Interim

Guidance for Freeway Safety Analysis, no further analysis and no deficiencies have been identified at the off ramps.

Other

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-2019-03884-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse