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June 10, 2019

Ms. Polonia Majas
Major Projects Section
Department of City Planning
City of Los Angeles
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: 8th, Grand and Hope Project
Vic. LA-110/PM 22.46,
LA-101/PM 1.14
LA-10/PM 15.2
SCH # 2019050010
GTS # LA-2017-02467AL/K-NOP

Dear Ms. Majas:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes to demolish an existing surface parking lot and four-level parking structure in order to develop a 45-story mixed-use building consisting of 547 residential dwelling units, up to 7,499 square feet of ground floor commercial/retail restaurant space, and a 37,216 square-foot charter school for grades K-5. The Project would provide a maximum of 562,696 square feet. The Project includes an option wherein an additional 33 residential units may be constructed in lieu of the school use, resulting in a total of 580 residential units. Under this scenario, a maximum of 556,459 square feet of floor area would be developed.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. 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. As a reminder, the VMT will be the standard transportation analysis metric in CEQA for land use projects starting July 1, 2020 statewide implementation date. You may reference to The Governor's Office of Planning and Research (OPR) for more information.

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

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 development 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.

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

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

A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

We have the following preliminary comments after reviewing the NOP:

1. The EIR should include a Transportation Impact Study (TIS) to ensure all modes of transportation are served well by planning and development activities. This includes but not limit to reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions, etc.

2. The following advisory should be used for project study and analysis:

   Technical Advisory on Evaluating Transportation Impacts in CEQA by Governor's Office of Planning and Research, dated December 2018.
   http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

3. The scope of Transportation Impact Study should include the following Traffic Analysis Scenarios:
    a) Existing Conditions – Current year traffic volumes and peak hour volume/analysis of effected State highway facilities.
    b) Proposed Project Only – Trip generation, distribution, and assignment in the year of project is anticipated to complete construction.
    c) Cumulative Conditions (Existing Conditions Plus Other Approved and Pending Projects Without Proposed Project) – Trip assignment and peak hour volume/analysis in the year the project is anticipated to complete construction.
    d) Cumulative Conditions Plus Proposed Project (Existing Conditions Plus Other Approved and Pending Projects Plus Proposed Project) – Trip assignment and peak hour volume/analysis in the year the project is anticipated to complete construction.
    e) Cumulative Conditions Plus Proposed Phases (Interim Years) – Trip assignment and peak hour volume/analysis in the years project phases are anticipated to complete constructions.

4. The HCM methodology should be used for analysis on State Highway Systems if the Level of Service (LOS) methodology is still in used. For freeway mainline, weave, merge and diverge segments, the methodologies in Chapter 12, 13, 14 of the HCM 6th edition are limited to under saturated flow conditions. When a freeway facility has oversaturated flows, Chapter 10, Freeway Facilities Core Methodology, is recommended to be used to determine a more precise density for such conditions. It is acknowledged there are limitations of the HCM methodology and thus its recommended to use a traffic simulation model for the analysis.

5. Potential traffic conflict analysis should include on and off-ramps, affected intersections (left- and/or right-turn queue), acceleration and deceleration lanes, and weaving areas in the project vicinity. The TIS should include the following potential traffic conflict analysis on state facilities within the study Area, such as Interstate-110 (I-110). We suggest the following ramps contain a TIS Report:
    - I-110 Northbound Off-ramp to 9th Street
    - I-110 Southbound Off-ramp to 9th Street
    - I-110 Southbound Off-ramp to 6th Street/Wilshire Blvd
    - I-110 Northbound On-ramp from 8th Street
    - I-110 Southbound On-ramp from 8th Street

These analyses should include:

- Queuing analysis where there is inadequate queue length at intersections, turn lanes, freeway ramps, diverge or ramp terminal intersections.
- Inadequate weaving distance/deceleration length with increasing traffic volumes

6. Caltrans requests information regarding the assignment of direct and cumulative trips to state facilities in the project vicinity.
   - This project may result in a potential adverse impact to State Route 101 (SR-101). Accordingly, direct and cumulative impacts should be studied for on and off-ramps in the vicinity between Alameda Street and Route 2 NE. These studies should also include queuing analysis for the off-ramps and connectors at the SR-101 and I-110 four-level interchange
     - Caltrans is amenable to discussion regarding potential analysis and mitigation regarding these direct and cumulative impacts.

7. The project proponent may use a 95 percentile to obtain queue length.

8. To calculate the baseline condition for total queue length on off-ramps, measure the distance from the intersection to the gore point. Caltrans recommends that any queuing on an off-ramp attributable to the project beyond 85% of this total length be considered a significant impact for direct or cumulative impacts.

9. When an auxiliary lane is present, impacts will be considered significant, either directly or cumulatively, when sufficient traffic volume generated by the project that would create a potential traffic conflict.

10. If Synchro software is used to calculate queue length for the ramp terminal signalized intersection, then actual signal timing must be used, not signal optimization timing.

11. The analysis should use a local truck factor and 25 feet per passenger car.

12. If an impact is identified, Caltrans recommends consideration of the following potential traffic conflict improvement measures:
    - Safety sign/Yield Sign, delineation
    - Pavement markings
    - ADA ramps, pedestrian sidewalk

- Ramp metering
- Intersection control
- Ramp/lane widening. While ramp or lane widening is a potential improvement measure, this measure should be considered as a last resort after first considering measures (a) through (e) above.
- Please note that the above is a non-exclusive list of potential improvement measures. The project proponent should consider additional feasible measures.

13. The project proponent may pay 100% of the direct impact and/or fair-share contribution (i.e., a fee program) with cumulative impacts.

A scoping meeting is recommended if consultation is needed for study locations, methodology, and significant threshold on the State facilities. If you have any questions, please feel free to contact Mr. Carlo Ramirez at (213) 897-6536 and refer to GTS # LA-2017-02467-NOP.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse