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January 10, 2024

James Harris, City Planner
Department of City Planning
City of Los Angeles
221 N. Figueroa St., Room 1350
Los Angeles, CA 90212

RE: Hilton Universal City Project
SCH # 2020100057
Vic. LA-101/PM 9.66 to 10.35
GTS # LA-2020-04377-DEIR

Dear James Harris:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Hilton Universal City Project (Project) involves the construction of an approximately 300,000 square-foot, 18-story Hotel Expansion Building in addition to the existing 24-story Hilton Universal City Hotel. The Hotel Expansion Building would be comprised of 395 guestrooms, a spa, restaurant, indoor/outdoor bar, two pools, a single-level lobby connecting to the existing hotel building, a meeting room addition to the ancillary building, and a three-level expansion of the existing subterranean parking garage. Upon completion of the Project, the Hilton Universal City Project would provide 890 guestrooms and 697,521 square feet of floor area.

Caltrans is aware of the 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.

**Mobility Plan**
Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or programs in Mobility Plan 2035 adopted to protect the environment and reduce VMT.

**Sherman Oak-Studio City-Toluca Lake-Cahuenga Pass Community Plan**
The evaluation of the Project's consistency with the applicable policies and programs of the Community Plan involves determining whether there is any conflict. The analysis reveals that the Project aligns with all relevant policies and programs outlined in the Community Plan, indicating no conflicts.

**Additional Policies and Programs**

a. LADOT Manual of Policies and Procedures
b. Vision Zero
c. Plan for a Healthy Los Angeles
d. Citywide Design Guidelines
e. Mobility Hubs Reader's Guide
f. Walkability Checklist

Overall, The Project is in alignment with programs, plans, ordinances, or policies related to the circulation system, encompassing transit, roadways, bicycle, and pedestrian facilities. These have been established to enhance mobility by providing alternatives to single-passenger vehicles and reducing vehicle miles traveled (VMT). Consequently, the Project's impacts are anticipated to be less than significant.

**Transit**
The Project Site is located within a Transit Priority Area and is currently served by many local lines and regional/commuter lines via stops located within convenient walking distance along Universal Hollywood Drive and Lankershim Boulevard. The transit lines include: Metro Local Lines 150/240, 155, 224, and 237, Metro Rapid Line 750, the Metro B Line (Red), and the Burbank Bus Pink Route.

**Pedestrian and Bicycle Project Site Access**
Pedestrian access to the Project Site will continue to be provided via Universal Hollywood Drive. The north side of the existing driveway is improved with sidewalks, and the outbound driveway approach at Universal Hollywood Drive is improved with a striped crosswalk and American with Disabilities Act (ADA) access ramps with yellow truncated

domes. A pedestrian path along the south side from the Project Site to the sidewalk along the Project Site's Universal Hollywood Drive frontage has been identified as a potential off-site improvement. Bicycle access to the Project Site will continue to be provided via Universal Hollywood Drive. The Project will provide 118 bicycle parking on-site for hotel guests, visitors, and employees of the Project.

**VMT**

The Project would generate 8.8 daily work VMT per employee, which is below the threshold of significance for the South Valley APC of 11.6 daily work VMT per employee. It should be noted that the Project would incorporate Project Design Feature TRAF-PDF-1 (TDM Program), which includes TDM strategies. A TDM Program can be considered as a Project Design Feature if no VMT impact would result without consideration of the associated TDM strategies. Accordingly, without consideration of the TDM strategies, the Project would generate a total of 4,902 daily vehicle trips and generate 10.0 daily work VMT per employee, which would still be below the threshold of significance for the South Valley APC of 11.6 daily work VMT per employee.

The project's quality restaurant, high-turnover restaurant, bar/lounge, and spa components, which total 25,397 square feet of floor area, are considered local serving retail uses. As the Project's local-serving retail uses total less than 50,000 square feet, a no-impact determination can be made as it relates to VMT for these uses.

The proposed Project may demonstrate not significantly contribute to visitor/guest trips when located closer to commonly frequented destinations for guests and visitors compared to other existing hotels. This positioning can result in shorter overall visitor trips compared to what would be expected without the Project. Specifically, the Project will build 395 guestrooms across Universal Hollywood Drive from Universal Studios Hollywood and Universal CityWalk. The Existing Hotel Building stands as the nearest hotel to the main entrance of Universal Studios Hollywood and Universal CityWalk, with the Sheraton Universal being the only other hotel in close proximity to these destinations, adjoining the Project Site to the west.

Given the Project's proximity to Universal Studios Hollywood and Universal CityWalk, it is plausible that many hotel visitors/guests would opt for walking between these destinations and the Project Site. These walking trips could potentially replace existing vehicle trips to these destinations by visitors staying at off-site hotels. Furthermore, the Existing Hotel Building already offers a shuttle service for transporting visitors and guests to and from Universal Studios Hollywood and Universal CityWalk, a service that would be extended to future visitors and guests of the Project, thereby further reducing vehicle trips. Moreover, the Project is designed to provide 118 bicycle parking facilities for visitors and guests, in accordance with the requirements of the Los Angeles Municipal Code (LAMC).

Considering the Project's provision of 395 additional guestrooms in close proximity to Universal Studios Hollywood and Universal CityWalk, its shuttle service, and the inclusion

of bicycle parking amenities, it can be concluded that the Project would not contribute to significant visitor/guest trips. Therefore, the associated Vehicle Miles Traveled (VMT) impacts are anticipated to be less than significant.

**TRAF-PDF-1: Transportation Demand Management Program (TDM)**

The applicant will implement a TDM Program for the Hotel Expansion Building and Meeting Room Addition aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The Existing Hotel Building currently implements these four strategies and will continue to do so upon completion of the Project. The strategies in the TDM Program will include:

a. Transit Subsidies-Caltrans recommends long-term subsidies.
b. Promotions and Marketing
c. Include Bicycle Parking: The Project will provide 54 short-term and 64 long-term bicycle parking spaces.
d. Include Secure Bicycle Parking and Showers

The Project Design Feature TRAF-PDF-1, involving a Transportation Demand Management (TDM) Program, leads to a noteworthy 19.5 percent reduction in both overall Vehicle Miles Traveled (VMT) and associated pollutant emissions. We concur that the applicant is adding electric vehicle charging stations to promote energy-efficient transportation.

In addition to the proposed TDM, 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). This reference is available online at:

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

**TRAF-PDF-2: Construction Management Plan.**

Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, traffic management strategies, detour plans, haul routes and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will ensure access will remain unobstructed for land uses in proximity to the Project Site during Project construction and will require coordination with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences.

**Freeway Safety Analysis**
The Project would add 29 trips to the US-101 Southbound Off-Ramp at Lankershim Boulevard during the weekday PM peak hour. The Project would not add 25 trips during the weekday AM and PM peak hours at other freeway off-ramps in the immediate vicinity of the Project Site.

The change in queue length associated with the Project at the US-101 Freeway Southbound Off-Ramp right-turn approach under Future Cumulative with Project conditions increases by approximately 27 feet (i.e., just over one vehicle length) during the weekday PM peak hour. This extension in queue length can be accommodated by the existing off-ramp and the vehicle queue would not extend onto the mainline. The change in queue length at the US-101 Freeway Southbound Off Ramp right-turn approach would be less than the City's threshold of two vehicles, the Project would cause a less than significant freeway safety impact. There is no change in queue length associated with the Project's PM peak hour trips at the US-101 Freeway Southbound Off-Ramp's left-turn and through approaches. Therefore, the Project would cause a less-than-significant freeway safety impact.

On Table 4-2 Freeway Off-Ramp Queue Evaluation US-101 Freeway Southbound off-ramp at Lankershim Boulevard Weekday PM Peak Hour of the Appendix K Transportation Assessment, this analysis should disclose existing condition queuing length and existing condition plus project condition for the off-ramp from the stop bar to the gore point to demonstrate the project traffic would not exceed the ramp storage to mainline. Additionally, a footnote should be incorporated into the table to specify that the existing condition data utilizes actual signal timing, which is obtained from either Caltrans or LADOT traffic data. This footnote is essential to provide clarity and transparency regarding the source of information used for the existing condition analysis.

**Potential Corrective Measures on Caltrans' Right-Of-Way**
Universal Studios Boulevard functions as a private street at the freeway on-ramp. The southbound Universal Studios Boulevard left-turn approach is expected to experience an increase in queue length, extending to approximately four car lengths during the PM Peak Hour due to the project. To address this, the proposed improvement involves adjusting the traffic signal timing plan to allocate additional green time specifically for the southbound Universal Studios Boulevard left-turn approach. It's important to note that this intersection falls under the jurisdiction of Caltrans, and any modifications or improvements to this intersection are subject to thorough review and approval by Caltrans.

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 standards and specifications.

**Others**

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods. Any debris on the construction truck must be covered by a tarpaulin cover.

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-2020-04377-DEIR.

Sincerely,

*Frances Duong*

FRANCES DUONG
Acting LDR/CEQA Branch Chief

email: State Clearinghouse