

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research**Jan 25 2021**

January 25, 2021

STATE CLEARINGHOUSE

Masa Alkire, AICP
City of Beverly Hills
Community Development Department
455 North Rexford Drive
Beverly Hills, CA 90210

RE: Beverly Hills Creative Offices Specific Plan
Project – Notice of Preparation of an
Environmental Impact Report (NOP)
SCH # 2021010164
GTS # 07-LA-2021-03479
Vic. LA-10/PM: R8.645

Dear Masa Alkire:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project would involve construction and operation of up to 11 new office buildings in the City of Beverly Hills. The buildings would range between approximately 8,500 and 21,700 square feet in size and 3 to 4 stories in height. They would be constructed within an approximately 2.49-acre site, which consists of a 2.11-acre private property bound by Santa Monica Boulevard to the northwest, Beverly Boulevard to the northeast, and Civic Center Drive to the southeast and southwest, along with approximately 0.37 acres of public right-of-way surface area proposed to be vacated by the City and incorporated into the Project Site. In addition, the Project Site includes a subsurface area under existing public right-of-way that the applicant proposes the City to vacate. This proposed vacation is for the construction of a two-level subterranean parking structure. The City of Beverly Hills is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 4 miles away from the Interstate 405 and Santa Monica Boulevard interchange. From reviewing the NOP, Caltrans has the following comments:

- Senate Bill 743 (2013) 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. 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.
- 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>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.
- Caltrans looks forward to reviewing the VMT analysis for this project. 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.

- The updated TISG 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, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. For TDM options to further reduce this project's VMT impact, please see:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

Also, 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 delays on any State facilities, please submit a construction traffic control plan detailing these delays for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2021-03479.

Sincerely,



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