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August 10, 2023

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

RE: Violet Street Office Campus Project – Draft
 Environmental Impact Report (DEIR)
 SCH# 2021110015
 GTS# 07-LA-2021-04263
 Vic. LA-101 PM S0.085
 LA-10 PM 17.702
 LA-10 PM 17.604

Dear Rey Fukuda:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Violet Street Creative Office Campus Project (Project) is a new creative office campus with uses spanning existing and proposed buildings on an approximately 6.3-acre site. Construction of the Project would require the demolition of the existing warehouse uses, office uses, and associated surface parking located on the southwest portion of the Project Site. The remainder of the Project Site is developed with the existing Warner Music Group building and a five-story parking garage, which would be retained as part of the Project. The Project proposes a 13-story building featuring office uses, ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces located in a seven-story parking garage, comprised of one at-grade, two above-grade, and four below-grade levels. Approximately 74,018 square feet of outdoor areas would be provided. The Applicant is requesting a General Plan Amendment to designate a portion of the Project Site's land use from Heavy Manufacturing to Regional Center Commercial and a Vesting Zone Change from the M3-1-RIO zone to C2-2-RIO zone. If approved, the Project's maximum floor area ratio (FAR) would be 6:1, permitting 661,800 square feet of development. The Project also includes a Future Campus Expansion Phase which encompasses a potential expansion opportunity for additional office use to be developed within the Project Site at the corner of Violet Street and Santa Fe Avenue. Construction of the Future Campus Expansion Phase would require the demolition of an existing 21,880-square-foot building containing office uses. For purposes of this analysis, this Future Campus Expansion Phase would be comprised of office and restaurant uses, but this portion of the Project Site could be utilized for any uses consistent with the existing M3-1-RIO zone.

The nearest State facilities to the proposed project are US 101 and I-10. After reviewing the DEIR, Caltrans has the following comments:

As stated in section 3.2 of the Transportation Assessment (Appendix M) of the DEIR, the Project will not result in a significant VMT impact. However, section 3.4 covers the conducted Freeway Safety Analysis and identifies impacts and mitigations at the following locations:

US-101 Southbound Off-ramp & 7th Street

The queue on the US-101 Southbound Off-ramp to 7th Street is projected to add six car lengths to the queue in the AM peak hour. The PeMS data showed that the average mainline speed on the US-101 South near the 7th Street off-ramp during the AM peak hour is approximately 57 mph. Assuming the traffic queued on the ramp is traveling at zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue during the AM peak hour at the US-101 Southbound Off-ramp to 7th Street.

The following mitigation measure was identified:

- The Project applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the US-101 Southbound Off-ramp & 7th Street. This would require complying with the Caltrans project development process as a local agency-sponsored project.

I-10 Eastbound Off-ramp & Porter Street

The queue on the I-10 Eastbound Off-ramp to Porter Street is projected to add three car lengths to the queue in the AM peak hour. The PeMS data showed that the average mainline speed on the I-10 East near the Porter Street off-ramp during the AM peak hour is approximately 66 mph. Assuming the traffic queued on the ramp is traveling at zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue during the AM peak hour at the I-10 Eastbound Off-ramp to Porter Street.

The following mitigation measure was identified:

- The Project applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the I-10 Eastbound Off-ramp to Porter Street. This would require complying with the Caltrans project development process as a local agency-sponsored project. Given this intersection's proximity to other intersections, close signal coordination is recommended with nearby intersections.

I-10 Westbound Off-ramp & Mateo Street/Enterprise Street

The queue on the I-10 Westbound Off-ramp to Mateo Street/Enterprise Street is projected to add five car lengths to the queue in the AM peak hour. The PeMS data showed that the average mainline speed on the I-10 West near the Mateo Street/Enterprise Street off-ramp is approximately 54 mph during the AM peak hour. Assuming the traffic queued on the ramp is

traveling at zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue at I-10 Westbound Off-ramp to Mateo Street/Enterprise Street.

The following mitigation measure was identified:

- The Project applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the I-10 Westbound Off-ramp to Mateo Street/Enterprise Street. This would require complying with the Caltrans project development process as a local agency-sponsored project.

Caltrans concurs with the proposed mitigations to signalize the identified impacted locations so long as the designs meet all applicable standards and actively improve safety for all modes. Some additional recommendations are:

- Where possible, form a square 4-leg intersection. Slip lanes cause excessive vehicle speeds and increase pedestrian crossing distance.
- Additional analysis may be justified at the Northbound Route 5 off-ramp to Westbound 7th Street, due to it being approximately 250 feet from the Southbound Route 101 off-ramp to 7th Street.
- Implementing Leading Pedestrian Intervals (LPIs) and curb extensions at as many intersection locations as possible, to improve pedestrian visibility and reduce overall crossing distance.

Since these projects will be sponsored and lead by the local agency (City of Los Angeles) they will primarily be working with Caltrans District 7's Office of Permits once the permit application is complete. Before the Lead Agency develops the permit application package, please be aware of the following requirements and recommendations:

- Conduct a signal warrants analysis for all proposed intersections. Note: that the design at this intersection should also enhance pedestrian crossing safety to the greatest extent possible.
- All new or reconstructed sidewalk should meet or exceed all the latest state standards.
- The Project will result in new transportation infrastructure and these changes should always aim to create a comprehensive, integrated, connected network that is safe to use for all modes.

Please also be aware that the Project would be responsible for payment of applicable fees and Caltrans is not responsible for any fair-share contribution to the changes or improvements proposed or required by the Lead Agency.

Caltrans also requests that a traffic control plan or Construction Traffic Management Plan (CTMP) be provided to Caltrans. The following elements shall be implemented, as appropriate:

- Construction traffic routes shall avoid residential areas. This would ensure travel in the surrounding residential neighborhoods is minimized and that construction vehicles travel

along arterial roadways to access the Project site rather than through the neighborhoods or along pedestrian routes.

- Schedule construction activities to reduce the effects on traffic flows on surrounding arterial streets during peak hours.
- Obtain the required permits for truck haul routes from the City prior to issuance of any permit for the project.
- The project contractor shall identify and enforce truck haul routes deemed acceptable by the City for construction trucks.
- Signs shall be posted along roads identifying construction traffic access or flow limitations due to single lane conditions during periods of truck traffic, if needed.
- Accommodate all equipment and worker parking on-site to the extent feasible.
- Advance notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.
- Provide for temporary traffic control during all construction activities adjacent to the public right-of-way to improve traffic flow on public roadways (e.g., flag men).
- Any work that would affect the freeways and its facilities, Caltrans has the jurisdiction for review and approval.

Finally, an encroachment permit will be required for any project work proposed on or in the vicinity of Caltrans right-of-way and all concerns must be adequately addressed.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2021-04263.

Sincerely,



MIYA EDMONSON
LDR Branch Chief

cc: State Clearinghouse