

DEPARTMENT OF TRANSPORTATION

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a California Way of Life*

September 29, 2022

Antonio Castillo, Senior Planner
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City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216



RE: 8228-8240 Sunset, The Harper Project
SCH # 2022090073
Vic. LA-101/PM 6.52, LA-02/PM 10.62
GTS # LA-2022-04056-NOP

Dear Antonio Castillo:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The project proposes to remove existing on-site uses and develop a mixed-use hotel, commercial and residential structure with subterranean parking, including 167 hotel rooms, 45 residential units, restaurants, retail, commercial uses, and other ancillary hotel and residential amenities.

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:

<https://opr.ca.gov/ceqa/#guidelines-updates>

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, 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. 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.

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://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>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review the SB 743 Implementation Resource at the following link:

<https://dot.ca.gov/programs/sustainability/sb-743/sb743-resources>

The Project proposes to remove existing on-site office uses and develop a mixed-use hotel, restaurant, retail, and residential project. The Project would generate additional pedestrian, public transit, and vehicle trips beyond existing conditions. Trips generated as a result of the proposed Project have the potential to conflict with programs, plans,

ordinances, or policies addressing the circulation system. An analysis will be prepared to analyze potential conflicts with applicable plans and policies addressing the circulation system. An analysis will be prepared to determine if the proposed Project would be conflict or be inconsistent with CEQA Guidelines Section 15064.3 and the City's adopted VMT guidance. Therefore, these issues will be further analyzed in the EIR.

Caltrans encourages lead agencies to prepare traffic safety impact analysis for this development in the California Environmental Quality Act (CEQA) review process using Caltrans guidelines above on the State facilities so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

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-2022-04056AL-NOP.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse