

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



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a California Way of Life*

June 12, 2023

Paul Caporaso
Department of City Planning
City of Los Angeles
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Wilshire and Cloverdale Project
SCH # 2023050401
Vic. LA-10/PM R10.86, LA-2/PM 10.62
GTS # LA-2023-04231-NOP

Dear Paul Caporaso:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The Project would construct a residential tower and podium comprised of up to 419 residential units, including 47 units for Extremely Low-Income households, and a 2,645-square-foot ground-floor restaurant. Existing commercial buildings along Wilshire Boulevard, including Los Angeles Historic-Cultural Monument (HCM) #451 which is limited to the façade of the Dark Room storefront, would be retained, and would provide 42,092 square feet of office and restaurant uses. Additionally, 6,137 square feet of existing commercial floor area would be removed. The Project would have a maximum building height of 46 stories and 530 feet and would include four levels of below-grade parking and five levels of above-grade parking. Upon completion, the Project would result in a total floor area of 420,201 square feet on a 58,257 net square foot site.

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 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, 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://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.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>

Potential environmental effects of the Project should include the Transportation section with VMT analysis in the Draft Environmental Impact Report. I-10 on/off-ramps at the Interchange of La Brea Avenue are the closest to the project site (2 miles north). For the

City's consideration to address this project's traffic safety concerns, Caltrans recommends the Lead Agency include queuing analysis with actual signal timing for existing traffic conditions and existing traffic conditions plus project trips at I-10 and potentially impacted off-ramps.

Trucks hauling materials to and from the State highway facility should avoid travel during peak hour congestion. In addition, truck hauling materials should have a tarp covering to avoid debris falling onto the State facilities. Also, we would like to be informed of any additional impacts to the State ramps during the construction phase.

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-2023-04231AL-NOP.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse