

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



*Making Conservation
a California Way of Life*

July 2, 2024

Michael Gatheru
Department of City Planning
City of Los Angeles
221 North Figueroa Street, Room 1350
Los Angeles, CAS 90012

RE: 130 College Project-ENV-2023-2307-EIR
SCH # 2024060069
Vic. LA-110/PM 24.45, LA-101/PM 0.77
LA-05/PM 19.21
GTS # LA-2024-04545-NOP-AL

Dear Michael Gatheru,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The Project proposes the removal of the existing surface parking lot, to construct a new five-story with one mezzanine parking level, 232,802 square-foot commercial development consisting of 224,597 square feet of office, 4,095 square feet of restaurants, and 4,110 square feet of retail on an approximately 2.2-acre site, resulting in a Floor Area Ratio (FAR) of 2.42:1. The Project would have a maximum height of 88 feet and includes parking in one subterranean level, one at-grade level, and one above-grade mezzanine level.

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, all developments in the General Plan should incorporate multi-modal and

complete street 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 on December 18, 2020. You can review those documents at the following link:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

The Transportation section of the Draft Environmental Impact Report should include a VMT analysis to determine if the project will create a significant VMT impact. To address potential transportation safety concerns, for the City's consideration, Caltrans recommends the Lead Agency include a queuing analysis (on the off-ramps to verify the added traffic generated from the project does not exceed the storage length of the ramp and at the intersections turning pockets/lanes) with actual signal timing for existing traffic

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conditions plus project net trips at the impacted off-ramps on Freeway 110, 101, and SB Freeway 5 off-ramp to North Broadway, NB Freeway 5 off-ramp to Main Street, and EB Freeway 10 off-ramp to East Cesar E. Chavez Avenue.

Caltrans encourages lead agencies to prepare transportation safety impact analysis for this Specific Plan 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-2024-04545-NOP-AL.

Sincerely,



ANTHONY HIGGINS

Acting LDR/CEQA Branch Chief

email: State Clearinghouse