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Subject: Caltrans DEIR Letter for Hollywood Center Project
Attachments: 2020-0529_LA-2018-03233-DEIR Comments_06012020.pdf

Dear Ms. Nguyen,

Attached, please find Caltrans comment letter. Let us know if the City has any question.

Thank you for the opportunity to review this project.

Sincerely,

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*Making Conservation
a California Way of Life.*

June 1, 2020

Ms. Mindy Nguyen
Major Projects Section
Department of City Planning
City of Los Angeles
221 N Figueroa St. Suite 1350
Los Angeles, CA 90012

RE: Hollywood Center Project
SCH# 2018051002
GTS # LA-2018-03233-DEIR-AL
Vic., LA-101, PM 7.16

Dear Ms. Nguyen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The Hollywood Center Project is a mixed-use development on an approximately 4.46-acre site (Project). The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site", and the portion located between Vine Street and Argyle Avenue is identified as the "East Site". The Project Site is currently developed with a single-story building and surface parking on the West Site; the East Site is currently developed with the Capitol Records Building and Gogerty Building, both occupied by Capital Records (the Capitol Records Complex), and surface parking.

As part of the Project, the existing building on the West Site would be demolished, and the Capitol Records Complex would be preserved. The remainder of the Project Site would be redeveloped with 1,005 residential units comprised of 872 market-rate and 133 senior affordable units, and up to 30,176 square feet of commercial uses within four new mixed-use buildings. Overall, the Project would contain up to 1,287,150 square feet of floor area.

The residential and commercial uses would be located within four new buildings: a 35-story building on the West Site (West Building); a 46-story building on the East Site (East Building); and two 11-story senior housing buildings, one on each site (West Senior Building and East Senior Building), set aside for Extremely Low and/or Very Low Income households.

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Under a proposed East Site Hotel Option, 104 residential units within the East Building would be replaced with a hotel. In total, the Project with the East Site Hotel Option would contain 884 residential units, comprised of 768 market-rate and 116 senior affordable units, a 220-room hotel with supporting amenities, and up to 30,176 square feet of commercial uses. Overall, the Project with the East Site Hotel Option would contain up to 1,272,741 square feet of floor area.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. CEQA Guidelines were adopted in December 2018, which implement SB 743's change to CEQA transportation analysis including use of a Vehicle Miles Traveled metric for land use projects. The CEQA Guidelines amendments are available at <https://resources.ca.gov/About-Us/Legal/CEQA-Supplemental-Documents>

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, future 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.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. We also 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.

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The Project Site is located in a dense area of Hollywood served by numerous public transit lines. Existing Transit Service shows the various transit lines providing service in the Project vicinity. The Metro Red Line, five local Metro bus routes (Route 180/181, 210, 212/312, 217, and 222), a Metro Rapid bus route (Route 780), and three LADOT DASH lines (Hollywood, Beachwood Canyon, and Hollywood/Wilshire) serve the area.

There are existing and planned designated bicycle facilities in the Project Area. Wilcox Avenue, Vine Street, Selma Avenue, Argyle Avenue, and Franklyn Avenue are designated as roadways intended to share the road with bicyclists and provide shared lane markings; these roads are also known as bicycle routes. Yucca Street is designated as a bicycle-friendly roadway. The Project would provide up to 551 bicycle parking spaces (or 554 bicycle spaces under the Project with the Project with East Site Hotel Option), as well as bike lockers and showers located in the subterranean bike parking areas in dedicated areas on the respective sites. A bicycle repair facility would also be provided on the Project Site as part of the amenities to increase access for bicycle users.

The Project has committed to implement numerous Transportation Demand Management (TDM) measures that are included as part of Project Design Feature TRAF-PDF-1. The TDM Program is aimed at discouraging single-occupancy vehicle trips and would collectively serve to reduce dependence on single-occupancy vehicles. The TDM Program encourages alternative modes of transportation, such as carpooling, taking transit, walking, and biking. As part of the TDM, the Project would support strategies to encourage public transit, such as providing unbundled parking, on-site locations to purchase Metro passes, transit subsidies, a commute trip reduction program; shared mobility features (i.e., bike and car share); bicycle friendly infrastructure, education and encouragement program on available transit option; and on-site management of TDM programs. These TDM measures would collectively serve to reduce VMT per capita. Caltrans requests that the Lead Agency incorporate these TDM measures into the Project and confirm that the implementation of these measures will be enforceable over time.

The Project provides a sustainable transportation system that promotes environmental and public health. The Project's mix of uses would allow residents, employees, and visitors to make transportation choices that are more environmentally sustainable and promote public health by providing convenient access to walking, biking, and transit options in and around the Project Site. A pedestrian paseo and a proposed signalized crossing across Argyle Avenue are intended to facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. These improvements would improve first/last mile access to nearby transit, including the Metro Red Line.

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The Project would encourage the use of electric vehicles by providing parking spaces capable of supporting electric vehicle supply equipment as required in Project Design Feature GHG-PDF-1 for minimum of 30 percent of the provided parking spaces, with 10 percent of the provided spaces further improved with electric vehicle charging station. As such, the Project would support the use of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

As a result of the project design, the Project would generate 4.8 household VMT per capita for Project Household and Work VMT. The Project with the East Site Hotel Option would generate 4.7 household VMT per capita. Both options are below the threshold of significance of the Central APC of 6.0 household VMT per capita. Therefore, the Project would result in less than significant VMT impacts. Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or program in Mobility Plan 2035 adopted to protect the environmental and reduce VMT.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

Finally, the City provided a supplemental traffic analysis as Appendix N to respond to Caltrans' safety concerns to the transportation system. In reviewing this appendix, we are not satisfied that our concerns have been addressed. As such, we would like to meet with the City to discuss the details of our concerns and work toward a mutually agreeable resolution. Any improvements or modifications to the State Highway system that result from our discussion should be included as conditions of approval of the Project by the City.

Please feel free to contact Miya Edmonson at (213) 897-6536 if you have any questions regarding the above. We look forward to working with you.

Sincerely,



PAUL ALBERT MARQUEZ
Deputy District Director, Planning, Goods Movement and Local Assistance

cc: Scott Morgan, State Clearinghouse