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*Making Conservation  
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Governor's Office of Planning &amp; Research

May 31, 2019

STATE CLEARINGHOUSE

May 30, 2019

Ms. Kathleen King  
Major Projects Section  
City of Los Angeles  
221 N. Figueroa Street, Room 1350  
Los Angeles, CA 90012

RE: Modera Argyle  
Vic. LA-101/PM 6.524-7.22  
SCH # 2017081039  
GTS # LA-2017-02420-DEIR

Dear Ms. King:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes to develop a new mixed-use project on a 1.1-acre site located within the Hollywood community of the City of Los Angeles. The Project includes 276 residential units, up to 24,000 square feet of neighborhood-serving commercial retail and restaurant uses, and up to 412 vehicle parking spaces. Alternatively, up to 27,000 square-foot grocery store could be constructed in lieu of the proposed retail and restaurant uses.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) 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. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

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.

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). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts is needed. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

After reviewing the Draft Environmental Impact Report (DEIR) and Transportation Impact Study (TIS) date in March 2018 for this project, Caltrans has the following comments:

1. On page 8 of TIS, "Caltrans facilities were evaluated according to the requirements of the Caltrans Agreement which identifies a series of screening criteria that, if any are met by the Project, require a more detailed analysis of Caltrans facilities." On Appendix A of the TIS, Memorandum of Understanding, the memo was signed in June 2017 and the Notice of Preparation is prepared on August 18, 2017. However, the agreement between Caltrans and LADOT expired in December 2016. As a reminder, please do not use the agreement for any future TIS. Instead, Caltrans consultation for future methodology, study locations, and significant threshold is recommended.

2. On page 65 of TIS, Table 8 (Trip Generation) stated that the project would generate a net of 2,013 new project daily trips and 170/179 AM/PM peak hour trips. Table 14 (Trip Generation-Supermarket Option) stated that the project would generate a net of 1,971 new project daily trips and 117/192 AM/PM peak hour trips. This TIS identified 108 related projects in the project vicinity including the Hollywood Center Project (previously named Millennium Hollywood Project). As you know, the existing LOS on US-101 is operating at or near capacity. Many of the project's and trips generated by other nearby projects would be traveling on the State facilities once the projects are built. As such, Caltrans anticipates potential significant cumulative traffic impacts on the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate potential significant cumulative traffic impacts.
3. On page 71 of TIS, Table 9 Existing with Project Conditions, "LOS based on field observation...the calculated average operating conditions may appear better than is observed." Caltrans cannot verify this statement as neither the referenced date of the observation nor the field data are provided in the TIS.
4. Please provide the data supporting the existing condition description at Location No. 1 Vine Street & Franklin Avenue/US-101 SB Off-ramp and Location No. 2 Argyle Avenue & Franklin Avenue/US-101 NB on-Ramp. For example, Location No. 1, we are not able at this time to concur with the LOS "A" for both AM/PM peak hour in Table 5, page 33 of TIS.
  - a. The Project is expected to add 85 and 118 vehicles per hour (vph) during AM and PM peak periods respectively (Figure 6, page 43 of TIS).
  - b. This off-ramp, with a length of about 1,400 feet, has a 2017 demand of 1,578 vph and 1,143 vph during the 2017 AM/PM peak hours respectively.
  - c. There is one lane at the entrance, 2 lanes at it terminus with Vine St. with a total storage distance of about 2,400 feet equivalent to a capacity of about 85 vehicles. Based on the data, the LOS is lower than LOS "A".
5. On page G-11 of TIS, the segment of US-101 between Western Ave. and Highland Ave. represents one of the congested bottlenecks in Los Angeles County with speeds well below the posted limit of 55 mph for both its north and south directions. The existing condition analysis on the mainline should reflect the existing demand and meet drivers' perception. Therefore, we do not concur with the existing conditions as listed in Table G-4, Existing Operating Conditions Freeway Segment Level of Service Evaluation.



6. For queuing analysis from pages G-19 to G-21, the analysis does not appear to reflect the existing conditions.
  - a. For example, Location No. 1, SB US-101 off-ramp at Vine St./Franklin Ave., the movements allowed are thru and right only with the right-turn movement that has an existing demand of 1,148 vhp vs. the thru movement with 130 vph. When calculating que length from those numbers, the results differ from those reflected in Table G-12.
  - b. As a reminder, Caltrans is concerned that additional traffic exiting the freeway may potentially back into the mainline through lanes if the queue exceeds the storage capacity on the off ramps. A queuing analysis should be performed using HCM methodology. The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with a safety factor. The existing queue length should be calculated from the traffic counts, actual signal timing, and the actual percent of truck assignments with an adequate passenger car equivalent factor.
  - c. Signal optimization should be considered as a mitigation measure.
7. From page 79 to page 83, Signal Warrant Analysis, before making a determination on the need of a traffic signal at every studied intersection, the warrant analysis needs to be conducted for all warrant cases including other safety measures, pedestrian, etc., and not just the peak-hour warrant. We note that, based on Table 13 (page 83 of TIS) Signal Warrant Analysis, a signal is needed at Location No. 25, Gower Street & US-101 Southbound Off-ramp/Yucca Street.
8. Storm water run-off is an important issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.
9. 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.

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Per phone the conversation with traffic consultant, Gibson Transportation Consulting, Inc. on May 28, 2019, the developer understands Caltrans's traffic concerns and is willing to discuss further and possibly enter into a fair share agreement in the future. We may provide additional comments or concurrence based on any follow-up meetings. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-LA-2016-02420AL-DEIR.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse