DEPARTMENT OF TRANSPORTATION

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September 27, 2021

Polonia Majas City of Los Angeles, Department of City Planning 221 N. Figueroa Street, Suite 1350 Los Angeles, CA 90012 Governor's Office of Planning & Research

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STATE CLEARING HOUSE

RE: 5420 Sunset Project – Draft Environmental Impact Report (DEIR) SCH # 2017061075 GTS # 07-LA-2017-03686 Vic. LA-101/PM: 5.844

Dear Polonia Majas:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The Project proposes the development of a new mixed-use project on a 6.75-acre site located at 5420 Sunset Boulevard within the Hollywood Community Plan and Vermont/Western Station Neighborhood Area Specific Plan areas of the City of Los Angeles. It would replace an existing grocery store, vacant commercial space, fast-food restaurant, and associated parking areas with a new mixed-use development consisting of 735 multi-family residential units and up to 95,000 square feet of neighborhood-serving commercial uses, including market/retail and restaurant uses. The proposed uses would be provided within four buildings and supported by 1,419 vehicle parking spaces as well as 548 bicycle parking spaces. Overall, the Project would remove approximately 100,796 square feet of existing floor area and construct up to 882,250 square feet of new floor area, resulting in an increase of 781,454 square feet of net new floor area within the Project Site. The Floor Area Ratio (FAR) on the Project Site would be a maximum of 3 to 1. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 2,400 feet from the US-101 and SR-2 (also known as Santa Monica Boulevard) interchange. From reviewing the DEIR, Caltrans has the following comments.

Regarding the household Vehicle Miles Traveled (VMT) analysis, Caltrans supports the proposed Transportation Demand Management (TDM) strategies to reduce household VMT. These strategies include providing bike parking and implementing pedestrian network improvements.

Regarding the commercial VMT analysis, please provide additional evidence that a net reduction in square footage of commercial uses would necessarily result in a reduction in VMT. Also, please provide evidence for the LADOT threshold of 50,000 square feet of *net* retail uses to warrant a further VMT analysis. In the December 2018 *Technical Advisory on Evaluating Transportation Impacts* in CEQA by the California Governor's Office of Planning and Research (OPR) (http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf) it recommends a threshold of 50,000 square feet of *total* retail uses for conducting a more detailed VMT analysis.

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For more information on determining transportation impacts in terms of VMT on the State Highway System, see Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf. Note that Caltrans' new TISG is largely based on OPR's 2018 Technical Advisory.

The following information is included for your consideration. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement TDM strategies like those mentioned above, which will reduce VMT and Greenhouse Gas (GHG) emissions. To further reduce VMT, the City should consider providing less vehicle parking. The DEIR states that the project is offering the maximum number of vehicle parking spaces permitted based on the Hollywood Community Plan and Vermont/Western Station Neighborhood Area Specific Plan. We encourage the City to offer the minimum number of parking spaces permitted based on the Specific Plan. This is because parking research suggests that abundant car parking can encourage driving, induce VMT, and undermine a project's ability to encourage use of public transit options, like the Metro station near this project.

Finally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans supports the measure in the proposed Construction Traffic Management Plan to limit construction traffic to off-peak periods, as this will minimize potential impacts on State facilities. If construction traffic is expected to cause issues on any State facilities, please send us this plan for our review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2017-03686.

Sincerely,

MIYA EDMONSON

Miya Edmonson

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse