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Governor's Office of Planning & Research

November 25, 2019

**NOV 25 2019**

**STATE CLEARINGHOUSE**

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  
Ref. GTS # LA-2017-02420-DEIR  
GTS # LA-2017-02865-FEIR

Dear Ms. King:

This is a follow-up to Caltrans letter dated May 30, 2019, and the Final Environmental Impact Report. Caltrans has the following comments after reviewing the Responses to Comment regarding the Modera Argyle Project.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. We encourage all Lead Agencies to work with Caltrans so adequate traffic impact on the State facilities can be identified and feasible mitigation can be implemented.

At the time of this project application, there were 108 related projects in the Hollywood vicinity, including the Hollywood Center Project (previously called the Millennium Hollywood Project). The Modera Argyle is approximately two blocks away from Hollywood Center Project. The project applicant for that project the City have invited Caltrans to participate scoping meetings before a traffic analysis has been prepared. Here, although Caltrans does not have any record of providing meaningful and significant consultation for the City and the traffic consultant prior to the preparation of this traffic analysis, in Response to Comment No. 3-7, the FED states that "[t]he City and Traffic consultant have consulted with Caltrans throughout the environmental process (i.e., through the Notice of Preparation [NOP] process, LADOT Memorandum of Understanding [MOU], and public comment period for the review of the Draft EIR)". If the City has record of these consultation, please forward for our record.

The City further states that "[t]he City's continued reliance on the Caltrans Agreement was based upon a verbal direction from Caltrans that the Agreement would remain in effect until

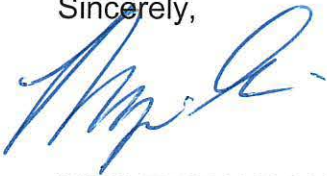
Ms. Kathleen King  
November 25, 2019  
Page 2

the City formally implements a VMT methodology, which occurred on July 30, 2019.” We have no record of any given the City any such verbal direction and reiterate our position expressed in our letter dated May 30, 2019, that the Agreement has expired and should not be relied upon until a new Agreement is executed. However, we are delighted that the Caltrans facilities were analyzed per Appendix G of the Transportation Impact Study.

Overall, Caltrans continues to have traffic concerns after reviewing the Response to Comment. In order to promote the public interest and develop a meaningful outcome, we would like the opportunity to meet with City staff, the applicant, and the traffic consultant to discuss Caltrans’ traffic concerns further, so those impacts can be addressed and mitigated.

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-2016-02865AL-FEIR.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse