#### DEPARTMENT OF TRANSPORTATION

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Making Conservation

a California Way of Life

February 24, 2022

More Song City of Los Angeles Department of City Planning 200 North Spring Street, Room 763 Los Angeles, CA 90012



RE: ENV-2020-1620-ND/Palmer Hotel Project SCH # 2022020018 Vic. LA-101/PM 6.53 to 7.06 GTS # LA-2022-03843-ND

## Dear More Song:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The Project includes the adaptive reuse, rehabilitation, and conversion of an existing vacant four-story 32,980-square-foot building into a 57-room hotel with 8,885 square feet of restaurant and lounge uses. The Project would incorporate an activated rooftop with a restaurant, pool, bar, and sunning area and the addition of approximately 835 square feet of new floor area on the rooftop level. The Project is anticipated to be complete in Year 2022.

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:

# http://opr.ca.gov/ceqa/updates/guidelines/

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.

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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, all future developments 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. 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.

For this project, 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://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

### **Pedestrians and Bicycles**

The Project would not result in a permanent removal/modification that would lead to the degradation of pedestrian or bicycle facilities. Although the Project may intensify use of existing pedestrian and bicycle facilities, the Project would provide adequate measures to ensure the safety of those accessing the site and utilizing the streets surrounding it. The Project will incorporate pedestrian and bicycle-friendly designs, such as a bicycle parking and adequate sidewalks.

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#### **Transit**

The Project is served by multiple bus lines along Hollywood Boulevard operated by Metro and DASH. Additionally, the Metro B (Red) Line Hollywood/Vine Station is within 700 feet of the Project Site.

## **VMT**

Caltrans acknowledges that the project originally proposed 90 hotel rooms and 11,000 square-feet of restaurant space. The project now proposes 57 hotel rooms and 11,310 square-feet of restaurant space. In the original analysis the proposed project had no Vehicle Miles Traveled (VMT) for Household and a Work VMT of 6.3, which was below the threshold of 7.6. The revised project still has no Household VMT and a Work VMT of 6.8, which is also below the threshold. Therefore, under the revised analysis there is no CEQA significant impact and no mitigation measures would be required. However, a post-development VMT analysis with all mitigation measures should be prepared for monitoring purpose and for future project thresholds in the area. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

As a reminder, 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. We recommend large size truck trips be limited to off-peak commute periods.

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-2022-03843-MND.

Sincerely,

MIYA EDMONSON

Miya Edmonson

IGR/CEQA Branch Chief

email: State Clearinghouse