

Attachment #1

Comment Letter A3

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
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October 20, 2014

Mr. Clarice Nash
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

RE: LAC+USC Medical Center Campus
Master Plan
Vic. LA-05/PM 18.78, LA-10/PM 19.07
SCH # 2014051061
IGR/CEQA No. 140915AL-DEIR

Dear Mr. Nash:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is a master plan on the medical campus over a period of 25 years including 450 new hospital beds, medical offices, laboratories and other supporting functions. Full buildout of the master plan could result in a total of approximately 1,725,000 square feet of development throughout the campus.

1

Appendix D from the Traffic Impact Study (TIS), prepared in August 2014, indicates that a freeway screening analysis is used per the Agreement between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures. This agreement only applies when the projects are developed and reviewed by the City of Los Angeles Department of Transportation. In addition, Caltrans sent a comment letter dated August 1, 2014 for the Los Angeles County General Plan Update and met with County staff regarding consultation with Caltrans when preparing a traffic study to determine the impacts that a local development project would have on State facilities.

2

3

Although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. CMP requirements were developed by Los Angeles County in the context of CMP goals and objectives; it does not supersede the criteria from the responsible agency under CEQA. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements and criteria of significance to be used in the traffic impact analysis. The CMP analysis may not include site-specific safety considerations, or may not be based on an appropriate measure of effectiveness for site-specific considerations.

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On page 27 of the TIS, "A trip distribution pattern was developed for the project based on two sources. Home zip code data of existing LAC+USC patients and employees was supplied by Los Angeles County staff and then mapped. This data was supplemented with a select zone analysis using the City of Los Angeles' Transportation Demand Model (Year 2010) to inform the general distribution pattern for this study." Caltrans would like to review the select zone analysis so the potential traffic impact on the freeways can be identified properly.

5

On Table 5, Proposed Project Trip Generation, the Lead Agency should verified and validate each existing land use for its accurate trip generation. For example, Laboratory and Clinic Buildings trip generation should be separated and how many existing bed is in operation need to be disclosed properly in order to calculate an accurate trips generation. The usage of trips credit for internal (15%), transit (15%), and pass-by trips (20%) needs to be conservative and justified even when using the City of Los Angeles' criteria. Otherwise, the trip generation as shown does not provide sufficient data. Based on this information, it appears that 3,944 daily trips and, 711/502 AM/PM peak hour trips are low.

6

Caltrans would like the County to disclose the traffic impact to the off-ramps by preparing a queuing analysis using 85th percentile. For a more accurate off-ramp queuing analysis, capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with 30 feet per car. Generally, the demand of the off-ramp should be calculated from the traffic counts, actual signal timing percent of truck assignment on the ramp with a passenger car equivalent factor of 3.0.

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When the level of service is changing from one level to another level and at least 50 trips will be assigned to the study location. Potentially, an improvement will be needed for the following ramps:

- Location # 2, SB I-5 off-ramp to Mission Rd.
- Location #14, NB I-5 off-ramp to Cesar E Chavez Ave.
- Location # 18, EB I-10 off-ramp to Soto St.
- Location # 20, WB I-10 off-ramp to Soto St.

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On Table 6, Trip Generation Estimates for Related Projects, there will be 43,379 daily trips, 3,335/4,101 AM/PM peak hour trips. In the project vicinity, the Level of Service for I-10 and I-5 are operating at LOS E and F. Many of the related trips will be utilizing the State facilities. Therefore, we believe a cumulative traffic impact will occur. The decision maker should be aware of this issue and be prepared to mitigate cumulative project impact in the future. We recommend the County establish a mechanism to address cumulative transportation impacts.

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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. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

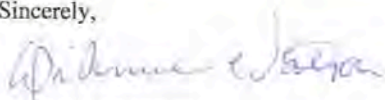
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Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

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If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 140915AL.

Sincerely,



DIANNA WATSON
Branch Chief
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

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Responses to the October 20, 2014, Comment Letter from the California Department of Transportation

Response to Comment A3-1

This comment summarizes the overall level of development allowed for under full buildout of the proposed Master Plan and thanks the County for including Caltrans in the environmental review process. No further response is necessary.

Response to Comment A3-2

The comment acknowledges that a Freeway Screening Analysis was prepared for the proposed project and was included in the draft EIR, per an agreement between the City of Los Angeles and Caltrans District 7, and notes that the agreement only applies when projects are developed and reviewed by the City of Los Angeles Department of Transportation.

The lead agency for the environmental analysis of the proposed project, a Master Plan to guide the long-term development of the LAC+USC Medical Center Campus, is Los Angeles County. The site is owned by the County and the facilities there are operated by the County. Because the project is wholly surrounded by the City of Los Angeles, however, the County and the City jointly scoped the traffic study and agreed at the outset that the procedures outlined in the Traffic Study Policies and Procedures developed by the City of Los Angeles Department of Transportation would be applied in the analysis of city-maintained facilities.

The screening criteria listed below were applied to the proposed project to determine if the proposed project would require an impact analysis on the freeway system beyond the freeway analysis required under the Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Management Program (CMP).

- *The screening criteria state that freeway mainline segments should be evaluated if a project adds traffic equivalent to 1% or more of capacity when a segment or off-ramp operates at LOS E or F, or 2% or more of capacity when a segment or off-ramp operates at LOS D, and further specifies that a capacity value of 2,000 vehicles per hour (vph) per lane for freeway segments and 1,500 vph per lane for off-ramps should be used in this screening.*

This detailed screening analysis is documented in a memorandum attached as Appendix D of Appendix G of the draft EIR, the Traffic Study prepared by Fehr & Peers dated August 2014.

The screening analysis and evaluation included seven freeway segments and six freeway off-ramps in the vicinity of the project site (and thus likely to carry the highest number of project trips). The evaluation calculated freeway segment level of service using both volume data from PeMS and speed data from INRIX and conservatively used the worst – case level of service in the segment screening analysis. Baseline turning movement counts collected for the draft EIR traffic study and observations of the existing signal timing and phasing were used in the off-ramp screening analysis.

In Appendix D of the Traffic Study in Appendix G of the draft EIR, Table 2 summarizes the Freeway Segment screening analysis for the a.m. and p.m. peak hours, and Table 3 summarizes the screening analysis for off-ramps during the a.m. and p.m. peak hours. The screening analysis concluded that the proposed project would not require freeway traffic impact analysis beyond the freeway analysis that was prepared under the requirements of the CMP.

Response to Comment A3-3

The comment states that comment letter was sent by Caltrans to Los Angeles County regarding another project in August 1, 2014 and that a meeting was subsequently held between the County and Caltrans staff regarding interagency coordination.

This comment is noted. However, the Memorandum of Understanding for conducting the traffic impact analysis was executed by the project team and the County on June 19, 2014. This Memorandum of Understanding required the project to analyze the potential traffic impact on the following freeway segments:

- I-10 Freeway at East LA City Limit
- State Route 60 east of Indiana Street
- US-101 north of Vignes Street
- State Route 110 at Pasadena Avenue
- I-5 Freeway at Stadium Way

Consultation with Caltrans was conducted at the outset of the study process through the CEQA process. A comment letter during the scoping period, dated May 27, 2014, was received from Caltrans, and is included in Appendix A of the draft EIR.

The NOP comment letter states that a traffic study should be prepared in advance of the draft EIR, and references the general "Guide for the Preparation of Traffic Impact Studies" (Caltrans, December, 2002). The letter lists some elements that should be included in the traffic study, including the methods used to estimate trip generation, distribution, mode choice, and assignment of trips to I-10 and I-5 and the nearest freeway ramps. Each of these elements was included in the study and is described in detail in Chapter III of Appendix G to the draft EIR.

The NOP comment letter recommends consistency with regional and local modeling forecasts, which was addressed through the use of an ambient growth factor for this area that was drawn from the regional (Metro) model, which was found to be slightly more conservative than the growth forecast from the City of Los Angeles model.

The NOP comment letter requests analysis of daily traffic volumes, and AM and PM peak hour volumes on freeways, interchanges, intersections, and HOV facilities, and requests the use of the HCM 2000 methodology, make realistic estimates of transit use and include traffic growth related to other development projects in the area. The draft EIR analysis analyzed existing conditions at six freeway off-ramps at nearby interchanges using the HCM 2000 method, as requested. Additional analysis was conducted of freeway mainline segments and intersections using other methods specified by the lead agency and a local responsible agency, the City of Los Angeles. The intersection analysis methods were consistent with what is specified in the traffic impact analysis guidelines used by Los Angeles County and the City of Los Angeles. Two approaches to conducting

freeway mainline analysis were used in the draft EIR following consultation with County and city staff: one was the threshold-test specified in the CMP (discussed further in response to Comment A3-4) and the other was the screening criteria analysis mentioned in response to Comment A3-2. These freeway analyses are presented in Chapter V of Appendix G of the draft EIR.

The NOP comment letter requests analysis of all appropriate traffic volumes, specifying Existing + Project + Other Projects + Other Growth. Each of these elements was included in the growth projections described and presented in Chapter IV of Appendix G of the draft EIR. Because neither the County nor Caltrans has an applicable defined threshold of significance for daily traffic volumes, forecasting and analysis was limited to the AM and PM peak hour volumes. Estimated daily traffic volumes were, however, reported for the proposed project and for other planned development projects in the area.

The NOP comment letter requests that the study include a discussion of “mitigation measures appropriate to alleviate anticipated traffic impacts.” A detailed discussion of identified impacts and mitigation measures is provided in Chapter IV of Appendix G of the draft EIR. As requested in the NOP comment letter, mitigation involving TDM was conservatively estimated.

The NOP comment letter requests that the study include specification of the developer’s percent share of the cost of realistic mitigation measures. As stated in the Mitigation Monitoring and Reporting Plan included in the Final EIR, Los Angeles County would be responsible for 100% of the cost of the identified mitigation measures.

The NOP comment letter concludes by recognizing that Caltrans will receive a copy of the draft EIR from the State Clearinghouse and extending an offer to meet with the County and its consultant. This offer was not accepted, as the analysis conducted in the draft EIR did not identify impacts to the regional transportation system.

Response to Comment A3-4

The comment states that Caltrans does not consider CMP criteria alone to be adequate for the analysis of transportation impacts under CEQA, noting that CMP requirements do not supersede other applicable criteria established by responsible agencies. The comment states that Caltrans’ normal requirements are that it be consulted early in the study process to determine what analysis and impact criteria should be used for assessing impacts to the State Highway System.

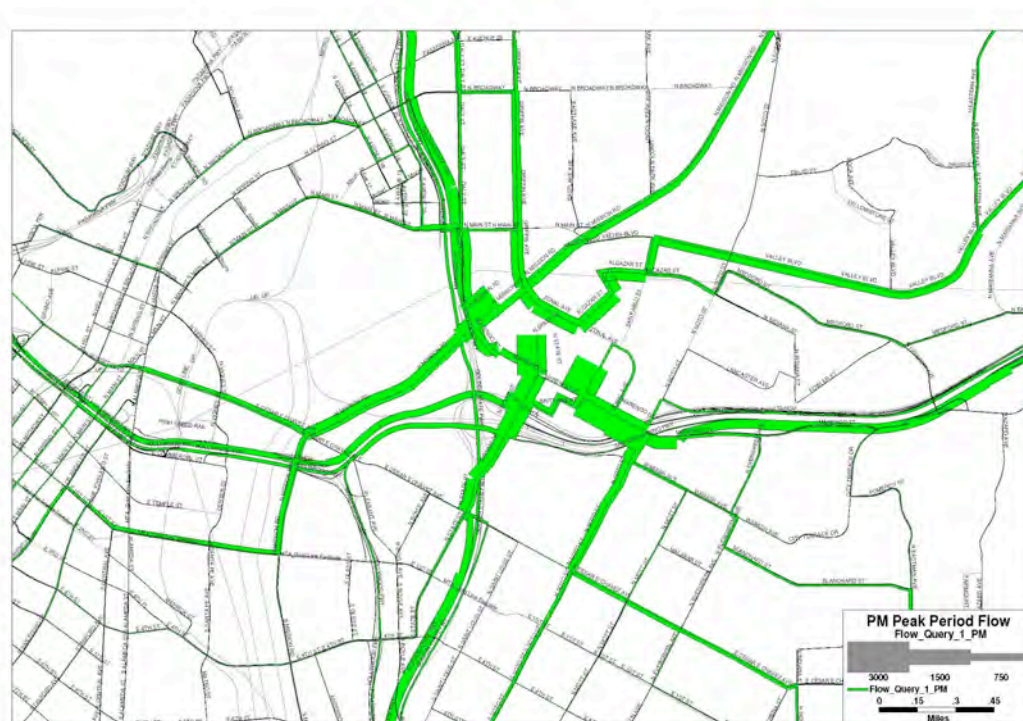
The traffic impact study included in the draft EIR was prepared in a manner consistent with the City of Los Angeles traffic study policies in effect when the study was begun, which include analysis to comply with the local Congestion Management Program, and application of the Freeway Screening Analysis described above in Response to Comment A3-2. The CMP, which is a statutory requirement administered by the Los Angeles County Metropolitan Transportation Authority (Metro) that became effective with the passage of Proposition 111 in 1990, includes procedures for measuring a project’s impacts on the freeway system. Both the city’s and Metro’s guidelines clearly define what constitutes a significant traffic impact and both were used to assess the project’s traffic impacts. The Caltrans Guide for the Preparation of Traffic Impact Studies (December 2002) does not define significant impact thresholds. Since Caltrans has not

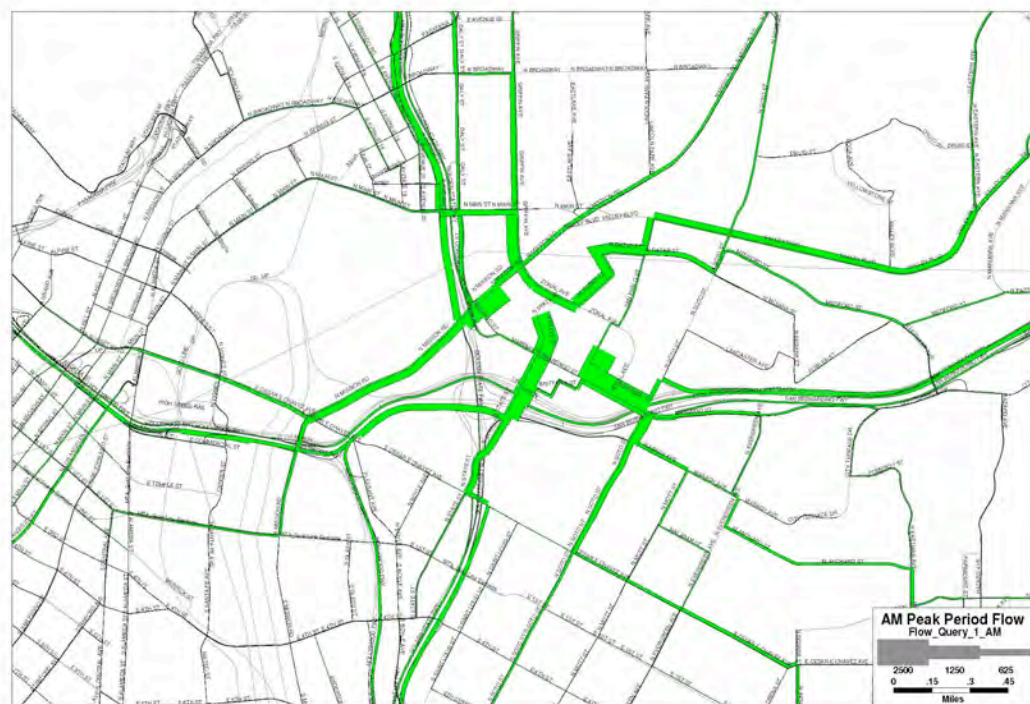
adopted generally applicable thresholds of significance, the analysis methods described in the Metro CMP and the screening analysis described in the response to Comment A3-2 were utilized to assess freeway and off-ramp impacts. The Metro CMP provides clear and consistent evaluation procedures for evaluating freeway impacts.

Response to Comment A3-5

The comment notes that the overall trip distribution pattern used in the draft EIR traffic analysis was based, in part, on use of the City of Los Angeles travel demand forecasting model and asks to review the select zone analysis to properly identify the project's potential traffic impact on the freeways.

The trip distribution and trip assignment patterns were among the basic elements of the traffic study that were determined in consultation with LADOT and Los Angeles County staff at the outset of the study process. As noted in the comment, and as stated on page 3.14-12 of the draft EIR and on page 27 of the traffic study, the overall trip distribution pattern was developed for the project using several sources. Initially home zip code data for existing patients and employees was mapped. As a supplemental input, a select zone analysis was conducted using the City of Los Angeles model. The select zone run plots for the AM and PM peak periods, which depict the raw unadjusted model output, are provided below as requested in the comment. These inputs were used, together with local knowledge of the surrounding street system and professional judgment, to assign project traffic to the surrounding street and freeway system. It is important to recognize that the data in these plots was not used blindly but, as discussed above and as explained in the draft EIR, it was used as one of several factors in assigning project-related traffic to the freeways.





Response to Comment A3-6

The comment recommends that the Lead Agency verify and validate the trip generation of existing land uses and suggests that a more discrete breakdown of on-site land uses be used in calculating existing trip generation, and that the number of occupied beds be disclosed. The comment states that adjustments for internal, transit, and passer-by trips should be made conservatively to avoid underestimating site-generated trips and concludes by expressing an opinion that the net trip generation estimates presented in the draft EIR appear low.

The draft EIR includes information on the size of existing buildings housing active on-site uses that would be removed as part of the proposed master plan, as well as the proposed development program. Information is also provided in the draft EIR on vacant buildings, such as the Women's and Children's Hospital, that would be removed. The summaries presented in Table 2-1 on page 2-15 of the draft EIR and in Table 5 of Appendix G to the draft EIR include a detailed breakdown of the relevant land uses, including Medical Office, General Office, Heavy Industrial, Utilities, Warehousing, Hospital, Specialty Retail, Research & Development, and Recreational Community Center. Of these land use types, the first five were applied to occupied buildings that would be removed under the proposed master plan project.

The sizes and uses of the existing active buildings to be removed were based on detailed building-by-building data gathered during the master plan process and compiled in the "Building & Site Assessment Report." The tables cited above do not include vacant buildings or vacant portions of buildings, such as the upper floors of the former General Hospital building, nor do they include occupied buildings or areas where no change is proposed as part of the project, such as the new General Hospital inpatient tower; those

site elements were not included in the overall net trip generation estimates for the project. Trip credits were only taken for existing, active uses that would be removed by the project.

Each of the land use categories listed above is included in the “Trip Generation Manual, 9th Edition,” which provides specific trip generation factors based on empirical studies of similar facilities throughout the country. Responding to the comment, the Medical Office land use was used to estimate existing and future trips associated with laboratories and clinics, consistent with the land use description in “Trip Generation Manual, 9th Edition,” which says that a medical office building is a “facility that provides diagnoses and outpatient care on a routine basis but is unable to provide in-house medical and surgical care.” No trip generation rates are provided for Laboratories alone. Very limited data is provided for a separate Clinic land use category but it was not used because it is based on a very small data set, and because the Medical Office rates were appropriate.

As stated on page 1 of “Trip Generation Manual, 9th Edition,” the data was “primarily collected at suburban locations having little or no transit service, nearby pedestrian amenities or travel demand management (TDM) programs” and notes that it is appropriate to adjust the published trip generation rates to reflect “the presence of public transportation service, ridesharing, or other TDM measures; enhanced pedestrian or bicycle trip-making opportunities; or other special characteristics of the site or surrounding area.” Such adjustments were made in the draft EIR to reflect the characteristics of the LAC+USC Medical Center Campus Master Plan project and its surroundings, and were reviewed and approved by both County and city staff during the scoping of the traffic study.

The 15% adjustment to the trip generation estimates to account for trips between the various uses on the site was made to acknowledge the fact that the facilities on the campus do not stand alone, and is consistent with the internal trip adjustment made in previous studies for similar projects in the immediate area. A further 15% adjustment was then made for transit use at existing and proposed facilities, because the site is well-served by transit and this adjustment is consistent with LADOT’s “Traffic Study Policies and Procedures.” In addition, the pass-by trip adjustment was made only to the proposed community-serving uses. The adjustments of 20% to the proposed Wellness-Oriented Community Meeting Space and Community-Serving Use and 10% to the Wellness-Oriented Community Retail Space were based on the pass-by rates specified in Attachment I of LADOT’s “Traffic Study Policies and Procedures.” While some patrons of the Community-Serving uses may be walk-ins from the surrounding area, a separate discount was not made for this phenomenon, but rather the pass-by adjustment in essence conservatively reflects the combined effect of both pass-by and walk-in trips (a total reduction of only 26 trips in the AM peak hour and 35 trips in the PM peak hour). In all, the draft EIR study estimates for future trip generation are approximately 30% lower than they would have been without adjustments for transit, internal, and pass-by trips.

Response to Comment A3-7

The comment states that Caltrans would like the County to disclose traffic impacts to off-ramps by preparing a queuing analysis, and suggests some techniques for doing so.

As discussed in the response to Comment A3-2, the traffic impact study was prepared following initial consultation with Caltrans and under close coordination with the Los Angeles County Department of Public Works and LADOT, and in a manner consistent with LADOT's traffic study guidelines and the Metro CMP. This provides clear and consistent evaluation procedures for evaluating freeway impacts. The draft EIR includes the results of a Freeway Impact Screening Analysis that concluded that the proposed project would not require freeway traffic impact analysis beyond the freeway analysis that was prepared under the requirements of the CMP.

This comment letter does not define significant impact thresholds, either for freeway off-ramps or for other facilities, nor does Caltrans' "Guide for the Preparation of Traffic Impact Studies." This is clearly stated in Caltrans' recent environmental impact report for the 1-710 Corridor Project: "Caltrans has not adopted specific thresholds of significance for determining whether an impact is significant." Since Caltrans has not adopted thresholds of significance, the process of determining traffic impacts at off-ramps (beyond what is presented in the draft EIR) and mitigation is subjective and questionable. The Metro CMP provides clear and consistent evaluation procedures and has been adopted by the County.

Response to Comment A3-8

The intent of this comment is unclear. It mentions changing levels of service and "at least 50 trips assigned to one study location." The comment concludes by stating that unspecified improvements may be needed at four particular freeway off-ramps.

As shown in Section 3.14 and Appendix D of Appendix G to the draft EIR, fewer than 50 net new trips are expected to use the off-ramps listed in the comment. The addition of project traffic was found to result in a change in level of service at only one of these locations, I-5 Northbound Off-Ramp & Cesar E. Chavez Avenue under Existing plus Project conditions; the change from LOS B to LOS C is not considered significant under any applicable thresholds. The detailed traffic impact analysis presented in the draft EIR includes six freeway off-ramps in the vicinity of the project site and determined that the project would contribute to a cumulative significant impact at one of them, the westbound off-ramp to Soto Street from I-10 in the AM peak hour, based on the applicable criteria, and identified mitigation to address that impact (mitigation measures MM-TRAF-3). As a point of information, this off-ramp was widened within the last three years to provide an additional westbound right-turn lane.

Response to Comment A3-9

The comment restates data presented in the draft EIR regarding the estimated number of trips generated by several other projects within approximately 1.5 miles of the project site and concludes that a cumulative traffic impact will occur. This is consistent with the findings of the draft EIR, which identified significant impacts under Cumulative plus Project conditions, and identified mitigation measures where feasible. It should be

noted that two of the nine related projects, the Wyvernwood Boyle Heights Project and the Sears Building Adaptive Reuse Project, when combined represent over 70% of the total growth in traffic attributable to specific related projects.

The comment also recommends that the County establish a mechanism to address cumulative transportation impacts on the I-10 and I-5 Freeways. Since the County does not maintain these facilities, the County will direct project applicants to consult with Caltrans.

Response to Comment A3-10

The proposed project would incorporate post-construction mitigation measures for stormwater as described in mitigation measures MM-HYD-2, MM-HYD-5, and MM-HYD-6 in Section 3.8 of the EIR.

Response to Comment A3-11

The comment advises that oversized vehicles traveling on State highways must obtain a transportation permit from Caltrans and recommends that large truck trips be limited to off-peak commute periods.

As indicated in this comment, if the use of oversized-transport vehicles on State highways becomes necessary during project construction, the project would be required to obtain a Caltrans transportation permit. Construction truck trips could occur during peak periods. However, Mitigation Measure MM-TRAF-1 in Section 3.14, Transportation/Traffic of the draft EIR requires the County to devise a Traffic Control Plan to be implemented during construction of the project. As part of that plan, haul routes for deliveries and pick-ups of construction materials would be defined as well as appropriate restrictions on travel times.