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December 1, 2020

Governor's Office of Planning & Research

**Dec 01 2020**

Brittany Arceneaux, City Planner  
City of Los Angeles  
200 N. Spring Street, Room 667  
Los Angeles, California 90012

## STATE CLEARINGHOUSE

RE: Downtown Community Plan Update - Draft  
Environmental Impact Report (DEIR)  
SCH# 2017021024  
GTS# 07-LA-2017-03335  
Vic. LA Multiple

Dear Brittany Arceneaux,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project proposes updates to the Central City and Central City North Community Plans, adoption of the New Zoning Code, and the adoption of necessary revisions and any other amendments necessary to implement the above, including amendments to other General Plan elements (such as, Mobility and Framework), the Los Angeles Municipal Code, specific plans, and other ordinances to implement those updates.

The nearest State facilities to the proposed project are US 101, Interstate 110 and Interstate 10. After reviewing the DEIR, Caltrans has the following comments:

The size and scope of the proposed Community Plans provides a unique opportunity for the various communities in Downtown Los Angeles to identify their needs and provide feedback for the type of public realm they want when making their daily trips. Caltrans requests that the Central City and Central City North Community Plans clearly identify all locations where improvements can be made for people walking, biking, rolling or taking transit along, across, or adjacent to State facilities within the Plan area. Please be specific on the locations within Caltrans right-of-way where improvements are desired and what type of infrastructure is preferred. Some examples include protected Class IV bikeways, wider sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, reduced crossing distances, roadway narrowing, pedestrian and bicycle signage, flashing beacons, and refreshed or new crosswalks. Plans that incorporate public engagement, like the one proposed, are used to identify and develop future State transportation projects.

Future car volumes and speeds at individual off-ramps in and near the Downtown Plan Area cannot be predicted with any degree of certainty at this time because it is not known how conditions may change over time and what the City and Caltrans may implement to address any accessibility or safety issues that may arise. Therefore, any detailed analysis of potential future impacts related to off ramps would be speculative. Nevertheless, Safety is paramount for the City of Los Angeles and Caltrans. The growth in housing, business, and population, as projected in the DEIR, will require diligence in order to meet Statewide VMT reduction targets and LA's Vision Zero goals. This is why Caltrans is requesting a location-specific list of barriers, and the preferred infrastructure solutions to those barriers, be included in the Community Plans, so that people walking, riding bikes, or using transit within State Right-of-Way can be safely accommodated. This can help Caltrans and LA City identify the appropriate infrastructure when developing projects within the Plan area.

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 that the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure and that the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Considering that a new Zoning Code is being adopted alongside the Community Plans, Caltrans also recommends significantly reducing or eliminating car parking requirements. Research looking at the relationship between land-use, parking, and transportation indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose public transit and active modes of transportation. For any community or city to better support all modes of transportation and reduce vehicle miles traveled, we recommend the implementation of a TDM ordinance, as discussed on page 3-49, as an alternative to requiring car parking.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2017-03335.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse