

Appendix FEIR-1

Draft EIR Comment Letters

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Making Conservation
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February 20, 2024

Kathleen King
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012

RE: 1100 E. 5th Street Project – Draft
Environmental Impact Report (DEIR)
SCH# 2018021069
GTS# 07-LA-2018-04418
Vic. LA-101 PM 0.648

Dear Kathleen King,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The 1100 E. 5th Street Project proposes the demolition of three existing warehouse buildings and a surface parking lot, to allow for the construction of an eight-story, mixed-use building comprised of 220 live/work units of which 11 percent (25 units) would be deed-restricted for Very Low Income households, and up to 46,548 square feet of ground-floor commercial uses. The Project would include a total of 249,758 square feet of floor area, for a Floor Area Ratio (FAR) of 4.75:1, and a maximum building height of 116 feet to the top of the parapet. Vehicle parking would be provided within three subterranean parking levels.

1

The Project includes an increased commercial option that provides the flexibility to replace 20 live/work units with up to 64,313 square feet of commercial uses, with an increase of the commercial floor area by an additional 17,765 square feet. There would be no change to the proposed building envelope, residential open space, percentage of deed-restricted Very Low Income households, or the number of vehicle subterranean parking levels.

The nearest State facility to the proposed project is US 101. After reviewing the DEIR, Caltrans has the following comments:

The Project Site is located within a Transit Priority Area (TPA) and is currently served by many local lines and regional lines via stops within convenient walking distance along Alameda Street and Palmetto Street. The Project study area is located approximately 0.5 miles south of the Metro L Line (formerly Gold line) Little Tokyo/Arts District Station which is the closest transit station to the Project Site. Three new transit stations will be developed in conjunction with the Metro Regional Connector.

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Caltrans acknowledges and supports infill development that helps California to meet its climate, transportation, and livability goals. However, due to the amount of car parking being built, 381 car parking spaces total, the 1100 E. 5th Street Project unnecessarily induces demand for vehicle trips. For California to achieve its goals, this demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

- Reducing the amount of parking whenever possible. This project is not required to include parking due to AB 2097, but the resulting design suggests that the City should seriously consider adopting parking maximums. This project's location is an excellent candidate for reduced car parking due to its infill location and proximity to high-quality transit infrastructure. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation.
- Rates of car ownership and vehicle miles traveled (VMT) are significantly lower for low-income households than they are for high-income households. Seeing as this project included deed-restricted very low-income affordable housing, this should be taken into serious consideration. There is sufficient justification to consider reducing the amount of parking required for affordable housing projects, like the one proposed, in order to promote affordability and achieve the project's goals.
- If the car parking must be built, the spaces should be fully unbundled from residential units to promote affordability and expand mode choice.

3

Refer to EIA, Section K. Transportation, p. 28, it stated that the Project would provide 180 bicycle spaces. 17 short-term bicycle parking spaces for the commercial uses and 14 short-term spaces for the live/work uses would be located near the eastern perimeter on the ground floor of the Project. 129 long-term bicycle parking spaces for the commercial uses and 130 long-term bicycle parking spaces for live/work uses would be located within the first subterranean level of the parking garage. Please verify the number of bicycle spaces, as the numbers provided do not add up correctly.

4

As mentioned in the Environmental Impact Analysis (EIA), Section K. Transportation, the Project will implement the project design features (PDF) TR-1 and TR-2 to avoid or minimize adverse construction and operational related impacts.

PDF TR-1: Prior to the issuance of a building permit for the Project, a detailed Construction Staging and Traffic Management Plan (CSTMP) will be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing a construction management plan that would identify the location of any temporary lane and sidewalk closures and provide for measures to maintain both

5

directions of travel. Caltrans requests advance notification be provided to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.

PDF TR-2: Transportation Demand Management Program. A preliminary TDM program will be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the Project.

5 cont.

Caltrans recommends a post-development VMT analysis (after one year of project operation) for monitoring/validation purposes and for future project thresholds in the area. Additional TDM mitigation measures should be implemented if the post-development VMT analysis discloses any significant VMT impacts.

Finally, The Project area is located approximately 1 mile south, and approximately 1 mile west, of the US-101. Caltrans has the jurisdiction for review and approval of any work that would affect the freeways and its facilities. Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

6

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2018-04418.

Sincerely,

Frances Duong

Frances Duong
Acting LDR/CEQA Branch Chief

Cc: State Clearinghouse



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Via Email

February 8, 2024

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Re: Comment on Draft Environmental Impact Report, 1100 E. 5th Street Mixed Use (ENV-2016-3727-EIR; SCH# 2018021069)

Dear Ms. King:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Draft Environmental Impact Report (“DEIR”) prepared for 1100 E. 5th Street Mixed Use (ENV-2016-3727-EIR; SCH# 2018021069), which proposes the construction of a an eight-story mixed-use building comprised of 220 live/work units, up to 46,548 square feet of commercial uses, 22,725 square feet of open space, and three subterranean parking levels located at 1100 E. 5th Street and 506-530 S. Seaton Street in the City of Los Angeles. (“Project”).

1

SAFER is concerned that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. SAFER requests that the City of Los Angeles Planning Department address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project.

2

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

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Sincerely,

Brian B. Flynn
Lozeau Drury LLP