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Governor's Office of Planning & Research

March 30, 2020

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Erin Strellich
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

STATE CLEARINGHOUSE

RE: 2800 Casitas Avenue (Bow Tie Yards Loft
Project) – Draft Environmental Impact
Report (DEIR)
GTS # 07-LA-2017-03150
SCH # 2017021051
Vic. LA-2/PM: 15.794

Dear Erin Strellich:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced DEIR. The 2800 Casitas Avenue Project, formerly known as the Bow Tie Yards Loft Project, involves the development of a mixed-use project on a 5.7-acre site that would consist of five buildings with a total of 419 multi-family residential units (approximately 423,872 square feet) and approximately 64,000 square feet of commercial space. Approximately 35 units or 11% of the base-density residential units would be reserved as Very Low-Income Units. Commercial uses on-site may include a mix of restaurant uses, office space, and an approximate 42,000 square foot urban farm. A seven-story parking garage would provide 720 on-site vehicle parking spaces on levels one through six. The seventh level of the parking structure would be an urban farm/greenhouse. Bicycle parking spaces would also be provided. The City of Los Angeles is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 2,700 feet from the interchange of Interstate 5 (I-5) and State Route 2 (SR-2, also known as Glendale Freeway), and approximately 500 feet away from the SR-2 off-ramp near Casitas Avenue.

Caltrans commented on the Notice of Preparation for this project in our letter dated March 10, 2017. Since then, the City of Los Angeles has adopted a Vehicle Miles Traveled (VMT) metric for transportation analysis in July 2019, in accordance with Senate Bill 743 (2013). Caltrans commends the City for its early adoption of the metric that assists the State in meeting its greenhouse gas emissions and air quality targets.

Based on the City of Los Angeles' VMT Calculator tool methodology, the project is expected to generate a net increase of 2,539 daily trips, as stated on page IV.K-17 of the DEIR. Further, the DEIR states that "with the proposed Project, the Household VMT per Capita would be 12.7 compared to the threshold of 7.2, and the Work VMT per Capita would be 14.9 compared to the threshold of 12.7. Therefore, the Project would cause significant VMT impacts for both Household VMT and Work VMT." To mitigate these impacts, the project proposes implementing TRANS MM-1, which is a preliminary Transportation Demand Management (TDM) program. After implementation of this program, the Household VMT per Capita would be reduced to 10.5 compared to the threshold of 7.2, and the Work VMT per Capita would be reduced to 14.2 compared to the threshold of 12.7. As such, the proposed Project's VMT impacts per household and per capita would remain significant and unavoidable after mitigation.

Caltrans agrees with the DEIR that the impacts of this project will be significant and unavoidable after the implementation of the proposed TDM program. Additional TDM strategies that the City of Los Angeles may want to consider integrating into this project include:

- Decrease the amount of vehicle parking provided to be no more than required, which would be approximately 627 stalls for this project, according to page II-13 of the DEIR. This could be accomplished by providing additional bicycle parking.
- Ensure that the provided bicycle parking is secure, convenient, and accessible.
- Widen the east side of the Casitas Avenue sidewalk, which is currently 5 feet, in order to meet Americans with Disabilities Act (ADA) standards.
- Provide active transportation connections to the L.A. River Bike Path through creating a Class II facility on Casitas Avenue and a Class IV bicycle facility on Fletcher Drive.
- Confirm that there are ADA compliant routes between the project site and the transit stops described on page II-27 of the DEIR, and ensure that the transit stops have shelters and benches.
- Increase the one-time fixed fee contribution to the City's Bicycle Plan Trust, as Caltrans estimates that the current contribution of \$50,000 would only be able to fund an approximately ½ mile Class II bike lane.

Also, 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 support Project Design Feature TRANS-PDF-2, which is "All construction related traffic shall be restricted to off-peak hours." Since construction traffic might cause delays on State facilities, including the I-5 and SR-2, please submit the Construction Traffic Control/Management Plan detailing these delays for Caltrans' review.

In addition, stormwater run-off is a sensitive issue for Los Angeles county. Since this project is located approximately 600 feet away from the Los Angeles River, please ensure that the project is designed to discharge clean run-off water. Caltrans supports the implementation of the Storm Water Pollution Prevention Plan described in the DEIR.

Finally, encroachment permits are required for any project on or near Caltrans right-of-way. If the project applicant implements emergency access option #2, which would be an emergency access gate and driveway from the northbound on-ramp of SR-2 immediately north of and adjacent to the Project Site, then an encroachment permit might be required. However, this decision will be subject to additional review by the Office of Permits.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2017-03150.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse