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Governor's Office of Planning & Research

Jun 18 2020

STATE CLEARINGHOUSE

June 16, 2020

Debbie Lawrence
Los Angeles City Planning Department
200 N. Spring Street, Room 621
Los Angeles, CA 90012

RE: 350 South Figueroa Project – Sustainable
Communities Environmental Assessment
(SCEA)
SCH# 2020050454
GTS# 07-LA-2020-03266
Vic. LA-110 PM 23.066
Vic. LA-101 PM 1.412

Dear Debbie Lawrence,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project involves the demolition of an approximately 29,500-square foot portion of an existing office and commercial structure and construction of a new 41-story building containing 570 residential units that will be integrated into the existing structure. The Project would add approximately 624,500 square feet of new residential floor area at the southwest corner of the Project site for a combined 925,000 square feet of floor area. The Project would include activated street frontages on the building's ground floor, as well as a number of community spaces throughout the building, including open space areas on the sixth-floor podium deck and roof deck. The Project would maintain the existing six levels of parking, though the number of spaces would change. There are approximately 1,232 existing automobile parking spaces, 390 of which will be demolished and reconstructed with an additional 155 new spaces provided for a total of 1,387 automobile parking spaces. Further, the Project, in accordance with the City's bicycle parking ordinance (see LAMC Section 12.21.A.16), will include 240 long-term and 23 short-term bicycle parking spaces.

The nearest State facilities to the proposed project are I-110 and US 101. After reviewing the SCEA, Caltrans has the following comments:

State-level policy goals related to sustainable transportation seek to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG), and encourage alternative modes of travel. Caltrans' Strategic Management Plan has set targets of tripling trips made by bicycle and doubling trips made by walking and public transit by 2020. The Strategic Plan also seeks to achieve a 15% reduction in statewide, per capita, vehicle miles traveled (VMT) by 2020. Similar goals are

embedded in California Transportation Plan 2040, and Southern California Association of Governments' (SCAG) Regional Transportation Plan. Statewide legislation such as AB 32 and SB 375, as well as Executive Order S-3-05 and N-19-19, echo the need to pursue more sustainable development. Caltrans recommends the following to help California meet these goals.

- In addition to bike and cargo bike parking that is required for commercial uses, at least one long-term bike parking space per residential unit should be provided.
- Effort should be made to highlight and improve the walking and biking trip experience between the Project and the 7th/Figueroa Metro Station.
- The project shall contribute to creating and improving ADA compliant routes over I-110 at both 4th Street and 3rd Street for pedestrians and people riding bikes.
- The Project site is in a highly urbanized area in the City within a High-Quality Transit Area (HQTa) and a Transit Priority Area (TPA). The Project Area is currently served by a total of seven local and inter-city transit operators. 32 bus stops within 2 blocks of the site. As such, improvements should be made at all nearby transit stops, such as making them fully ADA compliant, and providing shade trees, benches, and shelters.
- Ingress/Egress driveways shall not have walls that block the sight-distance of approaching pedestrians and bicyclists. Pedestrians always have the right-of-way while traveling on the sidewalk, and that right shall not be compromised by signaling the driveways. i.e.: No signaling of driveways allowed.
- Project would activate street frontages on the ground floor of the building and introduce new landscaping, seating areas, and street furniture, encouraging pedestrian activity. For heightened walkability all trees should be native trees that provide significant shade and add bio-swales to capture stormwater on-site.

With regards to parking, Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. 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. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies, like those recommended in MM-TRA-1(b) from SCAG's 2016 RTP/SCS, as an alternative to building unnecessary parking. If the additional parking structures must be built, they should be designed in a way that is conducive to adaptive reuse. They should contain flat floors with ramps on the exterior edge, so that they can be more easily converted to more beneficial uses in the future.

According to Freeway Analysis under Section 6.5 in Transportation Impact Report (Appendix F), the initial evaluation concluded that neither the freeway mainline thresholds nor the freeway off-ramp threshold was met by Project traffic volumes. If this initial evaluation is available, Caltrans requests that it be provided to determine how many trips were assigned to on- and off-ramps for both SR 110 and US 101.

Additionally, 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. Any work that would affect the freeways and its facilities, Caltrans has the jurisdiction for review and approval. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03266.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse