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Governor's Office of Planning & Research

September 01 2021

STATE CLEARINGHOUSE

September 1, 2021

Cally Hardy
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

RE: Los Angeles Citywide Housing Element
2021-2029 Update and Safety Element
Update – Draft Environmental Impact
Report (DEIR)
SCH # 2021010130
GTS # 07-LA-2021-03661

Dear Cally Hardy:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The project involves updates to the City of Los Angeles General Plan Housing Element and Safety Element, and a Rezoning Program for the creation of additional housing units. The Housing Element Update will further the goal of meeting the existing and projected housing needs of all family income levels of the community through the construction and operation of 420,327 housing units; provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) Allocation of 456,643 housing units through the year 2029; and identify a Rezoning Program that will create at least 219,732 housing units of new capacity by October 2024. This will accommodate both the City's RHNA Allocation and target capacity of 486,379 housing units. The Safety Element Update will formally integrate related long-range planning efforts to ensure compliance with State law, including additions to goals, policies, and objectives to better address climate change; integration of updated background information and mapping; and incorporation and update of various programs. The project also involves a targeted update to the Plan for a Healthy Los Angeles to clarify that it is the City's General Plan Element containing environmental justice goals and policies for the City, in compliance with Senate Bill 1000. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The project covers the City of Los Angeles, which includes several state facilities, such as the Interstate (I) 210, United States 101, State Route (SR) 134, SR-118, SR-170, I-405, I-10, I-110, I-105, I-5, and I-710. From reviewing the DEIR, Caltrans has the following comments.

The DEIR states that the VMT impacts of the new Housing Element and Safety Element, as well as the Rezoning Program, should be less than significant, but that future individual housing developments might result in significant Vehicle Miles Traveled (VMT). For these individual projects, Transportation Demand Management (TDM) programs may be used to reduce their VMT impacts to less than significant levels. Caltrans supports the use of TDM measures to decrease VMT. Implementing TDM strategies aligns with Caltrans's mission is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Caltrans looks forward to reviewing the CEQA documents of future housing developments that emerge from these plan and program updates, and collaborating with

the City of Los Angeles on identifying TDM strategies to limit VMT from these future projects.

The DEIR also states that the Rezoning Program component of the project will prioritize opportunities for rezoning and development incentives in areas that are in Transit Priority Areas, near major job centers, and in higher resource areas. We also support this kind of prioritization, as it will result in limited project VMT.

In addition, the DEIR states that build out of the RHNA may contribute to queuing on freeway off-ramps that lead to unsafe speed differentials. Since the Housing Element Update is programmatic and there is currently no specific information on where safety impacts may occur as a result of freeway off-ramp queuing, it is not possible to identify appropriate mitigation measures. Therefore, impacts related to highway safety would be significant and unavoidable. Caltrans agrees with this assessment, and the idea that the LADOT and Caltrans can identify specific queuing impacts and solutions on a case-by-case basis during individual housing project reviews. Potential solutions include additional TDM strategies and changes to the ramp terminal such as traffic signalization, signal phasing, or timing modifications. Thus, like our previous statement, Caltrans looks forward to coordinating with the City of Los Angeles during the CEQA review process on identifying strategies to limit queuing and safety issues from future housing developments that emerge from these plan and program updates.

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-2021-03661.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse