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Governor's Office of Planning & Research

Mar 26 2021

STATE CLEARINGHOUSE

March 26, 2021

Norman Ornelas, Jr., Regional Planner
County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Los Angeles, California 90012

RE: Florence-Firestone Transit-Oriented District
Specific Plan – Notice of Preparation (NOP)
SCH# 2021030300
GTS# 07-LA-2021-03522
Vic. LA-Multiple

Dear Norman Ornelas,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Florence-Firestone Transit-Oriented District (FFTOD) Specific Plan will implement the LA County General Plan 2035 TOD Program. TODs are defined in the General Plan as the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community, three Metro A Line stations are present: the Slauson, Florence, and Firestone Stations. The goals of the FFTOD Specific Plan are to create transit-accessible housing development; increase job-generating uses and economic activity; develop a safe and attractive transportation network; increase walking, bicycling, and transit ridership; and streamline the environmental review process for future development projects in the community.

The nearest State facilities to the proposed project are I-110 and I-105. After reviewing the NOP, Caltrans has the following comments:

Caltrans acknowledges and supports mixed-use, infill development that prioritizes nearby transit service, like the proposed Specific Plan aims to facilitate. The primary goals of the FFTOD Specific Plan are in direct alignment with State-level sustainable transportation policy goals which seek to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG) emissions, 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, as well as achieving a reduction in statewide, per capita, vehicle miles traveled (VMT). Similar goals are embedded in the California Transportation Plan 2040, Draft California Transportation Plan 2050, and Southern California Association of Governments (SCAG) Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). 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

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more sustainable development. Projects, like the one proposed, can help California meet these goals.

There are two topics outlined in the NOP that should be addressed while developing the Draft Environmental Impact Report:

- 1) While Caltrans enthusiastically applauds the establishment and/or significant widening of sidewalks throughout the Plan area, this community benefit should not be primarily achieved through expanded right-of-way or private setback conditions. Improving safety and comfort for people walking or riding bicycles presents a rare opportunity to put existing road space to better use. When the extra space for sidewalks or bikeways is achieved through narrowing or eliminating car travel lanes, the bike- and walkability is further enhanced by calmed traffic and shorter crossing distances. These effects feed into one another, creating greater levels of comfort and allowing the area to become truly transit-oriented.
- 2) The decision to reduce or alter the amount of car parking required is a tremendous step in the right direction for this project to achieve its stated goals. Caltrans would encourage the lead agency to seriously consider taking this policy to its logical conclusion by eliminating parking requirements altogether. 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 as an alternative to building excessive car parking. By removing car parking requirements, this valuable and expensive space is exposed to the forces of the free market and creates an environment where only the car parking that is necessary will be built.

Caltrans looks forward to the forthcoming Draft Environmental Impact Report to confirm that the Project will result in a net reduction in Vehicle Miles Traveled.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2021-03522.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse