

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3574
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life*

July 17, 2024

Michael Sin
City of Los Angeles, Department of City Planning
200N. Spring Street, Room 667
Los Angeles, CA 90012

RE: Cornfield Arroyo Seco Specific Plan
(CASP) Update – Final Environmental
Impact Report (FEIR)
SCH #2021040206
GTS #07-LA-2021-04571
Vic. LA 5 PM 20.13
LA 110PM 25.5

Dear Michael Sin,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. The Proposed Project is an update of the existing CASP. The update includes new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production. The Proposed Project would strengthen the existing CASP's affordable housing requirements, including the recalibration of the CASP's existing incentive zoning system; establish a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; include provisions that facilitate the production of new 100% affordable housing and permanent supportive housing projects on public land; increase the zoning capacity for housing in targeted areas; and adopt a modernized zoning system based on the City's new modular Zoning Code. The Proposed Project would supersede the text, maps, and tables of the existing CASP, and will include the adoption of necessary revisions and any other amendments necessary to implement this update, including amendments to General Plan elements (such as the Framework Element), community plans, the Los Angeles Municipal Code (LAMC) Chapter 1 and Chapter 1A, specific plans, and other City ordinances.

After reviewing the FEIR, Caltrans has the following comments:

"Provide a safe and reliable transportation network that serves all people and respects the environment."

As stated in section 4.15 of the EIR, the Specific Plan may result in a significant impact via freeway queueing. Caltrans concurs that the document is programmatic and that no specific locations or mitigations can be identified at this time. Caltrans looks forward to reviewing individual projects as they are proposed to ensure that any significant safety impacts are adequately mitigated, and all concerns are addressed.

Caltrans acknowledges and supports mixed-use, infill development that prioritizes walking, biking, and transit. The Project's Goals to provide mixed-income affordable housing within preexisting neighborhoods, thereby maximizing existing transit infrastructure and proximity to destinations, is in 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).

In addition to the Goals and Policies already proposed, Caltrans recommends:

1. **Eliminating Car Parking Requirements:** Caltrans encourages the lead agency to seriously consider completely eliminating car parking requirements, or even implementing car parking maximums. 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. There is sufficient justification to consider eliminating parking requirements to promote affordability and achieve the project's goals. Caltrans also recommends that at least one long-term bicycle parking space be provided per residential unit, allowing residents to take advantage of the Plan's proposed multi-modal improvements and more easily choose the bicycle as their mode of travel. Long-term bicycle parking should be located onsite, indoors, on the ground floor, and within 200 feet of primary pedestrian entrances.
2. **Preparing for adaptive reuse:** Consider adopting Form-Based Codes (FBCs) as an alternative to use-based zoning. FBCs allow for a community's vision to be created and maintained through form, mass, and streetscape requirements, while allowing tremendous flexibility for adaptive reuse into the future. This reduces wasteful demolition of single-use developments and improves the public realm for residents and visitors alike.

3. **Protecting vulnerable road users:** The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.

Please note that an encroachment permit will be required for any project work proposed adjacent to Caltrans Right of Way and all environmental concerns must be adequately addressed. Any modifications to the State facilities will be subject to additional review by the Office of Permits prior to issuance of the permit. Any projects impacting State ROW will need to contact the Caltrans Office of Permits when project documents are finalized, and the applicant is ready to submit a permit application package.

Finally, Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through efficient and equitable land use planning and policies. If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS #07-LA-2021-04571.

Sincerely,



Anthony Higgins
Acting LDR Branch Chief

Cc: State Clearinghouse