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Governor's Office of Planning & Research

July 24 2023

STATE CLEARINGHOUSE

July 24, 2022

Erica G. Aguirre, AICP, Principal Planner
LA County Planning
320 West Temple Street
Los Angeles, CA 90012

RE: Griswold Residential Project – Draft
Environmental Impact Report (DEIR)
SCH# 2022020004
GTS# 07-LA-2022-04249
Vic. I-10 PM 35.227

Dear Erica G. Aguirre,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would demolish the existing vacant buildings on the site (the Griswold School) and associated accessory structures and develop the site with 68 detached residential condominium units. 179 parking spaces, including 68 two-car garages and 43 onsite guest parking spaces would be provided as part of the Project. Each home also includes a full driveway that can accommodate two additional vehicles. To the north of the Project Site, there is an existing six-foot-high concrete ("CMU") wall. The Project also includes new six-foot-high CMU walls on the western and eastern boundaries of the Project Site. There would be interior walls including six-foot-high CMU walls on proposed block edges and 5.5-foot-high vinyl fencing between units.

The nearest State facility to the proposed project is Interstate 10. After reviewing the DEIR, Caltrans has the following comments:

As stated in the Vehicle Miles Traveled (VMT) Analysis, the project will result in a significant and unavoidable environmental impact due to VMT per capita exceeding the City's adopted thresholds by 48%. Caltrans concurs that the project will result in a significant environmental impact but does not concur that is unavoidable.

This development continues the long-broken model of suburban sprawl with no substantive attempt to design in a way that enhances the community's resilience, sustainability, adaptability, health, or mobility. The fully separated, low-density, residential-only land use model has been proven to be an enormous financial liability, as the disproportionately high amount of land and infrastructure required to subsidize an entirely car-oriented lifestyle is simply not possible to maintain with public funds without major compromises to critical services and community well-being.

Currently the project is designed in a way that induces a high number of vehicle trips per household due to being an exclusively residential, car-oriented development. If you include the two driveway parking spaces in front of every garage, this project will be constructing 315 car parking spaces. This more than doubles the current parking requirements of 153, and this is already a completely unnecessary amount of parking to require. The Lead Agency is encouraged to integrate transportation and land uses in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. Caltrans recommends the following to more effectively address the significant VMT that this project creates as currently proposed:

- 1) Provide for a mixture of land use types within the Project's new zoning area to allow for adaptive reuse. This can allow goods, services, and jobs to be created closer to where the project's residents live.
- 2) Increase density, both vertically and horizontally. Land use developments, like the one proposed, should not be sprawled across huge areas of land. By bringing the built environment closer together, and building up instead of out, it becomes possible to greatly reduce energy use, improve walkability, allow for adaptive reuse, and generate real value for the community.
- 3) Reduce the amount of parking whenever possible, as 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 as an alternative to building too much parking.
- 4) Provide affordable housing units. These units can improve housing affordability and improve the life and health of all Californians as it should always be the goal of any civilized society to reduce the suffering of all people in our communities. Additionally, rates of car ownership and vehicle miles traveled (VMT) are significantly lower for low-income households than they are for high-income households. If the project included affordable housing, then there would be an even greater justification for reducing car parking to promote affordability and achieve a more diverse and sustainable land-use pattern.
- 5) Improve connections to existing active transportation and transit infrastructure. This can be done with robust signage, wayfinding, safety improvements, and human scale amenities. Additionally, 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. By working with Foothill Transit, the 190 Line could have its frequency increased or even upgraded to a Bus Rapid Transit (BRT) line with dedicated bus-only lanes. There could also be improved connections and wayfinding to the Metrolink Baldwin Park and Covina Stations.

Finally, 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 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-2022-04249.

Sincerely,



Miya Edmonson

LDR Branch Chief

cc: State Clearinghouse