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**Governor's Office of Planning & Research**

**March 18 2024**

**STATE CLEARINGHOUSE**

March 18, 2024

Troy Evangelho  
City of Culver, Advance Planning Division  
9770 Culver Boulevard, Culver City, CA 90232

RE: Picture Culver City: General Plan  
2045 – Recirculated Notice of  
Preparation (NOP)  
SCH #2022030144  
GTS #07-LA-2024-04459  
Vic. LA 10, 405, 90, 1 PM Multiple

Dear Troy Evangelho,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. An NOP was previously circulated for the preparation of the EIR for the General Plan Update. However, to maintain compliance with the recently adopted 2021-2029 Housing Element and to comply with state law, Culver City is expanding the scope of this project to include a Zoning Code Update, which implements the Housing Element and proposed General Plan Update. The City of Culver City is comprehensively updating its general plan to respond to the changing needs and conditions of the city and region and to reflect new state laws. The General Plan 2045 consists of the following 13 elements; Land Use and Community Design; Mobility; Housing; Noise; Conservation; Safety; Community Health and Environmental Justice; Governance and Leadership; Arts, Culture, and Creative Economy; Economic Development; Parks, Recreation, and Public Facilities; Greenhouse Gas Reduction; and Infrastructure.

Culver City is also updating its zoning code to implement the land use patterns and development framework defined in the General Plan and Housing Element Updates. Changes include revisions to existing zoning districts, new zoning districts and development standards, updated uses to be permitted in each district, and an updated zoning map consistent with the General Plan land use designations. The Zoning Code Update will also update the processes and procedures to be consistent with the General Plan and Housing Element Updates and recent changes to state law.

After reviewing the RNOP, Caltrans has the following comments:

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

Transportation and housing are integrally connected. The Housing Element Update process provides a mechanism to reflect current transportation and land use policy and adopt efficient land-use strategies such as transit-oriented, infill and mixed-use developments that can potentially reduce vehicle miles traveled and address climate change.

Please review and reference the current California Transportation Plan (CTP) in the DEIR. CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050.

The scope and nature of this General Plan and Zoning update provides a valuable opportunity to apply proven policies that improve walkability, reduce automobile dependence, and provide a path to housing affordability. Caltrans recommends the following:

- Eliminate car parking requirements. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a city's ability to encourage public transit and active modes of transportation. The city should instead use this valuable space as an opportunity to build residential, commercial, and office uses in close proximity, thus increasing accessibility and allowing residents to utilize both transit and active modes to meet their everyday transportation needs. To reduce vehicle miles traveled, we recommend eliminating car parking requirements, or even implementing parking maximums, as alternatives to building an unnecessary amount of parking.
- Prepare for adaptive reuse. Consider adopting Form-Based Codes (FBC) as an alternative to separating uses. 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.
- Connect to transit infrastructure. Culver City is in a centralized location with many potential connections to local and regional transit. Investments should be made to connect all areas of the city to the robust existing network of transit stops and

stations. Streetscape and transit stop investments can dramatically improve walkability and encourage transit use.

- Protect 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.
- Caltrans recommends the City of Culver City to prioritize bicycle and pedestrian facilities and infrastructure in their General Plan and Zoning Code update. This can promote healthier lifestyles and increase recreational biking, among other benefits. Amending the zoning code to include bicycle and pedestrian facilities and infrastructure for new development can contribute to a more connected active transportation network. Active transportation infrastructure can also play a vital role in addressing goals or policies in the Safety, Equity, Community Health, Climate Change and Sustainability, and Infrastructure Elements. Caltrans encourages the city to refer to federal or state guides or plans for complete street/active transportation elements and infrastructure.

In addition to the above recommendations, Caltrans looks forward to reviewing the DEIR's Transportation Impact Analysis including, but not limited to, the following:

1. A robust VMT Analysis.
2. Multi-Modal (Pedestrians, Bicyclists, Transit, Trucks, Cars etc) Conflict Analysis at all locations within the general plan that interact with Caltrans ROW, and specifically identify the physically protective infrastructure needed for people walking, riding bikes, and using transit.
3. Mitigation measures that include:
  - a) Reducing car infrastructure and parking.
  - b) Enhancing bicycle and pedestrian infrastructure.
  - c) Enhancing transit infrastructure.
  - d) Transportation Demand Management (TDM) measures.
  - e) Transportation System Management (TSM) investments.

Caltrans looks forward to reviewing the DEIR that should demonstrate how the future housing development patterns align with adopted VMT policies. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through efficient and equitable land use

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planning and policies. If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS #07-LA-2022-04459.

Sincerely,

*Miya Edmonson*

Miya Edmonson  
LDR/CEQA Branch Chief

Cc: State Clearinghouse