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Governor's Office of Planning & Research

December 11 2023

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STATE CLEARINGHOUSE

Tamar Gharbian
Department of City Planning
City of Los Angeles
221 N. Figueroa St., Room 1350
Los Angeles, CA 90212

RE: Fourth & Central Project
SCH # 2022030295
Vic. LA-10/PM 17.12, LA-101/PM S0.62
LA-05/PM 17.56, LA-110/PM 23.12
GTS # LA-2022-04342-DEIR

Dear Tamar Gharbian:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project would demolish the existing surface parking and cold storage facility uses on the West and South Sites. The Project intends to adaptively reuse a portion of a six-story cold storage warehouse building located on the North Site, while demolishing the remaining attached single-story warehouse building on the North Site.

The Project would include a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the Project Site totaling 2,318,534 sf, for a floor area ratio (FAR) of 7.13:1. The Project would include: 1,521 residential units, including affordable housing units, totaling 1,731,849 sf; 411,113 sf of office uses; 101,088 sf of restaurant/retail uses¹; and 68 hotel rooms (74,484 sf of hotel floor area). The Project would include 163,325 sf of Los Angeles Municipal Code (LAMC) required usable open space.

In addition, the Project would include 90,113 sf of publicly accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The proposed buildings would range in height from 2 to 44 stories, with a maximum height of 497 feet. The Project would provide 2,475 vehicle parking spaces within subterranean parking (up to four levels). The Project would also provide 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces.

Caltrans is aware of the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

Mobility Plan

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. The Mobility Plan combines “complete street” principles as evaluated in detail in with the following five goals:

1. Safety First
2. World Class Infrastructure
3. Access for all Angelenos
4. Collaboration, Communication, and Informed Choices
5. Clean Environments and Healthy Communities.

The Project would provide a 6-foot dedication along the 4th Street ROW and a 5-foot center line adjustment (a total of 11 feet) to meet the Mobility Plan’s 86-foot standard for Avenue II ROW and 28-foot street width. The Project would provide a 10-foot dedication along the Alameda Street ROW to meet the Mobility Plan’s 50.5-foot standard for Avenue I ROW and 35-foot street width. Overall, the Project would promote active transportation modes and would not conflict with any of the applicable goals, policies or programs in Mobility Plan 2035 adopted to protect the environment.

Transit

The Project Site is located within a Transit Priority Area (TPA). The Project Site is located approximately 0.40 miles south of the underground-level Metro L Line (formerly Gold Line) Little Tokyo/Arts District Station at Central Avenue & 1st Street. The Project is located adjacent to numerous bus stops including Metro 18, 30, 53, 60, 62, 720, LADOT Dash A, Montebello Bus Line M40, and Metro Rail L.

Bicycle

In the vicinity of the Project Site, existing bicycle lanes are provided on 3rd Street between San Pedro Street and Santa Fe Avenue, 5th Street west of Central Avenue, and Mateo Street between Santa Fe Avenue and 6th Street. 1st Street and 2nd Street west of Santa Fe Avenue have been designated as bicycle routes. The Project would provide short-term and long-term bicycle parking throughout the Project Site that would support “first-mile, last-mile solutions” and enhance the multi-modal connectivity and access for transit riders. Again, the Project would also provide 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces.

Pedestrian

The Project would enhance pedestrian access within and around the Project Site by providing improvements to the sidewalks, landscaping, and pedestrian safety measures within the Project and along the Project frontages. The signalized intersections surrounding the Project Site provide pedestrian phasing, continental crosswalk striping, and Americans with Disabilities Act (ADA) accessible ramps. The Project would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities with separate pedestrian and vehicle access points and active street frontages. LADOT recommends the project consider the installation of a pedestrian mid-block crossing signal on 4th Street between Alameda Street and Merrick Street to improve pedestrian access in the area if the pedestrian signal is warranted.

VMT

The project proposes to incorporate the TDM strategies of reduced parking supply, parking cash-out, bicycle share station, and bike parking per LAMC. With the application of these TDM measures, the proposed project is projected to have a Household VMT of 3.9 and a Work VMT of 6.5 which is lower than the thresholds of Household VMT per Capita 6.0 and Work VMT per Employee 7.6. Therefore, it is concluded that implementation of the proposed project would not result in a significant VMT impact.

These TDM measures should be part of the project description or development agreement between the developer and the Lead Agency based on page IV.J-25 of the DEIR, “the VMT Calculator measures the reduction in VMT resulting from a project’s incorporation of TDM strategies as project design features or mitigation measures.” Otherwise, there should be VMT disclosures before and after TDM measure implementation.

TDM

The project proposed the following TDM program to implement:

- Reduced Vehicle Parking Supply – The Project would provide less on-site vehicle parking than the amount required by the direct application of LAMC parking rates, without consideration of allowable parking reduction mechanisms. A reduced

parking supply makes parking less available and, therefore, encourages the use of non-automobile modes to and from the Project Site and reduces VMT.

- Bicycle Parking in Accordance with LAMC requirements – The project would provide bicycle parking spaces in compliance with the requirements of the LAMC.
- Parking Cash-Out Program – The Project would comply with the state parking cash-out law, which requires employers who provide subsidized parking to offer employees a cash allowance in lieu of a parking space.
- Bicycle Share Station – The Project would also provide a bicycle share station in order to support first-mile/last-mile service for transit users and reduce reliance on personal automobiles.
- Record a Covenant and Agreement to ensure that the TDM program will be maintained.
- Contribute a one-time fixed fee contribution of **\$150,000** to be deposited into the City's Bicycle Plan Trust fund to implement bicycle improvements in the vicinity of the project.
- Contribute a one-time fixed fee contribution of **\$75,000** to be deposited into the City's Mobility Trust fund to implement improvements in the vicinity of the project.

In addition to the proposed TDM, we encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

Freeway Safety Analysis

Based on the Project's trip generation estimates and traffic distribution pattern, the following off-ramps were analyzed

- US 101 Northbound Off-Ramp to 4th Street
- US 101 Southbound Off-ramp to Los Angeles Street
- I-5 Northbound Off-Ramp to 7th Street
- I-5 Southbound Off-Ramp to 4th Street
- I-10 Eastbound Off-ramp to Central Avenue
- I-10 Eastbound Off-ramp to Alameda Street

Based on the City's guidelines under Future with Project Conditions, the queues at off-ramps would not exceed the ramp storage length during any of the analyzed peak hours and would not cause a significant safety constraint. However, for the off-ramp at US-101 and North at 4th Street, the Future with Project conditions is 733 feet which is very close to the ramp storage length of 820 feet. This is less than 4 vehicle lengths (25 feet/vehicle)

away to trigger a safety constraint. We would like the Lead Agency to be aware of this issue and be prepared to work with Caltrans in the future to avoid this traffic safety concern.

Others

On page IV.J-35 of the DEIR states “Should implementation of the selected TDM measures become infeasible for the project, substitute TDM measures would be implemented that would be equivalent or superior in reducing vehicle trips and VMT.” This statement should be part of the development agreement and the Lead Agency should be aware that No TDM measures will guarantee desired/actual Project VMT.

In order for the Lead Agency to determine if the TDM is feasible and the Project VMT is within thresholds for this large project in Downtown Los Angeles, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be prepared. Additional mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the City’s VMT traffic model results.

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant traffic impacts.

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods. Any debris on the construction truck must be covered by a tarpaulin cover.

Due to the recent I-10 bridge fire on Caltrans facilities, bridge column repairs are still ongoing. Some of the streets connecting to Alameda Street on/off-ramp are temporary restripe to one-way (14th Street). Caltrans recommends that trucks hauling building materials or dirt to/from the project site avoid using Alameda Street to access I-10. The duration for the structure columns repair is unknown at this time.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2022-04342-DEIR.

Tamar Gharbian
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Sincerely,

Frances Duong

FRANCES DUONG
Acting LDR/CEQA Branch Chief

email: State Clearinghouse