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October 2, 2024

Jason McCrea
City of Los Angeles
Department of City Planning
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012

RE: Mirabel Transit Priority Project
Draft Environmental Impact Report
(DEIR) SCH # 2023080791
Vic. LA-010/PM: R10.742
GTS # 07-LA-2023-04613

Dear Jason McCrea:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The Project involves the construction of a 42-story mixed-use tower, comprised of 348 dwelling units, including 29 units set aside for Very Low-Income households, and 12,821 square feet of ground floor commercial uses. The Project would remove approximately 38,545 square feet of existing commercial uses, including the existing commercial building at 5401 Wilshire Boulevard, which is a contributor to the Miracle Mile Historic District. However, the east and south façades of the existing historic commercial building would be preserved in place, rehabilitated, and incorporated into the Project. Parking would be provided in three above-ground and three subterranean levels. The Project would include a total floor area of 476,777 square feet on an 57,374 square foot lot (1.32 acres). The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

Caltrans acknowledges and supports infill development that helps California meet its climate, transportation, and livability goals. The Project would develop on an infill location with convenient access to public transit and opportunities for walking and biking, which would result in a reduction of vehicle trips, VMT, and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by Metro and LADOT DASH lines. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage residents and employees of the Project Site to walk, bike and take transit to nearby destinations.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development 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 recommends the following to further improve the urban design and minimize reliance on personal cars and trucks:

Reduce the amount of vehicle parking. 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.

While the project is located in an amenity rich area, the 478 parking spaces proposed unnecessarily induce demand for vehicle trips. Research shows rates of car ownership and vehicle miles traveled (VMT) are significantly lower for low-income households, and since this project proposes to set aside 29 units for very low-income households, there is additional justification to consider reducing the amount of car parking being built to promote affordability and achieve project goals.

Additionally, with the implementation of AB 2097 this project is not required to include car parking, but the proposed design suggests that the Lead Agency should seriously consider adopting parking maximums. This project's location is an excellent candidate for reduced car parking due to it being an infill location within a high-quality transit corridor.

Caltrans also encourages the Lead Agency to actively promote alternatives to car use and consider transportation demand management strategies. Such alternatives include incentives for commuters to use transit, discounts on monthly bus and rail passes, shuttle buses, vanpools, etc. These alternatives can be significant to reducing car trips, to the extent that more of the population shifts to transit for some of their inter-regional trips and thus future cumulative transportation impacts to freeways may be satisfactorily mitigated.

Here are some additional notes on Appendix D-2:

#	Location	Note
1	Appendix D-2: "Future Forecast (Year 2024)" (Page 24)	The future forecast is shown for 2024, which is now insignificant to the current study. Also, please note the page is missing content.

If you have any questions, please feel free to contact Karen Herrera, the project coordinator, at Karen.Herrera@dot.ca.gov and refer to GTS # 07-LA-2023-04613.

Sincerely,



Anthony Higgins
Acting LDR/CEQA Branch Chief

cc: State Clearinghouse