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

March 14, 2024

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

RE: Fox Future Project – Notice of Preparation (NOP)
SCH #2024020502
GTS #07-LA-2024-04453
Vic. LA 10 PM 6.462
LA 405 PM 30.87

Dear Rey Fukuda,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. The FOX FUTURE Project (Project) proposes 2,092,348 square feet of new construction within the CCS Specific Plan area consisting of new studio uses, general office uses, and supporting facilities, as well as parking facilities, circulation improvements, landscaping, and open space amenities. As part of the Project, a total of 465,507 square feet would be demolished, including 460,998 square feet within the CCS Specific Plan and 4,509 square feet within the Pico Properties. A total of 1,344,058 square feet of existing floor area would be retained within the CCS Specific Plan, of which 50,482 square feet would be adaptively reused, while a total of 9,235 square feet would be retained and adaptively reused within the Pico Properties. Development at Project buildout would total 3,445,641 square feet, of which 3,436,406 square feet would be located within the CCS Specific Plan, and 9,235 square feet within the Pico Properties.

After reviewing the NOP, Caltrans has the following comments:

While the Fox Future Project does discuss some multi-modal options for employees and visitors, it will also be constructing a net increase of 4,894 new car parking spaces, bringing the on-site total car parking to 9,394 spaces. This is a seriously consequential amount of car-only infrastructure that encourages and accommodates only motor-vehicle trips to the project site. As designed, the Project has a high potential for inducing demand

for additional vehicle trips, and therefore, Vehicle Miles Traveled (VMT). This demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

- Reducing the amount of parking whenever possible. 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. The project could instead use this valuable space as an opportunity to build additional land-use types, as the essential component of sustainable communities is mixed-use zoning. Residential, Commercial, and Office uses should be intertwined to increase accessibility and allow residents to utilize both transit and active modes to meet their everyday transportation needs. 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 an unnecessary amount of parking.

- Prepare for adaptive reuse. If the parking infrastructure must be built, it should be designed in a way that is conducive to adaptive reuse. They should contain flat floors with ramps on the exterior edge, so that they can be more easily converted to more beneficial uses in the future.

- Connect to transit infrastructure. This project is in a centralized location with many potential connections to local and regional transit. Investments should be made to connect this project to the nearby Metro E Line Westwood/Rancho Park Station, forthcoming Metro D Line Century City/Constellation station, and the numerous bus transit stops surrounding the project. Streetscape and transit stop investments can dramatically improve walkability and encourage future 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.

For the forthcoming DEIR, Caltrans looks forward to reviewing the Transportation Impact Analysis including, but not limited to, the following:

1. A robust VMT Analysis.

2. If vehicle queuing at off-ramps will trigger a Freeway Safety Analysis (based on the Interim Guidance for Freeway Safety Analysis issued by the Los Angeles Department of Transportation on May 1, 2020). Caltrans asks that the following interchanges be included in the analysis:
    a) Interstate 10/National Blvd/ Overland Ave.
    b) Interstate 10/Manning Ave/Palms Blvd.
    c) Interstate 10/La Cienega/Venice Blvd.
    d) Interstate 10/Robertson Blvd/National Blvd

3. Multi-Modal (Pedestrians, Bicyclists, Transit, Trucks, Cars etc) Conflict Analysis at the above stated locations

4. 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.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS #07-LA-2024-04453.

Sincerely,

Miya Edmonson

Miya Edmonson
LDR/CEQA Branch Chief

Cc: State Clearinghouse