

**DEPARTMENT OF TRANSPORTATION**

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December 11, 2024

Crystal Arroyo, Assistant Planner  
City of Whittier Community Development Department  
13230 Penn Street  
Whittier, CA 90602

RE: Comstock Place Townhouse  
Project– Mitigated Negative Declaration  
(MND)  
SCH #2024110306  
GTS #07-LA-2024-04687  
LA-72/PM 4.84

Dear Crystal Arroyo,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes the consolidation of six parcels into a single 0.826 gross acre lot to facilitate development of the Comstock Place Townhouse Project. The site development plan (DRP24-0011) envisions two structures with varied dimensions along the frontage of Comstock Avenue and Philadelphia Street. The Project provides 59 parking spaces. Each individual townhouse will be equipped with a garage that will each contain 2 parking spaces (for a total of 48 garage spaces) and 7 resident spaces. The Project is required to file for a Variance to allow the use of 8 tandem parking garages as the Uptown Whittier Specific Plan (UWSP) does not allow tandem parking. The site plan proposes incorporating 8 tandem parking garages out of 24 garages. Additionally, 4 guest parking spaces will be provided, which includes 1 accessible space in compliance with the American Disabilities Act (ADA).

As stated in the Initial Study, the variances would allow for tandem garages to create more efficient parking capabilities within the small site and allow for more flexible parking in light of the small site constraints. These variances are primarily parking related, and the variances are justified by the fact that the proposed project is located in a low vehicle miles traveled (VMT) area because the project site is located in an area 15% below the City average daily home based VMT per capita. Furthermore, the enablement of these variances would further aid the City in meeting Southern California Association of

Governments (SCAG) Regional Housing Needs Assessment (RHNA) requirements.

After reviewing the MND, Caltrans has the following comments:

Caltrans supports measures to reduce the land area required for parking spaces in traditional side-by-side configurations. Tandem parking frees up space for additional housing units, green spaces, or other community amenities, aligning with State goals to meet regional housing targets and encourage walkable, livable neighborhoods.

The City of Whittier's Bicycle Transportation Plan identifies goals for enhancing the bike network and its connectivity with the Whittier Greenway Trail. The MND states that Comstock Avenue north of Mar Vista Street will be a Class III designated bike route. Per SB-1216, the use of Class III bike routes within residential streets, like Comstock Avenue, that contain a speed limit of 30 miles per hour is acceptable. It is advised that the City consider traffic calming treatments along Comstock Avenue to enhance the proposed bicycle route. Extending out from this specific project, Caltrans recommends focusing on installing Class IV separated bikeways and Class II buffered bicycle lanes, or unbuffered bicycle lanes as a secondary option, within the main city streets and avenues to increase the safety of riders. It is also recommended that the City upgrade their conflict and intersection zones with green paint to designate the bicycle path of travel.

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will require a Caltrans transportation permit. Caltrans recommends limiting construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review. We look forward to the coordination of our efforts to ensure potential impacts to the highway facilities and traveling public are discussed and addressed before work begins.

If you have any questions, please contact project coordinator Frances Duong, at frances.duong@dot.ca.gov and refer to GTS #07-LA-2024-04687.

Sincerely,

*Anthony Higgins*  
Anthony Higgins  
Acting LDR Branch Chief

Cc: State Clearinghouse