

DEPARTMENT OF TRANSPORTATION

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a California Way of Life*

April 30, 2025

Tamar Gharibian
Department of City Planning
City of Los Angeles
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: 3822 South Figueroa Project
SCH # 2025040334
Vic. LA-110/PM 19.49 to LA-110/PM 20.0
GTS # LA-2025-04785-NOP

Dear Tamar Gharibian:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The 3822 South Figueroa Project (Project) proposes a new seven-story, mixed-use building comprised of 209 dwelling units (including 16 units for Low-Income households, 22 units for Very Low-Income households, and four units for Extremely Low-Income households); and 2,705 square feet of ground level retail and restaurant uses. The Project would have a maximum building height of 86 feet, and a total floor area of 252,148 square feet on a 62,989 square-foot (1.4-acre) site, for a Floor Area Ratio (FAR) of 4:1. The Project involves the demolition of eight multi-family residential buildings.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<https://opr.ca.gov/ceqa/#guidelines-updates>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

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, 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 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.

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>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review the SB 743 Implementation Resource at the following link:

<https://dot.ca.gov/programs/esta/sb-743/resources/>

We acknowledged that the Draft Environmental Impact Report (DEIR) will describe the transportation and circulation implications of the proposed project, including its incremental contribution to daily and peak hour traffic on local and regional roadways. The evaluation will include roadway system impacts, transit implications, and effects on pedestrian and bicycle circulation related to general plan consistency. Vehicles Miles Travelled (VMT) will also be analyzed.

Based on the size of the project, distance to the State facilities, and potential safety impact from the assigned project trips, the following interchanges could be impacted by the proposed plan/development:

- a. I-110/E Martin Luther King Jr. Blvd.
- b. I-110/Exposition Blvd.

For the above State facilities, Caltrans would like to review traffic safety impact analysis (such as queuing analysis) for this development in the California Environmental Quality Act (CEQA) review process using Caltrans guidelines on the State facilities so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

A queuing analysis should be conducted to ensure there are no safety-related impacts. This analysis should evaluate off-ramps to confirm that vehicle queues do not extend onto the mainline, which could compromise freeway safety and traffic flow. Additionally, turning pockets at intersections should be assessed to verify that queue lengths do not exceed available storage capacity, preventing potential spillover that could obstruct through traffic. Existing signal timing should be used for the Existing condition.

If the project is expected to generate pedestrian and/or bicycle activity, a multi-modal conflict analysis should be performed. This analysis should evaluate potential conflicts between various transportation modes, including biking, walking, bus, and transit, to ensure safe and efficient integration of all users within the project area.

The project should incorporate Complete Streets elements to enhance accessibility and safety for all users. These improvements should include ADA-compliant curb ramps, continuous sidewalks, dedicated bike lanes, high-visibility crosswalks, Accessible Pedestrian Signals (APS), and Leading Pedestrian Intervals (LPI) where applicable.

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If the project is determined to have significant transportation impacts, appropriate mitigation measures should be implemented. These may include Transportation Demand Management (TDM) strategies to reduce single-occupancy vehicle trips and encourage alternative transportation modes, as well as Transportation System Management (TSM) improvements to optimize traffic flow and enhance the efficiency of existing transportation infrastructure.

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-2025-04785-NOP.

Sincerely,



Miya Edmonson
LDR Branch Chief

Cc: State Clearinghouse