



**Draft EIR Comment Letters** 

## DEPARTMENT OF TRANSPORTATION

DISTRICT 7- OFFICE OF REGIONAL PLANNING 100 S. MAIN STREET, SUITE 100 LOS ANGELES, CA 90012 PHONE (213) 266-3574 FAX (213) 897-1337 TTY 711 www.dot.ca.gov



July 31, 2020

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

RE: 2143 Violet Street Project - Draft

Environmental Impact Report (DEIR)

Vic. LA-101 PM 00.043 Vic. LA-5 PM 16.974 Vic. LA-60 PM 00.654 Vic. LA-10 PM 17.838

SCH# 2018051050

GTS# 07-LA-2018-03289

## Dear Rey Fukuda,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project would develop 347 new live-work units, 187,374 sq. ft. of new office space, 21,858 sq. ft. of new retail/restaurant floor area, and 926 sq. ft. of artist production amenity space. The new uses would be located in a 15-story building with a maximum height of 179 feet. Five existing buildings that comprise approx 56,686 sq. ft. would be retained with office, retail, restaurant, warehouse, and live-work units. Two existing buildings containing 4 live work units, and 2 open sheds would be removed. Upon completion, up to 569,448 sq. ft. of floor area would be located within the project site, including the existing floor area to remain, resulting in a maximum FAR of 6.0:1. The project would also provide 828 vehicular parking spaces and 257 bicycle parking spaces (47 short-term and 210 long-term) within six subterranean parking levels.

The nearest State facilities to the proposed project are US 101, I-5, SR 60, and I-10. After reviewing the DEIR, Caltrans has the following comments:

Caltrans acknowledges and supports infill development that prioritizes nearby transit service, promotes active transportation, and provides a mixture of land uses that keeps the goods and services people need in close proximity to where they work and live. Caltrans commends the Project's inclusion of bike parking, new sidewalks and street trees, pedestrian scale lighting, unbundled motor-vehicle parking, and a commute trip reduction program for onsite workers. The

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inclusion of these measures has mitigated the work vehicle miles travelled (VMT) per employee to a level of less than significant.

However, there is still room for improvement, as the DEIR has stated that there is still a significant household VMT impact when compared to LA's adopted VMT thresholds for the Central LA APC Area. Caltrans believes that due to the amount of motor vehicle parking being provided, the 2143 Violet Street Project is still designed in a way that induces demand for additional vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. 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. Housing affordability can also be improved by not building an unnecessary amount of very expensive, subterranean parking.

Caltrans also recommends that at least one long-term bicycle parking space be provided per residential unit, allowing residents to more easily take advantage of the project's central location and choose the bicycle as their mode of travel. Long-term bicycle parking should be located onsite, on the ground floor, and within 200 feet of the pedestrian entrance to the main building.

Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2018-03289.

Sincerely,

MIÝA EDMONSON

IGR/CEQA Branch Chief

Miya Edmonson

cc: Scott Morgan, State Clearinghouse



## Rey Fukuda <rey.fukuda@lacity.org>

## **Environmental Case NO: ENV-2017-438-EIR**

London Kaye <londonkaye@gmail.com> To: rey.fukuda@lacity.org

Fri, Jul 24, 2020 at 1:24 PM

Hello Mr. Fukuda,

I am a resident at 726 S Santa Fe and received a surprising letter a few weeks ago. I must say I do not approve of the construction in Environmental Case NO: ENV-2017-438-EIR. I have a live/work loft that looks out over where the construction project will be and have recently renewed my lease back on June 1st for another year (prior to receiving this letter.) As you might imagine, with Covid-19 I am working from home. My job requires filming video and teaching students regularly at home. With significant and unavoidable Construction Noise and Vibration, I will not be able to do my job. Please let me know if there is any more information you can share in terms of the timeline for the project because I will have to move if construction begins. If that happens, I would kindly ask for all moving expenses and any broken lease agreement penalties to be paid for by ONNI Capital LLC. I hope you understand my concern.

Thank You,

London O'Donnell