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MAR 02 2020

STATE CLEARINGHOUSE

March 2, 2020

Iris Wan
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 620/621
Los Angeles, CA 90012

RE: 3440 Wilshire Project – Mitigated Negative
Declaration (MND)
GTS # 07-LA-2020-03152
SCH # 2020029004
Vic. LA-101/PM: 4.343

Dear Iris Wan:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced MND. The mixed-use 3440 Wilshire Project involves the development of up to 640 residential units, 10,738 square feet of commercial floor area, 1,921 vehicle parking spaces, and 1,840 bicycle parking spaces. The City of Los Angeles is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 1.65 miles north of Interstate 10 (I-10) and approximately 1.3 miles south of the United States 101 (US-101) Freeway.

After reviewing the MND, Caltrans requests more information about how the trip distribution percentage of 7.5% to the US-101 at Normandie Avenue intersection was determined. Caltrans acknowledges that this percentage is based on the overall project trip distribution patterns displayed in Figure 5 of the Transportation Impact Analysis (TIA), which shows that 20% of project will travel north of the project site. We also concur with the following statements in the TIA: "The geographic distribution of trips generated by the proposed project is dependent on characteristics of the street system serving the project site; the level of accessibility of routes to and from the proposed project site; locations of employment and commercial centers to which residents of the project would be drawn; and residential areas from which the retail employees and other commercial visitors would be drawn. A select zone analysis was conducted for the proposed uses using the City of Los Angeles' Travel Demand Model to inform the general distribution pattern for this study." However, Caltrans would like more details about how the 7.5% figure was derived from the 20% figure.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the infill nature of this project and the TDM strategies it has incorporated, such as providing 1,840 bicycle parking spaces. Additional TDM strategies that the City of Los Angeles may want to consider integrating into this

project include:

- Decrease the amount of single occupancy vehicle parking by replacing those spaces with more carpool and bicycle parking
- Ensure that the provided short term bicycle parking is secure
- Confirm that the parking structure entrances/exits are pedestrian-friendly by setting them back from the sidewalk to increase pedestrian visibility
- Provide bicycle facilities to connect the bicycle facilities on 7th Street and Oxford Avenue
- Create a transit shelter at the Normandie/Wilshire Metro stop located on the west side of Irolo Street
- Increase the visibility of crosswalks and install ADA compliant curb ramps at the Wilshire Boulevard & Mariposa Avenue intersection, as well as the 7th Street and Mariposa Avenue intersection

Please make every attempt to reduce VMT. For additional TDM options that can reduce VMT, refer to:

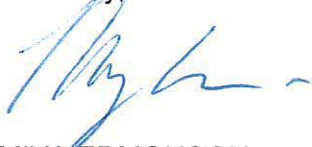
- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. If construction traffic is expected to cause delays on State facilities, please submit the Construction Traffic Management Plan detailing these delays for Caltrans' review. We support implementing the following proposed strategy in this plan: "Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible." Caltrans recommends that all large size truck trips in general be limited to off-peak commute periods.

Finally, since there are several schools located near the project, such as Angeles College and Los Angeles High School of the Arts, Caltrans recommends that during construction safety precautions for pedestrians and cyclists be implemented. Examples of precautions include using truck routes that avoid going past nearby schools and setting up protective barriers along pedestrian and cyclist routes. These measures are particularly important to implement along identified Los Angeles Unified School District pedestrian routes to nearby schools.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2020-03152.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse