DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

Jun 15 2022

STATE CLEARINGHOUSE

June 15, 2022

Los Angeles County Dept. of Regional Planning 320 W. Temple Street, 13th Floor Los Angeles, CA 90012 Attn: Jolee Hui

> RE: West LA Commons Project - Notice of

> > Preparation (NOP) SCH# 2022050406 GTS# 07-LA-2022-03947

Vic. LA-2 PM 3.429

Dear Jolee Hui.

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes to redevelop the existing West Los Angeles Civic Center and West Los Angeles Courthouse with a new mixed-use development consisting of 926 residential units (495 market-rate and 431 incomerestricted), neighborhood-serving commercial (retail/restaurant), municipal office, senior/community center uses. The proposed uses would be located within nine new structures with a total of 1,563 vehicle parking spaces located within a three-level subterranean parking garage.

The nearest State facilities to the proposed project are SR 2 and I-405. After reviewing the NOP, Caltrans has the following comments:

Caltrans acknowledges and supports infill development that helps California to meet its climate, transportation, and livability goals. However, due to the amount of car parking, the West LA Commons Project still induces demand for additional vehicle trips. For California to achieve its goals, this demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

- Reducing the amount of parking whenever possible, as 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.
- Rates of car ownership and vehicle miles traveled (VMT) are lower for low-income households than they are for high-income households. Seeing as this project includes

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income-restricted housing and multiple senior community uses, this should be taken into serious consideration. There is sufficient justification to significantly reduce the amount of car parking proposed, or at minimum, fully unbundle the car parking from residential units to promote affordability and achieve the project's goals.

Finally, the north end of the Project area is directly abutting Caltrans Right-of-Way. The project scope includes modifications to State facilities which will require collaboration, reviews, approvals, and encroachment permits so that all concerns can be adequately addressed. These will be conducted at the time of permit application, but preliminary comments can be provided if an attachment is included with the forthcoming DEIR that includes detailed technical drawings of all proposed changes to Caltrans Right-of-Way along SR 2 (Santa Monica Boulevard).

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2022-03947.

Sincerely,

MIYA EDMONSON

IGR/CEQA Branch Chief

Miya Edmonson

cc: Scott Morgan, State Clearinghouse