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October 23, 2019

Tina Fung  
Principal Regional Planner  
Department of Regional Planning  
County of Los Angeles  
320 West Temple Street  
Los Angeles, CA 90012

RE: Compact Lot Subdivision Ordinance  
Negative Declaration (ND)  
SCH# 2019089108  
GTS# 07-LA-2019-02801  
Vic. LA County

Dear Ms. Fung:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is an ordinance amendment to the Los Angeles County Code, Title 21 (Subdivisions) and Title 22 (Planning and Zoning), to allow the creation of smaller fee-simple, single-family residential lots in multi-family residential zones (Zones R-2, R-3, and R-4). The single-family residential lots, or compact lots, created through the ordinance amendment will be less than the typical minimum area of 5,000 square feet and minimum lot width of 50 feet. No more than eight cumulative compact lots will be allowed to be created on a parcel. The goal of the ordinance amendment is to create opportunities for affordable homeownership, and to promote urban infill development, a diversity of housing types, and neighborhood stability in the unincorporated areas of Los Angeles County.

The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).

If future developments are proposed to be developed after the implementation of SB-743, the analysis of traffic impacts must use Vehicle miles traveled (VMT) as a metric. The Los Angeles County Department of Regional Planning, as the lead agency has discretion to develop and adopt its own or rely on thresholds of significance recommended or used by other agencies.

After reviewing the Negative Declaration (ND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. However, in order to

further assess future impacts, Caltrans looks forward to reviewing the proceeding CEQA documents related to the specific project developments in the Ordinance Amendment.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future developments 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 encourages the Lead Agency to consider any reduction in vehicle speeds in order to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. Such methods include the construction of physically separated facilities such as Class IV bike lanes, sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and striping should be used to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications 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). A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or TDM is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

As a reminder, 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 Mr. Carlo Ramirez, at [carlo.ramirez@dot.ca.gov](mailto:carlo.ramirez@dot.ca.gov) and refer to GTS# 07-LA-2019-02801.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

Cc: Scott Morgan, State Clearinghouse