

California Department of Transportation

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February 11, 2026

Lauren De La Cruz, Senior Planner
LA County Planning
Ordinance Studies Section
320 West Temple Street, Floor 13
Los Angeles, CA 90012

RE: Los Angeles County events Ordinance
Project No. PRJ2025-001541: Ordinance No.
RPPL2025001715: Environmental Plan No.
RPPL2025005389
SCH # 2026010722
Vic. LA-Countywide
GTS # LA-2026-05004-NOP

Dear Lauren De La Cruz:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The County of Los Angeles Department of Regional Planning (LA County Planning) staff has prepared the Events Ordinance to codify and update guidance from the 2016 Subdivision and Zoning Ordinance Interpretation memorandum; provide clear definitions and standards for event facilities and special events; identify appropriate zones where event facilities may be considered with discretionary review; clarify when event activity is a primary use or a temporary special event; and align event-related regulations with other Zoning Code provisions.

Specifically, the Events Ordinance would: (1) modify Division 2 (Definitions) of the Zoning Code to add and clarify terms related to event activities; (2) add event facilities to several Division 3 (Zones) use tables as a conditionally permitted use in specified base zones, as well as in selected zones within the Santa Monica Mountains Local Implementation Program and various specific plans; (3) add a new "Event Facilities" section within Division 7 (Standards for Specific Uses), establishing development, operational, and management standards for event facilities; (4) revise Chapter 22.188, Special Event Permits to define and regulate short-term and extended-term special events, clarify procedures and findings, and strengthen enforcement provisions; and (5) make conforming changes elsewhere in the Zoning Code to ensure internal consistency and avoid duplication or conflict with related regulations.

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.

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Local Development Review (LDR) Safety Review Practitioner's Guidance, prepared in February 2024. You can review the SB 743 Implementation Resource at the following link:

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

The proposed ordinance is regulatory in nature and does not authorize a specific development project or event. Therefore, adoption of the ordinance would not directly generate VMT or traffic impacts attributable to a defined project.

However, implementation of the ordinance would enable future event facilities and special events, some of which may have the potential to affect travel demand, traffic operations, and safety. Caltrans recommends that the DEIR clearly establish a framework to address the following:

1. Caltrans recommends that the environmental document clearly establishes that transportation impacts, including but not limited to VMT, traffic operations, and safety effects, shall be evaluated at the time of discretionary review for each individual event or event facility, as appropriate.
2. For individual events or facilities subject to discretionary approval, the lead agency should require VMT screening and analysis consistent with CEQA and applicable state guidelines. The need for analysis should be based on objective criteria such as anticipated attendance, duration, frequency, and proximity to regional transportation facilities.

3. For events subject to discretionary approval, the County should also consider requiring event-specific Transportation Demand Management (TDM) strategies, as appropriate, to reduce single-occupant vehicle trips and minimize potential operational impacts. Such measures may include shuttle services, transit incentives, rideshare coordination, bicycle accommodation, parking management strategies, and advance transportation demand messaging to attendees.
4. Caltrans further recommends that traffic operations and safety impacts be evaluated on an event-by-event basis, particularly for events that may affect the State Highway System (SHS). Event-level review should address, as applicable:
 - Access routes to and from SHS facilities.
 - Temporary congestion, queuing, and ramp operations.
 - Pedestrian, bicycle, shuttle, and rideshare activity near SHS facilities.
 - Emergency access and incident response.
5. Where an event has the potential to affect SHS operations or safety, Caltrans should be consulted early in the review process, and site-specific traffic analysis and/or traffic management plans should be required as conditions of approval.

The above approach would ensure compliance with CEQA and SB 743 while preserving Caltrans' ability to review and address potential impacts to the State Highway System as specific events are proposed

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-2026-05004-NOP.

Sincerely,



Anthony Higgins
Acting LDR Branch Chief

Cc: State Clearinghouse