

**DEPARTMENT OF TRANSPORTATION**

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May 2, 2022

Alison Spindler-Ruiz  
City of Long Beach  
411 W. Ocean Boulevard, 3<sup>rd</sup> Floor  
Long Beach, CA 90802

RE: Climate Action and Adaptation Plan and  
Safety Element Update Project  
SCH # 2015051054  
Vic. LA-405, LA-710, LA-605, SR-01  
SR-103, etc. Citywide  
GTS # LA-2021-03897-DSEIR

Dear Alison Spindler-Ruiz:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The project includes both the adoption of a Climate Action and Adaptation Plan Project (CAAP) and Safety Element Update. The proposed CAAP is a comprehensive planning document outlining the City's proposed approach both to address climate impacts on Long Beach and to reduce Long Beach's impact on the climate by reducing GHG emissions.

The proposed CAAP includes a roadmap for implementing new policies, programs, incentives, requirements, projects, and initiatives in the immediate future, as well as longer-term actions that will need to be studied further, while monitoring how the climate continues to change and evaluating the effectiveness of actions taken. The proposed project also includes the adoption of an updated Safety Element to bring the Safety Element up to date and into compliance with several state laws related to climate change and resiliency, and to consolidate the City's existing Public Safety and Seismic Safety Elements.

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:

<http://opr.ca.gov/ceqa/updates/guidelines/>

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.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order 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). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

The proposed CAAP would promote a reduction of VMT, and a CAAP Action is designed to ensure the City implements SB743 (see T-9). To that end, the City adopted VMT guidelines in 2020 consistent with SB 743 and the proposed CAAP. The proposed project includes measures to support the CAAP Actions related to Building and Energy, which would be constructed within or on existing or proposed buildings (e.g., rooftops) and are not expected to result in additional VMT impacts. Measures to support the CAAP Actions related to Transportation include expansion of the bicycle and pedestrian network and other measures to reduce VMT, and increased housing and employment along major transit corridors and increased density and mixing of land uses.

Development of housing and employment along transit centers would not result in additional impacts related to VMT beyond those anticipated in the adopted LUE and the 2019 Certified Program EIR; rather, the CAAP is designed to maximize GHG reduction, including through VMT reduction, as part of LUE implementation. In addition, future discretionary projects that implement measures to support the CAAP Actions related to increased transit, bicycle, and pedestrian facilities would also support reductions in VMT as analyzed in the 2019 Certified Program EIR.

We would recommend the City to consider the following policies for all future projects:

1. A post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.
2. For future projects, 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. We recommend large size truck trips be limited to off-peak commute periods.

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-2021-03897-DSEIR.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse