

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

October 12, 2020

Oct 13 2020

Mindy Wilcox
City of Inglewood
Planning Division
One W. Manchester Boulevard
Inglewood, CA 90301

STATE CLEARINGHOUSE

RE: Inglewood Transit Connector Project –
Recirculated Notice of Preparation (NOP)
SCH # 2018071034
GTS # 07-LA-2018-03366
Vic. LA-405/PM: 23.331

Dear Mindy Wilcox:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project is an automated people mover (APM) to transport riders between the regional Metro Rail system (Crenshaw Line), Downtown Inglewood, the Forum, the Los Angeles Sports and Entertainment District, and the future Inglewood Basketball and Entertainment Center. The project would consist of elevated dual guideways to allow for continuous APM trains to travel in each direction. It would also include support facilities, such as an approximately 78,000 square feet maintenance and storage facility, and two traction power substations facilities to provide the system's electrical power. Ultimately the project is planned to have a ridership capacity of 11,500 passengers per hour. The City of Inglewood is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 1.5 miles away from the Interstate 405 (I-405) and Manchester Boulevard interchange, and approximately 2 miles away from the Interstate 105 (I-105) ramps at Prairie Avenue in Inglewood.

From reviewing the NOP, Caltrans has the following comments:

- Caltrans wrote a letter in response to the original NOP for this project in 2018. Since then, the project scope has changed and the implementation deadline for Senate Bill (SB) 743 has passed. SB 743 (2013) mandates that Vehicle Miles Traveled (VMT) rather than Level of Service be used as the primary metric for determining the transportation impacts of projects under CEQA. Thus, Caltrans has reviewed the recirculated NOP from a VMT perspective.
- 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 (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- The City can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018

Technical Advisory.

- The updated TISG states, “Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues.” Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated July 2020 and found here, for the City’s reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf>.
- Caltrans looks forward to reviewing the VMT analysis for this project in the forthcoming DEIR. As discussed in Caltrans’ new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR’s Technical Advisory.

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 Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas emissions. For examples of TDM options to further reduce this project’s VMT, please 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>.

Also, 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. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic control plan detailing these delays for Caltrans’ review.

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-2018-03366.

Sincerely,



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