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*Making Conservation  
a California Way of Life.*

August 8, 2019

Marie Pavlovic  
LA County Department of Regional Planning  
320 W. Temple St.  
Los Angeles, CA 90012

Governor's Office of Planning & Research

AUG 12 2019

STATE CLEARINGHOUSE

RE: Live Oak Arcadia Townhomes Project –  
Mitigated Negative Declaration (MND)  
SCH# 2019079040  
GTS# 07-LA-2019-02684  
Vic. LA-210 PM 33.616

Dear Marie Pavlovic:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project consists of closing a 56-space mobilehome park and constructing 86 townhome condominium units, five (5) of which will be designated for moderate income affordable housing.

The nearest State facilities to the proposed project are Interstate 210 and 605. After reviewing the Initial Study and Mitigated Negative Declaration, Caltrans has the following comments:

1. As required by SB 743, Caltrans is moving towards replacing Level of Service (LOS) with Vehicle Miles Traveled (VMT) when evaluating traffic impacts. For any future project we encourage the Lead Agency to develop a verifiable performance-based VMT criteria.
  - a. Senate Bill 743 (2013) mandates that CEQA review of transportation impacts of proposed developments be modified to use Vehicle Miles Traveled (VMT) as the primary metrics in identifying impacts for all future development projects. You may reference to The Governor's Office of Planning and Research (OPR) for more information: <http://opr.ca.gov/ceqa/updates/guidelines/>.
  - b. Developing a verifiable performance VMT criteria is critical as the TIS will need to determine if there are any VMT based significant impacts.
2. 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.
3. Caltrans recommends that bicycle and pedestrian detours during construction meet or exceed standards required in the California Manual on Uniform Control Devices. Maintaining viable detour routes during construction, that include adequate barriers

against motorized traffic, is critical to the safety and comfort of pedestrians and bicyclists.

4. Please provide a Construction Traffic Management Plan (CTMP).

**Construction Traffic Management Plan:** The CTMP would include street closure information, detour plans, haul routes, staging plans, parking management plans and traffic control plans. The CTMP would formalize how construction would be carried out and identify specific actions that would be required to reduce adverse effects on the surrounding community. The CTMP should be based on the nature and timing of the specific construction activities and account for other concurrent construction projects near the project site. The following elements shall be implemented, as appropriate:

- Schedule construction activities to reduce the effects on traffic flows on surrounding arterial streets during peak hours.
- Obtain the required permits for truck haul routes prior to issuance of any permit for the project.
- The project contractor shall identify and enforce truck haul routes deemed acceptable by the City and Caltrans for construction trucks.
- Signs shall be posted along roads identifying construction traffic access or flow limitations due to single lane conditions during periods of truck traffic, if needed.
- Accommodate all equipment and worker parking on-site to the extent feasible.
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.
- Provide for temporary traffic control during all construction activities adjacent to the public right-of-way to improve traffic flow on public roadways (e.g., flag men).
- Schedule construction-related deliveries to reduce travel during commuter peak hours.
- We recommend approval from Caltrans for any lane closures during construction period.
- We recommend the design of all construction underneath the State Route and Caltrans Right of Ways be approved by Caltrans.
- Permits from Caltrans will be required for heavy trucks and machinery/vehicles travelling on the State Route.

Further information included for your consideration;

Caltrans seeks to promote safe, accessible multimodal transportation. There are multiple methods to reduce pedestrian and bicyclist exposure to vehicles. These methods include the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, or a reduction in crossing distances through roadway narrowing. Visual indicators such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes. Visual indication from signage can be reinforced by road design features such as narrow lane widths, landscaping, street furniture, and other design elements.

With regards to parking, Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates

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that the amount of car parking supplied can undermine a project's ability to encourage public transit use. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2019-02684.

Sincerely,



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