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**Governor's Office of Planning & Research**

**SEP 18 2019**

**STATE CLEARINGHOUSE**

September 17, 2019

Joseph Palombi  
City of Commerce  
2535 Commerce Way  
Commerce, CA 90040

RE: Modelo Project  
Notice of Preparation of a Draft  
Environmental Impact Report (NOP)  
SCH# 2019080312  
GTS# 07-LA-2019-02771  
Vic. LA – 5/ PM 9.665

Dear Mr. Palombi:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project calls for the construction of a mixed-use development including park and open space, residential, commercial uses, and related amenities. The Project involves reconstruction of Veterans Memorial Park and an adjacent vacant parcel into a mixed-use development, including public community uses, 825 residential units, and approximately 165,000 square feet of entertainment retail uses. Additionally, due to the previous use of the Project site as a landfill, the Project involves remediation to allow for safe implementation of the Project. The Project proposes to revitalize Veterans Memorial Park with new structures, a playground, a soccer and baseball youth sports complex, a library, a grass-stepped amphitheater, and additional outdoor green space. The City of Commerce is the Lead Agency under the California Environmental Quality Act (CEQA).

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).

The nearest State facilities to the proposed project are Interstate 5 (I-5), Interstate 710 (I-710), and Interstate 605 (I-605). After reviewing the NOP, Caltrans has the following comments:

An encroachment permit will be required for any project work proposed or in the vicinity of the Caltrans Right of Way and all environmental concerns must be adequately addressed. Please note that any modifications to the State facility (I-5) will be subject to additional review by the Office of Permits prior to issuance of the permit. APN 6357-018-005 is parcel closest to Caltrans Right of Way. Please refer to RW Maps F-2006-3/4 for further clarification.

The project plans to provide an increase in bicycle and pedestrian friendly accommodations, while adding mobility alternatives. The NOP mentions the following additions:

- Commerce Bus Line stop at Veterans Park on the eastern portion of the Project site
- Connection from the Commerce Bus Line to the proposed Washington Boulevard Metro Gold Line Extension, at Washington Boulevard and Rosemead Boulevard in the City of Pico Rivera
- Enhancement of the existing bus stops at Slauson Avenue and Gage Avenue through additional shade, seating, and signage
- Adding bicycle parking for visitors and residents; and encouraging bicycle path traffic from the Rio Hondo Bike Path to use the new Veterans Park amenities, as well as the proposed entertainment retail uses

Caltrans seeks to promote safe, accessible multimodal transportation. As such Caltrans supports the previously mentioned multi-modal improvements. In addition to those mentioned, the Lead Agency may wish to consider implementing other measures that reduce vehicle speeds. The reduction of vehicle speed benefits 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.

Caltrans encourages projects of this nature that create high quality bicycle and pedestrian accessibility and transportation alternatives for local and inter-regional trips. State-level policy goals related to sustainable transportation seek to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG), and encourage alternative modes of travel. Caltrans' Strategic Management Plan has set targets of tripling trips made by bicycle and double trips made by walking and public transit by 2020. The Strategic Plan also seeks to achieve a 15% reduction in statewide, per capita, vehicle miles traveled (VMT) by 2020. Similar goals are embedded in Caltrans' 2040 Transportation Plan, and Southern California Association of Governments' (SCAG) Regional Transportation Plan. Statewide legislation such as AB 32 and SB 375, as well as Executive Order S-3-05, echo the need to pursue more sustainable development. Projects, like the one proposed, can help California meet these goals.

Due to the size and scope of the project and its proximity to I-5, I-710, and I-605 Caltrans requests that the following concerns be addressed in the Traffic Impact Study (TIS) for the EIR:

- Additional traffic generated by this project may have an adverse impact to the State facilities, potentially backing traffic onto the mainline (queueing) creating Traffic Safety Conflicts. A queueing analysis should be completed.
- Potential Transportation Impact Analysis should include, but not be limited to, on- and off-ramps and affected intersections (left- and/or right-turn queue), in the project vicinity. The TIS should include the State facilities within the study area: I-5, I-710, and I-605.
  - We suggest the TIS Report include an analysis of all I-5 on- and off-ramps from the intersection of I-5/I-710 to I-5/I-605, as well as, interchanges at I-710/ Florence Ave and I-605/ Slauson Ave.

The TIS should discuss the results of intersection, freeway, and interchange/ramp performance analyses at the above locations. Caltrans recommends that the Highway Capacity Manual (HCM) Sixth Edition method be used for conducting all operational and conflict analyses on State highway facilities. Specifically, queuing analyses based on the HCM queuing methodology are required for any Caltrans' off-ramps that would be potentially significantly impacted by the project. Also, when the State highway facility has saturated flows, it is encouraged that a micro-simulation model be used for the analyses.

The Tenth Edition of the Institute of Transportation Engineers' (ITE) Trip Generation Manual should be used for determining trip generation forecasts and trip reductions (e.g. pass-by, diverted, and internal capture trips). Local trip generation rates are acceptable if appropriate validation is provided.


When performing the Traffic Study, please also include truck(s) when conducting counts to collect traffic movement volume. Trucks hauling excavated materials and debris, transportation of construction equipment, the delivery of construction materials, and construction workers coming to and from the project location might increase traffic at the aforementioned interchanges and could impact their operation and safety. Therefore, during construction, the hauling/equipment trucks should be operated strategically and use alternative routes to keep the freeway operation system working effectively. If construction traffic is expected to cause delays on any State facilities, please submit the Work Area Traffic Control Plan detailing these delays, as well as information on a Truck Haul Route Program, for Caltrans' review.

Furthermore, 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 the generated trips are significantly impacting these interchanges, mitigation measures must be studied and recommended. Mitigation must consider pedestrian and bicycle traffic as it is applicable. Fair Share Contribution toward future or previously determined projects is a form of mitigation.

We look forward to reviewing this project's future Draft EIR and will provide additional comments at that time, if warranted. In the spirit of cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. 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-2019-02771.

Sincerely,



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