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Governor's Office of Planning & Research

**OCT 04 2019**

## STATE CLEARINGHOUSE

October 1, 2019

Kathryn Laudeman  
Los Angeles Department of Water and Power  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

RE: Mid Valley Water Facility Project – Mitigated  
Negative Declaration (MND)  
SCH# 2019099008  
GTS# 07-LA-2019-02808  
Vic. LA-405/ PM 42.935

Dear Kathryn Laudeman:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project proposes to construct a consolidated campus with modern facilities and consolidated operations for the Mid Valley Water Facility. The new facility would be comprised of approximately 235,967 square feet of buildings, 216,000 square feet of above ground parking, and 180,168 square feet of additional yard/expansion space on an approximately 17.3-acre parcel located at 7600 North Tyrone Avenue in the Van Nuys area of the City of Los Angeles.

The nearest State facilities to the proposed project are State Route 170 and Interstate 405. After reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. However, a potential cumulative impact could occur as a result of the combined effects of other past, present, and foreseeable future projects within the vicinity of this project. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative transportation impacts in the future.

Page 9 section 1.4.1 of the Transportation Impact Study, pertaining to the Freeway Impact Analysis, discusses a Freeway Impact Analysis Procedures agreement between LADOT and Caltrans District 7. This document should no longer be used as it expired at the end of 2016.

Regarding the use of a Congestion Management Program (CMP) in evaluating a State facility: Caltrans is responsible for obtaining measures that will off-set significant impacts to State facilities. Therefore, the CMP guidance of 150 or more vehicle trips added before freeway analysis is needed, does not apply. MTA's CMP, in acknowledging Caltrans' role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System.

Caltrans is replacing Level of Service (LOS) with Vehicle Miles Traveled (VMT) when evaluating traffic impacts. By July 1, 2020, VMT will be the standard transportation metric for land use projects and new Transportation Impact Study (TIS) guidelines will be used to analyze and address transportation impacts on the State Transportation System. For any future project we

encourage the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. As required by SB 743, Caltrans recommends the Lead Agency develop a verifiable performance-based VMT criteria.

Caltrans acknowledges and supports the prioritization of nearby transit service, like the Van Nuys Metrolink Station, to offset the daily trip generation that the project will create. However, the project is still designed in a way that induces high am/pm peak hour vehicle trips. This demand should be addressed with appropriate design and management principles. 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 that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building an excessive amount of parking.

Additionally, 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 contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2019-02808.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse